Exhibit 20 – Public Organization and Individual Comment and Response Table

This exhibit contains Denver Water's responses to more than 900 comments from public organizations and individuals on Denver Water's Gross Reservoir Expansion (GRE) Project 1041 Permit Application. For organizational comments, Denver Water first coded comments by assigning a Letter ID to the source organization, as shown in Table 1 below. Denver Water then assigned a unique Comment ID to each comment within each letter and drafted a response, as shown in Table 3 below.

For individuals, given the large number of comments on the same topics, Denver Water first assigned Issue Numbers, as listed in Table 2 below. Denver Water then assigned Comment IDs to each comment within each letter, grouped the Comment IDs with their corresponding Issue Numbers, and drafted a response, as shown in Table 4 below. Many comments from public organizations and individuals were associated with campaign letters, which are listed in Table 5 below. Denver Water has responded to comments in the campaign letters in Tables 3 and 4.

For reference, a copy of the original letters coded with Letter and Comment IDs are included in Exhibit 35.

Table 1 – Comments from Organizations

Comment Letter ID	Organization	Date Comment Submitted	Page Number in this Document
O-A	The Environmental Group & Save The Colorado	12/16/2020	5
O-B	The Environmental Group & Save The Colorado	12/11/2020	17
O-C	Boulder Flycasters Chapter of Colorado Trout Unlimited	12/9/2020	18
O-D	Coal Creek Canyon Parks and Recreation District	12/8/2020	21
O-E	The Environmental Group & Save The Colorado	11/13/2020	22
O-F	Boulder County Audubon Society	11/13/2020	34
O-G	The Environmental Group & Stop Gross Dam Expansion	11/12/2020	35
O-H	Americas for Conservation + the Arts (AFC+A)	11/12/2020	38
O-I	Sierra Club	11/10/2020	39
O-J	Lazy Z Estates Homeowners' Association	10/15/2020	40
O-K	PLAN-Boulder County	11/9/2020	41

Table 2. Issues based on Individual Public Comments

Glossary of terms used by Denver Water in response to comments

AF	Acre-foot	FERC	Federal Energy Regulatory Commission
AF/yr	Acre-foot Per Year	GRE Project	Gross Reservoir Expansion Project, also known as the Moffat Project
CDPHE	Colorado Department of Public Health and Environment	IRP	Integrated Resource Plan
CEQ	Council on Environmental Quality	kW	Kilowatt
CO_2e	Carbon Dioxide Equivalent	NEPA	National Environmental Policy Act
Corps	U.S. Army Corps of Engineer	NWCCOG	Northwest Colorado Council of Governments
CPW	Colorado Parks & Wildlife	O&M	Operations and Maintenance
CR	County Road	PACSM	Platte & Colorado Simulation Model
CSFS	Colorado State Forest Service	P.E.	Professional Engineer
CWCB	Colorado Water Conservation Board	SEO	State Engineer's Office
EA	Environmental Assessment	SH	State Highway
EIS	Environmental Impact Statement	USFS	U.S. Forest Service

Table 3. Public Organization Comments and Responses

O-A	**Save the Colorado and The Environmental Group** **Date: 12-16-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-A-01	On behalf of The Environmental Group and Save the Colorado, attached please find a comment letter and 5 exhibits regarding the proposed Gross Reservoir and dam expansion. Exhibit-1_Woodling Aquatic Resources Assessment.PDF Exhibit-2-CoE-Letter-on-Moffat-GHG-Emissions-6-18-20151.pdf Exhibit-3-Final Firm Yield Calculation LRB 1 Oct 2015.pdf Exhibit-4-Udall and Overpeck - 2017 - The twenty-first century Colorado River hot drough.pdf Exhibit-5-Hydros Risk Phase III Final Report.pdf	Attachments	The Corps and FERC considered the issues addressed in these exhibits during the federal NEPA process.
O-A-02	**Comment #1, pertaining to: 8-507,D.7.b.iii (A)(B)(C) and 8-511-B.5.c.i, iv, vi, ix, x and 8-511,B.5.f. all subheadings**. The Woodling (2018, Exhibit #1) report on aquatic life refutes Denver Water claims that increased water volume in upper South Boulder Creek and prolonged colder temperatures of water below Gross Reservoir do not have any long-term impacts on fish populations. The 1041 permit is incomplete because aquatic resources in Boulder Creek both upstream and downstream of Gross Reservoir have not been fully defined, increases of upstream flows and reduced temperatures of stream flow downstream of the reservoirs would adversely impact trout populations in South Boulder Creek, and proffered mitigations are ineffective. In his report he states that: 1. **multi-staged release structures from the dam would mitigate aquatic life impacts on South Boulder Creek between Gross Reservoir and the South Boulder Diversion structure.** 2. Denver Water has failed to adequately describe aquatic resources in South Boulder Creek thus there is no basis for an impact analysis 3. higher flows in South Boulder Creek upstream of Gross Reservoir would reduce trout fry survival and increase erosion of banks - adding sediment to the stream. 4. downstream of Gross Reservoir water temperatures are already colder than would be expected on similar streams because releases are taken from the bottom of the reservoir which stratifies into October and that expansion of the reservoir would result in a 30 percent decrease in “degree days that are currently available for fish growth.” 5. the SEA does not provide any proof of their claim that fish populations in Gross Reservoir will benefit from a larger reservoir 6. monitoring and placement of signs warning of fish consumption do not decrease the likelihood of increased mercury in fish 7. the 5,000 AF environmental pool is not well thought out as further increasing the size of the reservoir it would exacerbate downstream water temperature issues	Fish/Aquatic Biology	The issues raised by Mr. Woodling were considered throughout the permitting process for the GRE Project. 1. Stream temperatures on South Boulder Creek – the Corps, FERC and the CDPHE each independently evaluated the impact analysis completed for the GRE Project by AECOM. Additionally, CPW reviewed the analysis and entered into a mitigation plan for the identified impacts. 2. The impact analysis included in the 1041 Permit Application was the same impact analysis completed by the Corps for the issuance of a 404 Permit, CDPHE for issuance of the 401 Certification and FERC for issuance of an Amended License. Additionally, CPW reviewed the impact analysis and agreed to the mitigation plan developed by Denver Water. 3. See response above. Also, a stream bank stability monitoring program will be developed by Denver Water to evaluate bank stability related to the increased transport of water through the Moffat Tunnel. As a reminder, the peak flow in South Boulder Creek will not be increased by the GRE Project. Rather the duration of high flows will increase. The increased duration of high flows is not anticipated to impact bank stability, but a monitoring program will be established. 4. Denver Water agrees, the existing condition of the stream below Gross Dam is cold. However, when looking at the overall impacts of the expanded Gross Dam on South Boulder Creek, the impact is positive per the analysis completed by the Corps. Additionally, the creation of the Environmental Pool will benefit the fishery below Eldorado Springs as presently low flow and no flow periods impact the fishery. 5. The statement that fish populations would benefit from an enlargement of Gross Reservoir is based on professional opinion that an increase in habitat availability will benefit fish present in a water body. The FERC Supplemental EA (section 5.1.4) includes detail on why FERC reached this conclusion. Considered in this decision was erosion, turbidity, sedimentation and reservoir habitat area (littoral and pelagic). Additionally, FERC acknowledged that several of the plans being prepared by Denver Water and approved by FERC would minimize negative impacts related to

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	8 Of the 8 "mitigation" projects proffered by Denver Water, 6 entail monitoring only which do not qualify as mitigation. Two mitigations are the environmental pool (#7 above) and the tree removal program (which does not benefit aquatic resources).		construction activities (Tree Removal, Stormwater Management, Erosion and Reclamation, and Quarry Operation). 6. Currently Gross Reservoir has a consumption advisory for fish. This is not uncommon in Colorado as several waterbodies have consumption advisories. Mercury accumulation in fish tissue will be reduced by removing as much organic matter as practicable prior to inundation. The CDPHE 401 certification has a specific condition related to mercury that Denver Water must comply with. 7. The 5,000 AF Environmental Pool, which was sought by the City of Boulder and City of Lafayette and agreed to by Denver Water, will provide water for low flow periods on South Boulder Creek. These low flow periods currently limit habitat availability and fish survival. 8. The Environmental Pool will benefit aquatic resources during low flow periods. At times, sections of South Boulder Creek are dry or nearly dry. When this happens, fish habitat and survival is impacted. Adding water during these low flow or no flow periods will increase fish habitat and survival, and increase the amount of time minimum stream flows are meet. The Tree Removal Plan will decrease mercury bioaccumulation in fish tissue. The Woodling report does not list all the mitigation activities related to the GRE Project. For a complete description of mitigation, please see the following documents: Corps 404 Permit, CDPHE 401 Certification, USFS Settlement Agreement, FERC Articles, and Fish and Wildlife Mitigation Plan. All of these documents are in Exhibit 5 of the 1041 Permit Application.
O-A-03	**Comment #2, pertaining to: 8-507.D.7.v: Air quality analysis** in the 1041 application for the Moffat project is incomplete because it does not address greenhouse gas emissions (GHG) of the project reported and requested in the STC's July 18, 2015 letter (Exhibit #2). GHG emissions would be included under Section B of (v), "other adverse impacts on air quality anticipated from the proposal." Exhibit 14 of the 1041 application examines: 1. exhaust emissions associated with construction equipment 2. on-road vehicle engines 3. fugitive dust emissions associated with equipment and vehicle travel on unpaved roads, material handling, excavation activities and wind erosion. Air quality analyses reported in Exhibit 14 of the 1041 permit focus on estimates of carbon monoxide (CO), nitrous oxides (NOx), sulfur dioxide (SO2), and particulate matter (PM10 and PM2.5) emissions. Carbon dioxide emissions were evaluated in Appendix C of the Final Borrow Haul Study included in the FERC Final License Amended Application Volume III. This analysis included only direct GHG emissions - those owned and controlled by the reporting entity - of hauling materials to and from the site (page C-6). The Borrow Haul Study discusses the February	Air Quality	In Appendix B to its Record of Decision, the Corps specifically responded to Save the Colorado's June 18, 2015 comment letter. To summarize briefly, the Corps explained that it had performed detailed carbon emissions calculations for the GRE Project in section 5.13 and Appendix I of the Final EIS, including by estimating construction related emissions for activities such as equipment exhaust and concrete batching. Save the Colorado's comment letter did not specifically address or reference the Corps' analysis, and the comment letter did not explain how the proffered alternative numbers were derived, developed, analyzed and calculated, making it impossible for the Corps to respond any more specifically. The Corps considered the draft CEQ guidance in preparing its analyses. The Corps noted that Denver Water's agreement to convey more than 500 acres of property (the "Toll Property") to the USFS was appropriate mitigation for impacts to the forest resources on National Forest System lands. Additionally, in section 5.1.11.2 of the FERC Supplemental EA, the FERC responded to Save the Colorado's comments concerning carbon emissions from tree removal, stating that "the proposed removal of trees would reduce carbon uptake, and combustion would release carbon dioxide; however, we are not aware of any reliable models that would enable analysis of these effects on climate conditions. Based on the scale of the GRE Project in comparison to other sources of greenhouse gas in the atmosphere, we expect the effects of tree removal and disposal on global climate change would be minor."

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	18, 2010 Council on Environmental Quality (CEQ) Draft Guidance Memorandum requirements under NEPA (page C-7) for • "the treatment of GHG emissions that may directly or indirectly result from proposed federal action" and • "the analysis of potential climate change impacts upon the proposed federal action." • In addition, they note that "the threshold of 25,000 metric tons of CO2-equivalent GHG emissions annually is suggested as a "useful, presumptive, threshold for discussion and disclosure . . . ." All federal agency actions requiring NEPA review . . . . are covered by this guidance" (page C-7). Direct CO2 emissions noted in the Final Borrow Haul Study amount to 4,247 tons/year due to fuel consumption when hauling aggregate, cement, fly ash, timber and ash slash one-way to the site (Table C-3). It is anticipated that GHG emissions would approximately double if trucks were to drive both to and from the site. **The 1041 permit is incomplete because it fails to include indirect GHG emissions of the Moffat project - in particular, the large amount of GHG emissions from production of cement - and fails to include direct GHG emissions from construction and tree removal activities at the site.**		
O-A-04	**Comment #3, pertaining to: 8-511:B.3**: "**Adequate water supplies, as determined by the Colorado State Engineer, are available for the proposal if applicable."** <u>Full Use to Project Water Supply Not Sufficient to Provide 18,000 AF of Firm Yield</u> The 1041 application on page 5 states that "Water diverted under existing water rights and facilities from the Upper Williams Fork and Fraser Rivers and South Boulder Creek to the expanded Gross Reservoir will provide 18,000 acre feet per year of additional supply and improve Denver Water's system reliability." This statement is not consistent with the FEIS in which only additional diversions between their Full Use Baseline and the Project would be available to supply the additional 18,000 AF – thus limiting potential impacts of the project on both the east and west slope streams to this smaller portion of the additional diversions. In addition, system reliability also depends on how climate change will impact streamflow in the source basins – a factor that has not been addressed in the FEIS, the 401 certification, the SEA, or the 1041 application. Table H.7-1 of the FEIS provides PACSM model results of Gross Reservoir levels and resultant stream flow for both the east and west slope streams. In particular, the FEIS claims that an increase of 10,285 AF per year on average (the difference in Moffat Tunnel flows between their Full Use baseline and the project diversions) is all that is required to supply an expanded Gross Reservoir with 18,000 AF of additional water supply. This additional supply is needed to maintain flows of 30 mgd at the Moffat Water Treatment Plant (MWTP) during the winter months. Previously, the MWTP was shut down in the winter time. Table H.7-1 shows that, per their PACSM model, post-project Gross Reservoir storage in average years would decrease by 24,243 AF between November and April. This	Water Supply	The purpose of the GRE Project as stated in the Final EIS, FERC Application and 1041 Permit Application is to increase the yield of Denver Water's system by 18,000 AF by expanding Gross Reservoir by 72,000 AF. These numbers are consistent throughout the various permitting efforts. The total expansion of 77,000 AF includes the 5,000 AF Environmental Pool, which was included in all the impact analysis completed by regulatory agencies. The Corps did an evaluation of the impacts from Current Conditions to Project and Full Use of Existing System to Project. The first comparison shows the cumulative impacts as Denver Water grows into its existing collection system, Reasonably Foreseeable Future Projects, and the GRE Project. The latter shows just the impacts associated with the expansion of Gross Reservoir. Climate change was considered in the Corps' decision and other permits as a qualitative analysis. See response to comment I-6 of Exhibit 19 – Referral Agency Comment and Response Table for more information. One of the impacts evaluated was the change in operation of the Moffat Water Treatment Plant. Currently, there is a lack of storage on the North end of the system that prevents yearly operation of the Moffat Water Treatment Plant. As the demand on Denver Water's system increase in the future, having the ability to treat water at each of the treatment plants on a year-round basis is a must. Treatment plants must be taken offline from time to time to perform maintenance and upgrades. Building flexibility into a water collection system is needed to plan for these activities as well as unplanned

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	compares to a pre-project (Full Use) decrease of 6,111AF in these months; or a difference of 18,132 AF. An increase in supply of only 10,285 AF is not sufficient to supply this additional amount of water to the MWTP. A water balance estimate completed in 2014 (Buchanan, 2014 revised in 2015, Exhibit #3) showed that all additional water at diversion structures (between the existing measured baseline equal to the average Moffat Tunnel flows through 2012 and the Project) in both the Williams Fork and Fraser River basins is necessary to provide an additional 18,000 AF of firm yield to the expanded Gross Reservoir. However, the FEIS states that this additional firm yield will be attained only with the addition of water supply between the Full Use and Project amounts. If the latter is true, e.g. if the amount of water that can be diverted under Full Use is already allocated elsewhere, then additional water must be supplied by another source, one that must be available to Gross Reservoir and the Moffat Water Treatment Plant. Please explain where the additional water would come from and if it would increase flows in upper South Boulder Creek. **When finalizing the South Boulder Creek Stability and Monitoring Plan design criteria need to include the highest flows that are anticipated from western slope diversions. If an additional water source is to be used to supplement the 10,285 AF then additional flows through the Moffat Tunnel into South Boulder Creek need to be incorporated into that design.** <u>Additional withdrawals combined with climate change increases the risk of a compact call on the Colorado River</u> Temperature increases caused by climate change have been linked to reduced streamflow in the Colorado River basin (Udall and Overpeck, 2017, Exhibit #4). In particular, the drought that started in the early 2000s and continues into the present has resulted in very low levels in both Lake Powell and Lake Mead - 44% and 39 % of full capacity as of November 23, 2020 (Glen Canyon Institute, Vol 19, No 11, Nov 24, 2020 - Colorado River Lowdown). Climate change and additional trans-mountain diversions (TMD) from the upper Colorado to the eastern slope of Colorado raise two concerns. 1. Limiting the PACSM analysis to the 1947 to 1991 time frame does not reflect how climate change has impacted Denver Water's water supply in the upper Fraser and Williams Fork basins. It is unclear if this water supply will continue to provide the same yield as in the 1947 to 1991 historical hydrologic record. **The PACSM model period needs to be extended to 2020 to evaluate how drought would affect operation of the expanded Gross Reservoir.** 2. **Additional TMDs compound the effects of climate change on Upper Colorado River basins.** If Lake Powell levels decline to the point where the upper basin cannot provide the 7.5 MAF or 8.25 MAF (including our obligation to Mexico) per year (75 MAF or 82.5 MAF average over 10 years) allocation to the lower basin states the risk of a compact call increases. The Phase III Hydros report (2019, Exhibit #5) evaluated which water rights would be most at risk if a compact call were to occur by quantifying post-compact (post-1922) water right		outages. Operating the Moffat Water Treatment Plant in the winter will increase outflows in the winter but decrease outflows at other times of the year. In its response to comments on the Final EIS, the Corps specifically responded to Lisa Buchanan's analysis and explained in detail why it disagreed that there would be insufficient water to fill the expanded reservoir. See Attachment B to the Corps' Record of Decision, where the Corps responds to Save the Colorado's October 27, 2015 comment letter. There, the Corps explains how the additional storage space at Gross Reservoir will allow Denver Water to operate its entire system in a more flexible manner so that, in average to wet years, additional water can be stored in Gross Reservoir as a buffer against future drought. Please also see section 2.1.3 of Attachment B to the Corps' Record of Decision, where the Corps responds to Save the Colorado's comments regarding a possible compact call on the Colorado River. In short, planning for the future of the Colorado River Basin to avoid compact calls is being addressed through a U.S. Bureau of Reclamation process in coordination with the Basin states, water providers and stakeholders. As Save the Colorado notes in its comment here, it is still undecided how Colorado would administer a compact call on the Colorado River. Additionally, as the Corps explained in responding to comments on this issue in Appendix N of the Final EIS, it is not possible to determine the extent to which a compact call would be attributable to this individual project, independent from a multitude of other water uses and factors. This is particularly true for the GRE Project because the potential for a compact call exists when the Colorado River system is stressed and, in these dry periods, additional GRE Project diversions are not planned. The Corps did assess the cumulative impact of the GRE Project with other reasonably foreseeable future actions, such as the Windy Gap Firming Project. Please see section 4.3 of the Final EIS for more information. The Corps ultimately concluded that expanding the existing Gross Reservoir was the least environmentally damaging practicable alternative to meet the purposes and needs for the GRE Project.

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	depletions or usage in each Colorado basin. In-basin or western slope use was separated from Trans Mountain Diversions in the Upper Colorado River Basin. If a compact call were to require a full curtailment of all post-1922 water rights, the Upper Colorado TMDs would make up 57.1 percent or, on average, 531,952 AF of the total post-compact curtailment (931,969 AF) - Table 6 and Figure 12 of the Hydros report. Note that it is still undecided how Colorado would administer a compact call on the Colorado River. TMDs that transfer upper Colorado River water to the eastern slope include Colorado Big Thompson (CBT), Windy Gap, and Moffat projects. **Though Moffat project water via Gross Reservoir is used by customers in Denver, removal of additional water from the Upper Colorado River's western slope streams could contribute to risk of a compact call on CBT and Windy Gap water used by other Front Range communities within Boulder County. These include Boulder, Longmont, Louisville, Lafayette, Erie, Lyons, and Superior.** **At this time, Denver Water has not evaluated how the Moffat project would factor into the risk of a compact call on the Upper Basin of the Colorado River. Denver Water has also not evaluated how climate change would impact the Moffat Project. Its assessment of water supply is therefore, incomplete.**		
O-A-05	**Comment #4, pertaining to: 8-507:D.7.b.ii (D), 8-511:B.5.d.i, ii, iii: Groundwater quality and Water Levels** Earlier comments (Nov.13, 2020) submitted by John Barth for Save the Colorado and The Environmental Group discuss how Denver Water has omitted any analysis of impacts to residential groundwater wells per i, ii, and iii below. The following comment is in addition to earlier comments. i. Changes to aquifer recharge rates, groundwater levels, aquifer capacity including seepage losses ii. changes in capacity and function of wells within the impact area iii. Changes in quality of well water within impact area. The Moffat 1041 application does not address the impact of substantially higher reservoir levels - up to 142 feet - on water supply wells at nearby residences - particularly at the nearest residences on the north shore of Gross Reservoir. Per Appendices in the FEIS, Table H.7-1, the average change in reservoir elevations between the lowest level, typically seen in April, and the maximum level, typically seen in June or July, averages approximately 50 feet. **Reservoir levels, particularly as they vary each year, could have a substantial impact on the operation of residential wells. Denver Water needs to include annual April (minimum) and June (maximum) levels for each year of the model period.** Average reservoir levels do not provide enough information to determine how reservoir levels will vary each year – important information for residences that need to operate their residential groundwater wells. In addition, it is unclear if boat ramps extend far enough to be useable when reservoir levels are low, for instance under drought conditions. Annual minimum reservoir levels	Groundwater	Impacts to groundwater are discussed on page 115 to 117 of the 1041 Permit Application. This analysis was completed by the Corps for the Final EIS and concluded that seepage from the reservoir would likely increase, an increase in groundwater levels in the vicinity of Gross Reservoir, and groundwater discharge east of Gross Reservoir would likely rise slightly. Existing groundwater wells in the area would have an increase in available water due to the increased in storage at Gross Reservoir. The groundwater mounding effect would cause all eastward hydraulic gradients to decrease and thus decrease the eastward flow towards the reservoir. The Corps' Final EIS evaluated future reservoir fluctuations and concluded that they would be similar to existing conditions. Page 43 of the 1041 Permit Application discusses annual operations and the effect on reservoir levels. The length and lowest point of the boat ramp will be determined in the final FERC Recreation Management Plan. Denver Water is unsure of how future droughts may impact groundwater wells as the reservoir expansion will not increase or decrease the likelihood of drought. Additionally, the lowest elevation of the expanded reservoir will not change from today. Therefore, any impact lower water levels have on groundwater wells due to droughts is an existing condition and does change because of the GRE Project.

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	need to be used to design recreation facilities at the expanded reservoir. Extending the model period beyond 1947 to 1991 would provide valuable information on how the expanded Gross Reservoir would respond to more extensive droughts of the early 2000s. This information is important for residential wells as well as for design of recreation facilities.		
O-A-06	**Comment #5, pertaining to: Tree Removal Plan: (Appendix E-6 of the FERC Application) Land Stewardship LLC, February 2008). This plan needs to be completed.** A preliminary plan for tree removal was completed in 2008 by Land Stewardship LLC. In this report, the area that would be inundated by the expanded Gross Reservoir, that would be logged, is separated into Stand numbers based on types of trees, hillside slope (greater or less than 40 percent slope), access to existing roads, and anticipated methods of logging the trees. The acres, hillside slope compared to 40 % grade, number of "stems" or trees, and tonnage of material to be removed is noted in Table 2 of the report. This report compared various methods of slash/tree disposal including: • Air Curtain Destructors which entails burning slash in an efficient incinerator. One ton of slash would produce 48 to 80 pounds of ash for disposal in a landfill. • Grinding of whole trees which produces a large volume of chipped wood. A grinder can grind 22.5 tons per 20 minutes and would take 2,666 hours to grind slash from the project. They anticipate using several grinders but would then be limited by the ability to transport chipped wood from the site; anticipated to be 23 tons/truckload or a total of 2,174 loads. • Hauling timber which is less efficient than removing chipped wood and would require more truckloads. The western staging area would be located on Winiger Ridge at a helicopter pad site. Helicopters would be used to remove individual trees from hard to access areas and to remove logs from staging areas where ground based logging methods are employed. To reduce the number of temporary roads and volume of chipped wood, Land Stewardship also prepared an Alternative Tree Removal document that utilizes a slash bundler which wraps or bundles the upper "slash" portion of trees that would be placed in landings for transport to the helipad by helicopter. Here are some comments on the preliminary plan that need to be addressed in a final Tree Removal Plan: **1.** chipped wood should be delivered to a composting facility rather than placed in a landfill. Anaerobic degradation of wood in the landfill will produce methane. If composted, wood materials can be used as amendments to soils in the future. The report states, that as of 2008, a compost facility of sufficient size was not available to handle the volume of slash or chipped wood. Additional compost facilities may be currently available. **2.** It is assumed that logging roads will likely be installed to access trees for removal. Also, the report states that "portions of Forest Roads 359 and 68 would need to be	Tree Removal	Denver Water has worked with forestry experts since the 2008 report was completed and will be incorporating updated technologies into the final Tree Removal Plan. This plan will be provided to agency stakeholders in March 2021 for review. The following items will be included in that review: 1. Denver Water will investigate possible compost facilities for chipped wood material as well as other disposal methods. 2. The final Tree Removal Plan will include details on all road improvements necessary to perform the reservoir tree removal work. 3. The locations and quantity of helicopter pads and staging areas to be used for reservoir tree clearing operations will be identified in the final Tree Removal Plan. 4. The final Tree Removal Plan will include details and evaluations on all disposal methods to be used. 5. The final Tree Removal Plan will include a schedule of work for all reservoir tree removal and disposal activities. 6. The final Tree Removal Plan will include all necessary erosion control and revegetation methods to be used on site related to tree removal activities.

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	improved in order to haul the necessary equipment for logging, residue removal etc." The final Tree Removal Plan needs to provide details for improvement of FS 359 and 68 and for additional temporary roads. **3.** The preliminary Tree Removal plan fails to describe the number of helicopter trips that will be required both under the original and alternative plans to bring slash and logs to the helipad staging area. For instance, can helicopter deliveries keep up with removal/treatment activities. **4.** The final Tree Removal Plan needs to provide details of staging areas on both the east and west sides of Gross Reservoir including areas where tree debris are handled. **5.** The final Tree Removal Plan must finalize which slash/tree disposal techniques will be used. **6.** The final Tree Removal Plan must provide a schedule of operations over the entire tree removal period. **7.** The final Tree Removal Plan must also provide an erosion control plan for deforested and devegetated areas that lie below the full reservoir elevation that will be exposed when reservoir levels drop. Steep denuded slopes below the water line of the expanded Gross Reservoir would be more prone to erosion than prior to implementation of the project.		
O-A-07	**Comment #6, pertaining to: Traffic Impact Analysis (Stantec, September 17, 2020, Exhibit 4 of the Moffat 1041 Application): 8-511-J2. "The volume of traffic to be generated by the proposed development shall be compatible with the traffic handling characteristics of the interchange and the access road and existing, affected traffic roads." This plan needs to be finalized.** A total of 288 truckloads per week of cement and fly ash need to be delivered to the Gross Reservoir staging area on the east side of the dam via SH72 and Gross Dam Road. Deliveries will be made on four days per week (M, W, Th, S or F) over 8 hours a day; this means that 72 truckloads per day (9 per hour) with an interval between truckloads of 7 minutes. During peak construction times Stantec estimated that 15 truckloads of construction materials would be delivered each hour; this reduces the interval between truckloads to 4 minutes. Construction would take place over two years; 2025 and 2026. Tree removal would occur in 2026 and 2027 overlapping deliveries of construction materials in 2026. On the east side they estimate that 2 logging trucks would need to use the Gross Dam Road and SH72 per hour for a total of 17 trucks per hour on this road with an interval of every 3.5 minutes. Construction is expected to last from April through November. Trees would be removed from the west side of the reservoir via FS road 359, CR 68 to FS 359, to Lazy Z Road (CR97E), Magnolia Road (CR132) to SH119 (plugging into SH119 just south of Nederland) and exiting onto HWY 6 (in Clear Creek Canyon) and finally onto HWY 93 where trucks will travel either to the Republic Services landfill on HWY 93 or to Longmont with salvageable timber. Per the Stantec report, removal of trees and slash would take 36 truckloads per day for one week per month or 4 truckloads per hour during that time.	Traffic/Transportation	1. The final schedule and frequency of truck deliveries to site will be determined in the Traffic Management Plan. Please see response to comments B-3 and B-5 of Exhibit 19 – Referral Agency Comment and Response Table for more information. 2. There will be sufficient storage on site for all materials including enclosed storage for cement and fly ash. Thus, weather will not play a factor in storage and usage of fly ash or cement.

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	Some comments are: **1.** The Stantec report states that vehicles traveling behind trucks will be delayed 12 minutes on the Gross Dam Road (likely due to the difference in speed limits between trucks and passenger cars). With trucks arriving at the staging area every 3 to 4 minutes during the day, there is a high probability that vehicles will be delayed whenever they travel the Gross dam road whether they are traveling to or from the reservoir. Vehicles traveling behind trucks on the west side will be delayed by 25.5 minutes (for instance on Magnolia Road). Yet the traffic impact analysis states that construction traffic will not impact local traffic significantly. For people who live along these roads, this is a major imposition. **2.** Cement and fly ash need to be utilized shortly after delivery to the site. If it rains or snows, the materials will not be useable. Is there sufficient capacity in the concrete production plant and construction work on the dam to utilize the trucked in materials as they are delivered? Similarly, is there sufficient storage area at the staging areas to handle this many loads of cement and fly ash per day?		
O-A-08	**Comment #7, pertaining to: Noise; page 81 of EA**. The application states that "construction noise effects will be short-term - only 4.1 years of direct, moderate adverse effects. **Noise effects over 4 years will adversely affect local residents that do not live in the area to be part of a construction site.** "Denver water intends to use noise studies to work with community to develop measures that aim to monitor, minimize, and mitigate noise disturbance during construction to the extent reasonable and possible. DW is considering project noise goals and potential forms of restitution when construction activities exceed those goals at determined monitoring locations." **There are no details in this description. What are the project noise goals, what are the forms of restitution and where would the monitoring locations be installed?** Potentially all of the following could occur at the same time increasing noise levels: • the aggregate processing plant that will produce enough aggregate for the concrete production plant. • blasting at the quarry and during dam foundation excavation would occur once per day for over one year. • Burrow Haul trucks between the quarry and processing location • Tree Removal activities including noise from numerous helicopter trips, chainsaw, Grapple Skidder, Hydro-ax, cable yarding, grinding of slash and trees in one or more grinders, truck traffic to haul tree materials, and potentially incinerators for high efficiency burning of slash. • Truck trips to deliver cement and fly ash to east side of Gross Dam.	Noise	For the federal agencies' analyses of the GRE Project's effects on noise, please see section 5.14.1 of the Corps' Final EIS and section 5.1.10.2 of the FERC Supplemental EA for the GRE Project. Please also see section 3.1.4. of Attachment B to the Corps' Record of Decision, where the Corps responds in detail to comments regarding noise concerns from the GRE Project. As explained in those documents, engineering and administrative controls may include modifying the equipment or the work area to make it quieter, substituting existing equipment with quieter equipment, retrofitting existing equipment with mufflers, modifying backup alarm systems, shutting down noisy equipment when not needed, limiting work hours for certain construction activities and public outreach. For activities such as truck hauling, tree removal and quarry operations, measures to address noise will be incorporated into the appropriate plans required by FERC's Order. As noted, Denver Water will monitor noise levels throughout construction activities at various locations around the site. Denver Water will continue to update noise studies for onsite activities with an objective to lower site generated noise. The issues raised by the commenter will be considered when evaluating construction activities for noise generation. Denver Water will identify mitigation measures such as making equipment selections that reduce noise, using physical screening devices, banning truck engine brakes on transportation vehicles or requiring mufflers, minimizing the use of fueled generators on site, and using quieter backup alarms on equipment to reduce noise transmission to neighboring properties. Tree removal activities will be concentrated during the daylight hours for safety reasons. Some maintenance activities may occur during the night. As noted by the Corps, noise levels would be similar to other construction activities and are not expected to exceed relevant standards and guidelines.

O-A	Save the Colorado and The Environmental Group Date: 12-16-2020		
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	Two reports are included in the 1041 application for the Moffat project, both authored by Behrens & Associates Inc. The 2014 report, included as Attachment E-9 to the Final FERC License Amendment Application Volume III, evaluates noise and vibration impacts at 6 locations caused by haul trucks along SH72 and Gross Dam Roads as well as vibration impacts of a test blast at a residence on the north shore and at the existing dam. The 2017 report evaluates noise impacts of blasting and construction activities at the dam site at 3 locations. Neither report evaluates noise issues associated with tree removal activities alone or in conjunction with other construction at the site. Table 4-1 of the Behrens & Associates In (2017) provides Non-Vehicular Boulder County noise standards for sources located in a residential area (Boulder County Noise Ordinance 1.01.050d): • 55 dBA from 7 am to 7 pm • 50 dBA from 7 pm to 7 am For construction sites this noise standard is raised to 80.0 dBA for continuous noise and 75 dBA for instantaneous noise levels such as for blasting (Tables 6-5 and 6-6). Additionally, the 2014 report, page 14, states that **the noise threshold would be exceeded if the "proposed project generates noise levels significantly greater than the existing ambient noise levels around the project site" - this threshold is set at 5 dBA**. The Behrens (2014) report measured ambient noise levels at six locations; two along SH72 and 4 locations along the Gross Dam Road - locations are shown on Figure 5-1 of the 2014 report. • Location 1: Highway 72 below turnoff to Gross Dam Road, 82 feet from road • Location 2: Highway 72 above turnoff to Gross Dam Road, 30 feet from road • Location 3: Lichen Lane off Gross Dam Road; 360 feet away • Location 4: On Gross Dam Road at Crescent park Drive, 15 feet away • Location 5: On Gross Dam Road at Chute Road, 82 feet away • Location 6: 18 Juniper Heights Road; 15 feet off of Gross Dam Road Ambient noise levels at these locations are compared to anticipated noise levels from haul trucks taking cement and fly ash to the staging area at the dam site. Table 1: Ambient Versus Haul Road Noise from Behrans (2014) | Location | Daytime Ambient Noise Level (dBA) | Haul Truck Noise Level (dBA) | Difference in Noise Levels (dBA) | | --- | --- | --- | --- | | 1 | 57.9 | 61.6 | 3.7 | | 2 | 65.4 | 68.8 | 3.4 | | 3 | 46.3 | 55.3 | 8.4 | | 4 | 62.3 | 67.4 | 5.1 |		

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5	56.0	64.4	8.4
6	56.6	63.1	6.5

At four of the six locations, the increase of 5 dBA threshold was exceeded in this analysis. Further modeling brought the average of all 6 locations to 5 dBA and it was stated that the average was good enough. This will not mitigate noise impacts at 4 of the 6 locations evaluated.

Denver Water's results show that haul trucks along the Gross Dam Road will raise noise levels to greater than the allowable threshold of 5 dBA above ambient conditions at several locations. Residents close enough to Gross Dam Road would routinely be affected by truck noise during the daytime.

The Behrens (2017) report evaluates how construction noise at the processing and blasting site will impact three locations: Receptor 1 at 370 Lakeshore Drive on the north shore and 0.65 miles away from the staging area at the dam, Receptor 2 at Miramonte Road 0.4 miles away from Osprey point, and Receptor 3, Coal Creek Canyon Road 1.18 miles from Osprey Point. Ambient noise data show that background noise ranged from 30 to 55 dBA in the February 22 to March 1 test period (Table 5-1).

Noises from several construction activities were combined in this assessment. The resultant construction noise level at each receptor was between 30 and 50 dBA all below construction standards of 80.0 dBA. Blasting noises ranged from 34 to 65 dBA, again below the instantaneous limit of 75 dBA. However, Receptor 2 in this study is located close to Osprey Point and to the haul route between Osprey point and the processing area for aggregate. Table 2 shows how this location would be impacted the most by construction activity at the blasting and dam site with the noise threshold routinely exceeded in all of the first three years of construction.

Table 2: Ambient Versus Construction Noise at Receptor 2 : Behrens (2017)

Ambient Daytime Noise (dBA)	Osprey Quarry With Haul Trucks (dBA)	Change in Noise Levels (dBA)	Osprey Quarry With Conveyor (dBA)	Change in Noise Levels (dBA)
Year 1 and 2 of Construction Activities				
41.6	47.0	5.4	48.9	7.3
Year 3 of Construction Activities				
41.6	47.2	5.6	49.0	7.4
Blasting Alone				
41.6	Noise of Blast at Receptor 2 = 64.4 dBA		Change of 22.8 dBA	

Residents in areas surrounding the Gross Dam construction site are accustomed to natural outdoor noises. Additional noise caused by construction activity, even if those noises would potentially be below standards for construction activities, would deleteriously alter the environment for residents at Receptors 1 through 3 but

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	particularly and routinely for residents on Miramonte Road as this area is closest to the Osprey Point quarry area and the construction haul route. In both Behrens reports, noise from either delivery trucks on the Gross Dam road or construction/blasting noise were addressed. Combined noise levels for both of these activities were not addressed. In addition, noise from logging operations was not included in either report. Logging has the potential to affect residents on both the north and south sides of Gross Reservoir since trees and brush need to be removed from the entire shoreline of the new reservoir bringing these activities close to residences. Helicopter and grinder noises are certainly noticeable even if they do not exceed thresholds or noise standards. **How will these noises, that impact nearby neighbors, be addressed and mitigated.**		
O-A-09	**Comment #8, pertaining to: Cumulative Effects: page 87 of EA**; "Denver Water would monitor water quality and aquatic biota in compliance with WQC conditions, which would reduce effects of these resources." then they list all the plans they are going to produce which will reduce cumulative effects on resources. The plans are not done and there is no discussion of how success of the plans will be evaluated; i.e. what monitoring results will be a threshold for changing operations at the construction site. These need to be clearly defined. The following is a list of Plans that Denver Water needs to complete before Boulder County can issue a 1041 permit for the Moffat Project. Noted are Boulder County's Land Use Code associated with LUC 8-511. Also noted are the document, primarily the FERC Environmental Assessment (EA), where each required plan was listed. Most of the plans have not been included in the 1041 Application for the Moffat Project. Some such as the Traffic Management Plan, the Tree Removal Plan, and a Quarry Operation (or Noise) Plan are drafted but need to be finalized. These plans are discussed in more detail above. Many of these plans were included in a list provided by STC in their preliminary comments on the completeness of Denver Water's 1041 permit application for the Moffat project. 1. South Boulder Creek Channel Stability and Monitoring Plan - B.5.c.iv, ix, x. 2. DO and Temperature Monitoring Plan - B.5.c.i, ix. B.5.f.all subheadings: need tiered release structures 3. Stormwater Management Plan - B.5.c.i, iv, v, vii 4. Erosion Control and Reclamation Plan - B.5.c.i, iv, v, vii on FS lands 5. Quarry Reclamation Plan - B.5.c.i, iv, v, vii - for osprey point quarry 6. Reclamation and Revegetation Seed Mixes and Mulch Materials - B.5.c.iv, v, vii pg 20 EA 7. Erosion and Sediment Control Plan - B.5.c.iv, v,vii 8. Pit Development and Reclamation Plan - B.5.c.iv, v, vii for Final EIS quarry on FS lands 9. Bank Stability Monitoring Plan - B.5.c.iii,iv,v,vi, vii 10. Quarry Operation Plan - I.5. will not cause nuisance factors such as excessive noise or obnoxious odors at Osprey Point quarry - discussed further in STC comments.	Cumulative Effects	Please see response to comment G-6 of Exhibit 19 – Referral Agency Comment and Response Table for more information. Success monitoring will be detailed in specific plans as required by FERC and/or the regulation appropriate to the subject matter. Submittal of FERC-ordered plans will be in accordance with the FERC Order (issued July 16, 2020), and will be provided for review by agencies as directed in the Order. A schedule for Denver Water delivery of the FERC-ordered plans is provided in Exhibit 22. Other plans required by Boulder County Land Use Code will be prepared and submitted in coordination with Boulder County.

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	11. Tree Removal Plan: I 1,2,4,5. by FERC order 423; one year after the order a draft to Boulder county of preliminary concept- will be expanded for a final plan. Discussed further in STC comments. 12. Aquatic Nuisance Invasive Species Monitoring Plan 13. Recreation Management Plan (Article 416) page 16 of the EA; May 14, 2004. 14. Invasive and noxious Weed species Management Plan - page 17 of EA 15. Winter Ridge Recreation Management Plan + Monitoring - page 17 & 20 of EA 16. Fire Management and Response Plan - page 21 of EA 17. Special Status Plants Relocation Plan - special status plants on FS land page 21 of EA; A list of special status plants for Boulder county has been compiled in Exhibit 18 but a relocation plan needs to be completed. 18. Visual Resources Management Plan - page 22 of EA 19. Traffic Management Plan - F1,2,3 per order 425; page 22 of EA - manage construction traffic; required road maintenance and improvements, road damage due to construction activities, ensuring community traffic patterns are not disrupted. Will provide traffic management plan to Boulder county for review and comment within 1 year of FERC order. Discussed further in STC comments. 20. Historic Properties Management Plan - manage and protect cultural resources. page 23 EA. 21. Road Maintenance Plan: EA page 77; requirements for road work on FS lands. 22. Fugitive Dust Control Plan: EA page 84 to include measures to reduce fugitive dust from construction activities. 23. Public Safety and Law Enforcement Plan: revise old plan as needed for after construction is completed for recreation at the new reservoir. Road Management Plan; page 91 EA.		

O-B	**The Environmental Group and Save the Colorado** **Date: 12-11-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-B-1	Back on Nov. 13, our attorney John Barth, sent the County a comment letter along with 27 exhibits (see below). We asked that we get a confirmed receipt, but we never got one.	Attachments	Denver Water acknowledges this comment, but response is under the responsibility of the County.

O-C	**Boulder Flycasters Chapter of Colorado Trout Unlimited** **Date: 12-09-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-C-1	Attached please find comments from Trout Unlimited in support of the Boulder County 1041 application review process for the Gross Reservoir Dam Expansion Proposal. TU_BFC_GrossDamExpan_1041Comments.pdf	Attachments	Thank you for your comments.
O-C-2	**RE: Gross Reservoir Dam Expansion Proposal 1041 Application Review Process** **TO: Boulder County Commissioners and Staff** This letter provides comments from Trout Unlimited in support of the Boulder County 1041 application review process for the Gross Reservoir Dam Expansion Proposal. Trout Unlimited participated in providing comments on previous federal and state permitting actions with several positive outcomes, as discussed below. The 1041 application review process will allow Boulder County to consider the potential project impacts on Boulder County, identify actions needed to mitigate damage and disruption, AND improve the South Boulder Creek watershed. Trout Unlimited's interest and expertise is related to cold water fisheries and watershed restoration. So, our 1041 application review comments are limited to actions that could positively impact the South Boulder Creek watershed if the application receives Boulder County approval.	General Support	Thank you for your comments.
O-C-3	Under the current federal and state permitting, and negotiated compacts between Denver Water and Grand County, as well as between Denver Water, Boulder and Lafayette, there are significant environmental benefits, including some benefits to Boulder County. The most important of which is the resulting 5,000 AF Environmental Pool to provide in-stream minimum flows for South Boulder Creek during our dry winter months. South Boulder Creek is desperately in need of more flow to support watershed health, preserve native species and support recreation. Denver Water has committed between $4m and $6m to this part of the project. This important component of the expansion should, we believe, be weighed as a positive in evaluating the 1041 application.	Environmental Benefits	Thank you for your comment and support of the 5,000 AF Environmental Pool.
O-C-4	Beyond the obvious needs to mitigate transportation, environmental and life style disruptions and damage, there is an opportunity to negotiate for more complete watershed mitigation and enhancement. The Environmental Pool is a critical element of this. Denver Water's other environmental commitments to date have focused primarily (and understandably) on addressing impacts in the basin of origin. The 1041 review process now will allow Boulder County to address the South Boulder Creek watershed as well. The environmental benefits negotiated with Denver Water by Trout Unlimited are critical to the future health of the basin of origin. Fraser Valley residents and Grand County visitors are, and will continue to, benefit from these negotiations. A large percent of Grand County visitors and second homeowners are Boulder County residents. Proper watershed mitigation through the 1041 process can benefit the residents of Boulder County and ensure hard-won environmental benefits continue to accrue in Grand County. Denver Water has helped and is continuing to support local restoration and mitigation for specific projects. This includes a Trout Unlimited project, led by the Boulder Flycasters Chapter of Trout Unlimited, to develop a State funded Stream Management Plan for lower South Boulder Creek, as well as contributing more than 50% of the cost of building the Environmental Pool storage capability into the expansion. As part of the Army Corps of	Environmental Mitigation	Thank you for your comments. Denver Water would be interested in discussing ideas to address South Boulder Creek watershed concerns and collaborating with other parties to identify and implement enhancement projects in the South Boulder Creek watershed.

O-C	**Boulder Flycasters Chapter of Colorado Trout Unlimited** **Date: 12-09-2020**		
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	Engineers 404 permit mitigation requirements Denver Water funded $715,000 for mitigation on lower South Boulder Creek in City of Boulder Open Space. Denver Water will also be required to monitor and remediate associated environmental degradation resulting from the expansion. We see this as an important step forward in having more scientific data to support long term watershed improvement. Other than the Environmental Pool commitment, Denver Water's remaining mitigation commitments do not physically improve the South Boulder Creek watershed. Part of the requirements for approving the 1041 could include more collaborative investment and efforts to improve the watershed, consistent with Boulder County's overall goals and objectives.		
O-C-5	Examples of opportunities for collaborative improvement might include: • Stream and riparian habitat improvements, including native and listed species • Fish stocking programs, including native and listed species • Reservoir access improvements and on-going trail maintenance • Coordination with other water right holders on cooperative operations to benefit stream health Additionally, there are concerns that the dam expansion will negatively impact the existing downstream fishery due to potentially lower water temperatures at certain times of the year. The reaches known locally as "Kayak Run" and "Walker Ranch" are the only reasonable public fishing access in the canyon. In an effort to ensure longevity of, and potentially improve, the fishery we suggest Denver Water also commit to collaborative efforts with fisheries biologists and watershed improvement organizations to look at the potential for dam release and other operational changes to benefit the watershed. Potential objectives might be to help ensure necessary in-stream flows during low water periods and to identify other ways to ensure water conditions are suitable for sustainable trout habitat. Trout Unlimited, through our local Boulder Flycasters Trout Unlimited Chapter and Colorado Trout Unlimited, are ready to help develop a working list of potential improvement actions through our ongoing Stream Management Plan development. We would also enthusiastically help Boulder County understand and perhaps adopt a program similar to "Learning by Doing," a promising partnership among Denver Water, Grand County, Trout Unlimited, Colorado Parks & Wildlife and other watershed improvement organizations working to improve the Fraser River watershed.	Environmental Mitigation	Thank you for your comments. Denver Water is interested in discussing the idea of a South Boulder Creek Learning By Doing initiative with additional stakeholders such as Boulder County. Like the Learning By Doing collaborative group in Grand County, a Learning By Doing effort in Boulder County could bring multiple parties together to pool resources and identify projects that would benefit the aquatic environment in South Boulder Creek. Denver Water met with members of Boulder Flycasters on a virtual call on January 12, 2021, to discuss concepts for the development and implementation of a Learning By Doing approach on South Boulder Creek. Boulder Flycasters shared that they have been reaching out to partners to generate interest in the concept. Denver Water is willing to look at ways to manage water releases from Gross Reservoir to benefit the aquatic environment. This would likely fit into a Learning By Doing effort for South Boulder Creek in Boulder County and require multiple water users.
O-C-6	Learning by Doing is a collaborative, consensus-based effort for adaptive management of mitigation and enhancement efforts in Grand County. Denver Water, working with its partners, looks for opportunities to use its operational flexibility to benefit stream health, as well as pledging funds that can then be leveraged through cash and in-kind support from other partners. An active monitoring program helps track results and allow for adaptation of strategies to advance efforts that are working and adjust those that are not working.	Environmental Mitigation	Thank you for your comments. Denver Water would be interested in discussing the idea of a South Boulder Creek Learning By Doing initiative with additional stakeholders such as Boulder County.

O-C	**Boulder Flycasters Chapter of Colorado Trout Unlimited** **Date: 12-09-2020**		
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	We are ready to work with Boulder County on a similar initiative. There are likely other local watershed improvement organizations also ready to help. In closing, we ask Boulder County to elevate watershed improvement as an important area for consideration in the review process. Trout Unlimited is offering to work collaboratively with Boulder County, and other stakeholders, to define an adaptive watershed improvement process and program components as part of the 1041 application approval review.		

O-D	**Coal Creek Canyon Parks and Recreation District** **Date: 12-08-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-D-1	My name is Jeremy King and I am the current President of the Coal Creek Canyon Parks and Recreation District. I am writing to inquire more information on the Gross Damn Reservoir Project and inquire about the possible benefits to our community and organization. Please give me a call at your earliest convenience.	Community Impacts	Thank you for your comment. Denver Water would be interested in discussing the possible benefits to your organization. We had previously met with your organization in June 2016. We will reach out to schedule a meeting to further this discussion.

O-E	**The Environmental Group and Save the Colorado** **Date: 11-13-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-E-1	Members of the local community groups will be significantly and adversely affected by the proposed construction and operation of the dam and reservoir expansion. These adverse impacts include noise, dust, heavy equipment operations, traffic, air pollution, loss of property, loss of enjoyment of property, seismic and/or vibrational disturbance to property and well being, as well as other impacts. The purpose of the County's 1041 regulations is to: • "protect the beauty of the landscape • regulate projects that would otherwise cause excessive noise, water, and/or air pollution, or which would otherwise degrade or threaten existing environmental quality within the County • avoid direct conflict with adopted County land use plans • protect the public health, safety, and welfare and the environment. Boulder County Land Use Code ("Code" or "LUC") § 8-202 (B). As will be discussed herein and in our potential future comments, the significant adverse impacts of Denver Water's expansion project cannot be mitigated. As such, Boulder County must ultimately deny Denver Water's 1041 application and prevent the construction and operation of the most destructive project ever proposed in Boulder County. Denver Water's September 21, 2020 cover letter to the 1041 application requests "expeditious review and consideration" of the application. Denver Water's request should be denied because the Code does not provide any provision authorizing such a request. Further, any delay in the 1041 process has been a direct result of Denver Water's own actions. More specifically, Denver Water filed an applicability petition with the County on October 12, 2018 arguing that it was not subject to the 1041 regulations. Boulder County disagreed finding that Denver Water must submit a 1041 application to the County. Denver Water then proceeded to litigate Boulder County's finding; first administratively, then in Boulder County District Court, and ultimately in the Colorado Court of Appeals. Denver Water failed to prevail in each stage of its litigation. Ultimately, Denver Water voluntarily dismissed its appeal on July 29, 2020. Denver Water's own litigious actions resulted in a 21-month delay in processing a 1041 permit application. Given its own history of litigation and delay, the County should not expedite a 1041 process for one of the largest and most destructive projects in the County's history. Instead, the County should undertake a careful, comprehensive, and cautious review of the application that ensures robust public input at every stage of the process. Moreover, for the reasons stated below, Denver Water's 1041 is significantly incomplete. Section 8-507 of the Code states, "[b]efore any request for County approval under these regulations may be processed, a complete application…must be filed with the and Use Department." Further, the County will not commence the public hearing process until a complete application is submitted. LUC § 8-509.B. Because Denver Water's 1041 application is incomplete, the Director must issue a written finding of incompleteness and hold the application in abeyance until all deficiencies have been remedied and made available for public review of a new completeness determination on the amended application.	Environmental Impacts	Denver Water disagrees that its 1041 Permit Application is incomplete and does not meet the approval criteria. Please see Denver Water's responses to Save the Colorado and The Environmental Group's specific assertions below, as well Denver Water's other comment responses. The delay in Boulder County's processing of Denver Water's 1041 Permit Application is not a "self-made" problem. Denver Water attempted to submit a 1041 Permit Application to Boulder County in July 2019, one full year before receipt of the FERC Order. The County refused to process the application pending the outcome of Denver Water's challenge to the County's exemption determination. Following receipt of the FERC Order authorizing the GRE Project, which contains specific deadlines for the start and completion of Project construction, Denver Water felt it had no choice but to withdraw its challenge so that Boulder County would begin to process the 1041 Permit Application. Expeditious review of the 1041 Permit Application is now necessary for Denver Water's compliance with the construction deadlines in the FERC Order.

O-E	**The Environmental Group and Save the Colorado** **Date: 11-13-2020**		
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	Section 8-302 of the Code also states, "no person shall engage in any development in such area, and no activity shall be conducted, until…a permit has been issued…" For the reasons stated below, Denver Water is in violation of Section 8-302. As outlined in the attached affidavits, Denver Water has undertaken development and activities in furtherance of the project before a 1041 permit has been issued. We request that the Director make a written finding that Denver Water's has violated the moratorium provision of Section 8-302 of the Code. We also request that the Director issue a "stop work" order to Denver Water and decline to process any 1041 application until such time that Denver Water has restored to their original condition all development and activities it has undertaken without a 1041 permit. Our additional preliminary comments on Denver Water's current application, and its incompleteness, are provided below.		
O-E-2	**1. Denver Water is in violation of the moratorium provision of the Code.** Section 8-302 of the Code also states, "no person shall engage in any development in such area, and no activity shall be conducted, until…a permit has been issued…" As stated in the attached affidavit of Tim Guenthner, Denver Water has undertaken construction or activity activities related to the project. Exhibit 1 hereto. These construction activities include: • constructing a staging area on the south end of the dam. • Widening of the road from Osprey Point to the south end of the dam and on Gross Dam Road. • Tree removal • Installation of a satellite internet connection ground station. Denver Water's construction and/or activities have changed the basic character of the land. Denver Water did not possess a 1041 permit at the time it undertook this construction and/or activity. As such, Denver Water is in violation of the Section 8-302 moratorium in the Land Use Code. We request that the Director issue a "stop work" order to Denver Water and decline to process any 1041 application until such time that Denver Water has restored to their original condition all development and activities it has undertaken without a 1041 permit. **2. Denver Water's waiver request must be denied.** Claiming that the term "major facility of a public utility" does not apply to its facility, Denver Water is requesting a waiver from the following sections of the Code: §8-308.A.4.; 8-507.D.3.; and, 8-511.E. Each of these sections of the Code impose requirements for "major facilities of a public utility." The term "major facility of a public utility" is defined in the Code to include "transmission lines, power plants, and substations …" LUC § 8-210.AG. Exhibit 5e to Denver Water's 1041 application is the FERC Supplemental EA. In Exhibit 5e, Denver Water describes its facility as including: "…a powerhouse located 440 feet downstream of the valve	Compliance with Boulder County Requirements	1. Mr. Guenthner is entirely mistaken. Denver Water has not undertaken any unpermitted construction activities related to the GRE Project and no "stop work" order is warranted. Please see the attached declaration of Andy Skinner, Gross Dam Hydro Operations Supervisor, refuting Mr. Guenthner's allegations (Exhibit 32 to this response to comments submittal). 2. As explained in Denver Water's 1041 Permit Application, Boulder County staff instructed Denver Water to request a waiver of submission requirements for any provisions of the Boulder County Code Article 8 that Boulder County staff highlighted during the pre-application meeting but that Denver Water believes do not apply to the GRE Project. The code requirements applicable to "site selection and construction of major facilities of a public utility" do not apply to the GRE Project, which involves the expansion of an *existing* domestic water system under 8-308.A.2. Although the definition of "major facility of a public utility" includes transmission lines, power plants, and substations," 8-210.AG, the code goes on to explain that a permit is required only for new electric transmission lines or substations that are 115,000 volts or greater or power plants generating 50 megawatts or more, 8-403.C-E. The portions of the FERC Supplemental EA quoted by Save the Colorado show that the generators and transmission lines for the hydroelectric equipment involved in the GRE Project fall well below those thresholds. Additionally, those hydroelectric components of the GRE Project cannot serve as the basis for Boulder County's permitting authority because hydroelectric licensing and regulation is within FERC's exclusive jurisdiction under the Federal Power Act. With respect to Save the Colorado's request that Boulder County decline to process Denver Water's 1041 Permit Application, Denver Water notes that any further delay to the processing of its 1041 Permit Application would jeopardize Denver Water's ability to comply with the FERC Order, which requires construction to begin no later than July 16, 2022 and finish no later than July 16, 2027.

O-E	**The Environmental Group and Save the Colorado** **Date: 11-13-2020**		
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	house containing two 3,799-kilowatt (kW) horizontal Francis turbines connected to two 4,050-kW synchronous generators for a total installed capacity of 7,598 kW; (5) a 580-foot-long, 60-inch-diameter buried penstock; (6) a concrete tailrace structure, integral with the powerhouse outlet works building; (7) a switchyard containing project transformers; (8) a 1-mile-long, 25-kilovolt project transmission line; and (9) appurtenant facilities…" 1041 Application, Exhibit 5e, p. 2. By Denver Water's own admission, its facility includes ""transmission lines, power plants, and substations …" as defined in LUC § 8-210.AG. Further, Denver Water is a "public utility" as defined by LUC § 8-210.AS. As such, Denver Water's waiver request must be denied. The local community groups request that the County issue a written finding denying Denver Water's waiver request. The County staff has correctly found that provisions of the Code apply to this proposed project. Given its litigious history, Denver Water may attempt to appeal the County's waiver determination under Section 8-501(F) of the Code. Therefore, we ask that the County decline to process Denver Water's 1041 application until the 30-day appeal period has expired. If Denver Water does appeal the Director's waiver determination, we likewise request that the County decline to process Denver Water's application until the appeals process is complete, including any interlocutory judicial review Denver Water may seek. If Denver Water's waiver request is ultimately denied as to any provision of the Code, we request that the County find that Denver Water's 1041 application is incomplete until such time as Denver Water complies with all 1041 application requirements associated with its denied waiver request and that the County decline to process the 1041 application until the application is determined complete by the County.		
O-E-3	**3. Denver Water's 1041 application is incomplete.** **a. Denver Water's "capacity" and "need" analyses are incomplete.** Boulder County's 1041 regulations impose additional standards on "major facilities of a public utility," which includes Denver Water's Gross Reservoir expansion. LUC §8-511. Among those additional standards is the requirement to show that "[e]xisting facilities and associated systems servicing the area must be at or near operational capacity." LUC §8-511.E.3. For purposes of its 1041 application, Denver Water must show that its entire water system is at or near operational capacity. As outlined in the expert report from Peter Mayer, P.E. of Water DM dated November 9, 2020 and submitted on behalf of PLAN-Boulder County, Denver Water's 1041 application is incomplete because it has completely failed to justify the need for the dam and reservoir expansion. Exhibit 2 hereto (Mayer Report).[2] As noted in Mr. Mayer's expert report, Denver Water's 1041 application relies on an Integrated Water Resource Plan from 2002 (updated in 2004 and 2012) to justify that its existing facilities and associated systems servicing the area are at or near operational capacity. As Mr. Mayer notes: • the water demands considered by the Corps and included in Denver's Water's analysis and projections have failed to materialize. p. 2.;	Incomplete Application	Please see Denver Water's response to comment O-E-2 concerning the inapplicability of the code standards for "site selection and construction of major facilities of a public utility." Additionally, even if those standards did apply to the GRE Project, the purpose and need analysis detailed in Chapter 1 and Appendix A of the Final EIS shows why the GRE Project meets the operational capacity requirements at section 8-511.E.3 of the code. Please see Denver Water's response to comment O-K-5 concerning Mr. Mayer's letter analyzing the water demand projections for the GRE Project.

<table>
<tr><td>O-E</td><td colspan="3">The Environmental Group and Save the Colorado
Date: 11-13-2020</td></tr>
<tr><td>Comment ID</td><td>Comment</td><td>Category</td><td>Response</td></tr>
<tr><td></td><td>• Denver Water’s analysis is an outdated and highly inaccurate demand forecast. p. 2;
• Denver Water’s analysis significantly overstates future demand and is no longer a reasonable representation of likely future demand. P. 2;
• The need for expanding the Gross Reservoir no longer exists. p.2;
• The existing Gross Reservoir and capacity and reliability it already provides along Denver Water’s large integrated system appears sufficient to meet future build-out demand. p. 2;
Exhibit 2 hereto (Mayer Report).
In summary, Denver Water’s 1041 application is incomplete because it fails to present current and accurate information that the “[e]xisting facilities and associated systems servicing the area must be at or near operational capacity” as required by LUC §8-511.E.3.</td><td></td><td></td></tr>
<tr><td>O-E-4</td><td>In addition Denver Water’s application does not comply with LUC §, 8-507.D.7.a. because it includes conflicting information on the “need” for the project. 3 The need for the Moffat project is substantially over-estimated in the 1041 permit application as shown in the IRP, Exhibit 2 of the 1041 permit Figure III-4. The IRP demand forecast was produced in 2002. The Corps updated the forecast in 2010 for the Moffat FEIS.4 Per page 44 of the IRP, “Staff plans a routine review of demand forecast, making necessary adjustments at least every 5 years in the future.”
If the above statement is correct then there should be forecast revisions in 2007, 2012, and 2017. Water use by Denver Water has declined since 2002, not increased yet the demand forecast has not been revised to reflect these declines.5 Current trends in Denver Water’s actual water use show that Denver Water does not need the additional firm yield to adequately serve its customer base. Below are graphic representations of Denver Water’s inaccurate projections of water “need” compared to the actual reductions of water demand over time:
Specifically, water use in 2017, 2018, and 2019 are included in this update (See Table 1).
Table 1: Update of Actual Water Use by Denver Water Customers
<table><tr><th>Year</th><th>Treated Water (AF)</th><th>Non-Potable Water (AF)</th><th>Total Water (AF)</th><th>Non-Revenue Water (%)</th><th>Gallons Per Capita Per Day</th></tr><tr><td>2017</td><td>195,822</td><td>34,341</td><td>230,162</td><td>2.18</td><td>137</td></tr><tr><td>2018</td><td>206,074</td><td>33,215</td><td>239,289</td><td>2.18</td><td>141</td></tr><tr><td>2019</td><td>198,826</td><td>31,222</td><td>230,048</td><td>4.25</td><td>137</td></tr></table>Sources: Comprehensive Annual Financial Reports for Denver Water, 2017, 2018, and 2019. Non Potable water amounts found on pages III---21 for 2018 and 2019 and on page III---20 in the 2019 annual report.
These data are portrayed graphically in Figures 1 and 2 below.</td><td>Purpose and Need</td><td>Please see Denver Water’s responses to comments G-14 of Exhibit 19 – Referral Agency Comment and Response Table, O-K-5, and Public Individual Issue #20 (at the end of this table) for responses concerning the purpose and need statement and water demand projections for the GRE Project. As explained in more detail there, the demand projections were updated in 2012 with the most recently available demographic and socioeconomic information, and the Corps confirmed in its 2017 Record of Decision that the analyses remained accurate and reliable. The reductions in water use noted by Save the Colorado are consistent with the accelerated water conservation goals that Denver Water committed to implement as part of the GRE Project and that the Corps incorporated into its demand projections. The Corps’ analysis showed that, despite the reductions in water use resulting from Denver Water’s accelerated conservation plan, Denver Water still needs an additional 18,000 AF/yr of new firm yield.
Save the Colorado’s comment quotes Denver Water’s 2002 IRP regarding the lack of reliable water supply to the Moffat Water Treatment Plant. This quote does not undercut but rather supports the need for the GRE Project. Chapter 1 of the Final EIS for the GRE Project specifically identifies and explains that need, which has always been a central purpose for pursuing the GRE Project. See Denver Water’s response to comment O-K-5 for additional details.
Save the Colorado suggests that a “simple solution” to the system imbalance problem would be for Denver Water to “bring raw water supplies from the south to the north system for treatment at the Moffat Water Treatment Facility.” As part of the NEPA process, the Corps, together with the FERC as a cooperating agency, evaluated numerous alternatives that involved bringing water from the South System to the North System for use at the Moffat Water Treatment Plant. All such alternatives were eliminated because they would not address the reliability, vulnerability, and flexibility components of the purpose and need statement for the GRE Project.
If Gross Reservoir empties, an interconnect requires the unimpeded operation of Denver Water’s South System. Loss of operation of a portion of the South System could exacerbate the water supply reliability problem and possibly cause an interruption of</td></tr>
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	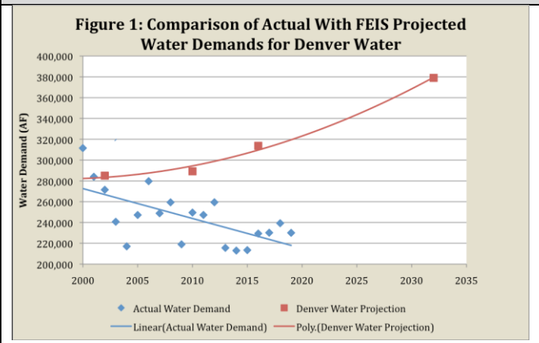 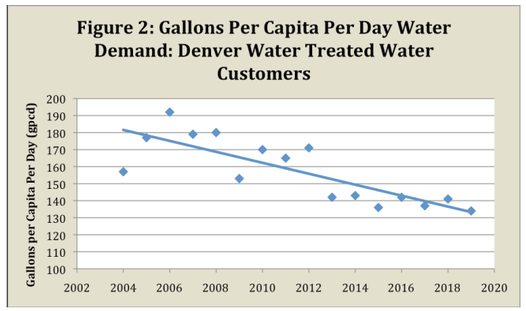 Note that the total water use is well below that projected for 2016 with conservation – 313,690 AF (shown in Table 3 of the earlier report). Also, gallons per capita per day (gpcd) for treated water use remains low at 134 in 2019. GPCD is combined with estimates of population growth to determine projected water demands. The following quote from the IRP page 52 also undercuts Denver Water's statement of "need" for the reservoir and dam expansion: "Denver Water will not be able to reliably meet demands in the north system during some dry periods due to water availability problems at the Moffat Water Treatment Plant. The cause of this problem is not lack of overall water supply available to Denver Water's system during dry periods but an unequal distribution of available water. That is, Denver Water currently has adequate water in its supply system but not enough is available for treatment at the Moffat plant." This statement in the IRP relates to the 1041 permit requirement under LUC §§ 8-507.D.b.ix.A and B. The Moffat project is certainly not the Least Environmentally Damaging Project Alternative (LEDPA) since a simple solution to the north/south imbalance would be to bring raw water supplies from the south to the north system for treatment at the Moffat Water Treatment Facility.		service to customers if water cannot be delivered via the interconnect. The lower in the South Platte River system the interconnect is located, the more vulnerable and potentially less reliable the Denver Water system is due to unplanned outages, including natural and manmade disasters. If an interconnect was located downstream of several of Denver Water's critical South System facilities, including Roberts Tunnel, Dillon Reservoir, Eleven Mile Reservoir, Cheesman Reservoir, Antero Reservoir, and Strontia Springs Reservoir, Denver Water's system would remain vulnerable to unplanned outages. Loss of operation to these South Platte River facilities could affect the ability to deliver water to a downstream interconnect. Additionally, the Corps and FERC considered various alternatives (Alternatives 2, 3, 4, 5, 10c, 10d, 10e, and 11) that used the South Platte Basin as a component of the solution. These alternatives were screened out due to the high cost of delivery to the Moffat Collection System (Screen 1C) or due to environmental impacts (Screen 2). See Chapter 2 and Appendix B of the Corps' Final EIS and the 2007 Alternatives Screening Report (Exhibit 25 to this response to comments submittal) for more information.

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O-E-5	**b. Denver Water has not submitted a CIP or master plan.** The Land Use Code requires a 1041 applicant to submit a "capital improvements plan, facilities master plan, or other acceptable master planning document." LUC §§ 8- 501.D. and 8-507.D.7. The purpose of this requirement is to "avoid piecemeal analysis of applications, and to allow for a comprehensive consideration of the cumulative impacts of development under these Regulations." LUC § 8-501.D. The undersigned have been unable to locate Denver Water's CIP or master plan for the Moffat Dam, Gross Reservoir, and related facilities. The County should find that Denver Water's 1041 application is incomplete for failure to submit the necessary future planning documents. Such documents are important for the County and the public to understand whether Denver Water has any future plans for development of the site. We request that you require Denver Water to submit all current CIPs and/or master plans through the entire life of the dam and reservoir to understand whether Denver Water has any future undisclosed development plans for the facilities and whether it is proceeding in a piecemeal fashion.	Incomplete Application	Denver Water attached all available plans for the expansion of Gross Dam and Reservoir to its 1041 Permit Application. See, particularly, Exhibits 2 and 5. Denver Water does not have a Gross Reservoir specific Capital Improvement Plan and has no further undisclosed plans for the expansion of Gross Dam or Reservoir.
O-E-6	**c. Denver Water has not analyzed impacts to all surface waters affected.** Sections 8-507.D.7.b.ii.B and C of the Land Use Code requires Denver water to map and describe "all surface waters, including applicable state water quality standards, to be affected by the project." Save the Colorado previously submitted comments identifying deficiencies with assessment of aquatic resources impacted by the project. Exhibit 10 hereto (Woodling Aquatic Resource Assessment). Save the Colorado has also submitted comments on the draft 401 Certification identifying deficiencies in both the South Boulder Creek and West Slope watersheds. Exhibit 11 hereto. The deficiencies identified in both the Woodling Report and 401 Certification comment letter are incorporated herein by reference. Further, the 1041 application does not discuss in detail source waters on the western slope in the Fraser and Williams Fork basins. It does not adequately describe immediate and long-term impact and net effects on these source water streams. Except for providing a map of the western slope watersheds that lie above the Moffat Collection System, discussions in the 1041 permit focus primarily on anticipated impacts or benefits to South Boulder Creek on the eastern slope. The 1041 application is also deficient in its failure to analyze impacts to wetlands and related resources in Grand County. Save the Colorado previously submitted comments identifying deficiencies with Denver Water's aquatic species assessment. *See*, Exhibit 12 hereto (Elliot aquatic resource report). The deficiencies identified in the Elliot report are included herein by reference. The Moffat project would increase storage capacity of Gross Reservoir by 3 times. Source waters in the Fraser and Williams Fork have already been depleted from pre-Moffat flows by between 65 and 80 percent in the irrigation season between May and July, the primary period of additional diversions for the expanded reservoir. The impact of this additional storage on source streams would be substantial. Withdrawing additional water from the western slope also increases the risk of a "compact call" in the Colorado River Basin. Storage	Colorado River Impacts	Denver Water concurs – Save the Colorado has submitted comments in previous permitting efforts and comments were addressed in those efforts. The Corps (404 Permit) and CDPHE (401 Certification) evaluated impacts to streams and wetlands on the west slope. For purposes of this 1041 Permit Application, Denver Water concentrated on impacts in Boulder County and to South Boulder Creek. On the compact call issue, please see response to comment O-A-04. As described in the 401 Certification from the CDPHE and the Corps Final EIS, impacts to water temperature were evaluated and mitigated as needed. These analyses included streams on the east and west slopes of Colorado. Lastly, flushing flows were proposed by Denver Water for several locations as mitigation and accepted by the Corps and included in the 404 Permit as conditions. Additionally, Denver Water agreed to provide flushing flows on other west slope streams in the Settlement Agreement with the USFS. All of these agreements can be found in Exhibit 5 of the 1041 Permit Application.

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	levels in both Lake Powell and Lake Mead and inflow to Lake Powell have declined during the 2000s drought period, so much so, that the risk of a compact call has increased - a development that would affect trans-mountain diversions including those through the Moffat Tunnel. Save the Colorado submitted a letter on September 8, 2016 concerning the "Joint West Slope Risk Study" describing the risk associated with a compact call on trans-mountain diversion, which is incorporated herein by reference. Exhibit 13 hereto. Denver Water must submit an antidegradation analysis for temperature and other water quality standards and requirements for these west slope streams to inform the Board of impacts. Denver Water must also provide an analysis of whether the statewide narrative sediment water quality standard (Colorado Water Quality Control Commission Regulation 31.11(1)(a)(i), 5 CCR 1002-31.11(1)(a)(i)) will be violated in both west slope streams as well as South Boulder Creek and streams on the east slope. Removing water from streams reduces the "flushing flows" needed to remove sedimentation from the stream bed. 8 Buildup of sediment in a streambed can adversely affect spawning of fish and survival of macrobenthic organisms.		
O-E-7	**d. Denver Water fails to analyze impacts from climate change.** The accuracy of Denver Water's assessment of impacts to water resources (flow, volume, temperature, etc.) over the life of the project (in perpetuity) is dependent on factoring in the effects of climate change on the proposed actions. Denver Water's 1041 application is incomplete because it does not address climate change impacts. The PACSM model used by Denver Water to assess the yield of its water system utilizes the 1953 to 1957 critical drought within the 1947 to 1991 period of record. Since then temperatures have steadily increased and the state has been in an extended drought in the 2000s. Denver Water models its water supply system under an outdated assumption that the "hydrologic and climatological cycle similar to that of water years 1947 to 1991" (page 14 of 2002 IRP, Exhibit 2 to the permit application) would repeat into the future. By 2014, when the FEIS was submitted, it was clear that climate change was changing hydrologic conditions from those between 1947 and 1991. Yet all impact analyses reported in the Moffat Project FEIS, particularly in the western streams, relied on this outdated model. In the FEIS, page ES-12 it states: "Climate change and global warming may be considered reasonably foreseeable, but currently there is no accepted scientific method for taking the general concepts associated with climate change and transforming them into incremental changes in stream flow or reservoir levels." To the contrary, there are a number of recent studies employing various methodologies to predict the future impacts of climate change on hydrology. The science of climate change has expanded exponentially in recent years with several water supply vulnerability studies completed using results of downscaled Global Climate Models. At a minimum, the hydrologic and temperature records from the mid-1980s through 2020 provide a record of how climate change has impacted streams in Colorado up to the present. The FEIS and this	Climate Change	The Corps performed analyses of GRE Project-related carbon emissions in sections 4.4, 4.6.13, 5.13, and Appendix I of the Final EIS. The Corps also responded to multiple climate change related comments, including those from Boulder County, in Appendix B to its Record of Decision. As explained in those comment responses, there is not a generally accepted scientific method by which current climate change information is translated into predictable stream flow changes and assimilated into water supply decision-making. Consequently, the Corps provided a qualitative assessment of how climate change may impact Denver Water's water supply, explaining that scientific studies have projected that since the stream flow may peak earlier, evapotranspiration may be higher and droughts may be longer and more severe, it is also likely that water demands would increase in correlation with rising air temperatures. Annual variability will increase in both directions, with wet years continuing to take place and even potentially intensifying due to a warming climate. This situation may require water managers to address greater extremes in water systems in the foreseeable future. By addressing the reliability, vulnerability and flexibility needs detailed in Chapter 1 of the Corps' Final EIS, the GRE Project would help Denver Water to manage these climate-related risks and secure the water supply for more than one quarter of Colorado's population.

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	1041 permit application ignore impacts of climate change on stream health, particularly in the western slope, and the efficacy of the expanded Gross Reservoir. In addition, on June 18, 2015 a coalition of conservation groups also submitted comments to the Army Corps of Engineers during the NEPA process highlighting the importance of consideration of climate change. Exhibit 21 hereto. The June 18, 2015 comments are incorporated herein by reference and highlight the failure of the NEPA process to consider impacts from climate change. In summary, Denver Water's 1041 application is incomplete for failure to analyze impacts from climate change.		
O-E-8	**e. Denver Water fails to analyze impacts to water wells.** Section 8-507.D.7.b.ii.D of the LUC requires Denver Water to analyze "the impacts and net effect of the activity on groundwater" including "seasonal water levels…artesian pressure…groundwater flows directions and levels…[and existing groundwater quality and classification." The 1041 permit application identified 50 wells located within 0.3 miles to the north of and others that are 1.5 miles south of Gross Reservoir. Figure 16 in Exhibit 1 of the permit application provides a map with locations of these domestic wells. Not included are required maps of seasonal water levels (1), artesian pressure in aquifers (2), groundwater flow directions and levels (3), and existing groundwater quality and classification (7). The application identified the number of wells that draw domestic water from this fractured bedrock aquifer; 3 wells with water level below ground surface of 20 to 40 feet 42 wells with water levels below ground surface of 7 to 280 feet 8 wells with water levels below ground surface of 15 to 100 feet 1 well with water levels below ground surface of 79 feet 2 wells with water levels below ground surface of 80 feet. This does not begin to evaluate how these domestic water wells may be impacted by an increase in water level in Gross Reservoir of 142 feet. One cannot discern from this information the "impact and net effect of the activity on groundwater." Since the ground surface varies for each well, both current and anticipated future water elevations are, at a minimum, required to assess these impacts. In addition, there is no discussion on how seepage losses would change due to increased head in the expanded Gross Reservoir. The only statement in the 1041 application is that "the Project would not impact water wells." This is not substantiated by data included in the permit application.	Groundwater	Please see Denver Water's response to comment O-A-05. Impacts to groundwater are discussed on page 115 to 117 of the 1041 Permit Application. This analysis was completed by the Corps for the Final EIS and concluded that seepage from the reservoir would likely increase, as would groundwater levels in the vicinity of Gross Reservoir, and groundwater discharge east of Gross Reservoir would likely rise slightly. Existing groundwater wells in the area would have an increase in available water due to the increased in storage at Gross Reservoir. The groundwater mounding effect would cause all eastward hydraulic gradients to decrease and thus decrease the eastward flow towards the reservoir.
O-E-9	**f. Denver Water's tree removal plan is deficient.** Save the Colorado previously submitted comments on deficiencies with Denver Water's vegetation removal plan. See, Exhibit 22 hereto (Smith vegetation removal report). The deficiencies noted in the Smith report are incorporated herein by reference.	Tree Removal	Denver Water will develop a final Tree Removal Plan with consultation by necessary agencies such as Boulder County and USFS. Consultation with Boulder County was not able to occur prior to the 1041 Permit Application submission. Please see response to comment F-4 of Exhibit 19 – Referral Agency Comment and Response Table for details on the schedule for the final Tree Removal Plan.

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O-E-10	**g. Important documents are missing from the application.** Important documents are missing from Denver Water's 1041 application. Instead, Denver Water has inserted "placeholders" that simply state "This page is intentionally left blank." For example, the following FEIS Appendices are missing from application Exhibit 5d2 and have been replaced with "placeholders": Appendices A-2; A-3; A-5; B-3 through B-32; Appendix C (Figures C-1 through C-5); Appendix J (all documents); Appendix L. This is not intended to be an exhaustive list of documents missing from the FEIS Appendices found at Exhibit 5d2. In addition, we were unable to find a list of all Appendices to the FEIS. If Denver Water intends to rely on the FEIS and its Appendices for purposes of the 1041 application, it must submit all such documents into the record or explain why documents are missing. **h. Numerous "plans" are missing from the application.** Several plans are promised but not included in the 1041 application. In all cases, these plans would be finalized per requirements in the FERC approval process and approved by agencies other than Boulder County, including the Forest Service, the Federal Energy Commission (FERC), and the Water Quality Control Division. These outstanding and un-submitted plans identified in the FERC approval of the project include: • Revision to South Boulder Creek Channel Stability Monitoring Plan Upstream of Gross Reservoir: Forest Service • Storm Water Management Plan • Erosion Control and Reclamation Plan; filed with the Commission's San • Francisco Regional Office for approval. • Quarry Operation Plan • Quarry Reclamation Plan • Pit Development and Reclamation Plan • Reclamation and Revegetation Seed Mixes and Mulch Materials • Dissolved Oxygen and Temperature Monitoring Plan • Tree Removal Plan • Invasive Plant and Noxious Weed Species Management Plan • Fire Management and Response Plan • Special Status Plants Relocation Plan • Aquatic Invasive Species Monitoring Plan • Traffic Management Plan • Fugitive Dust Control Plan • Road Maintenance Plan	Incomplete Application	In response to your sub-comment G: Denver Water reviewed the 1041 Permit Application materials and we acknowledge the issues with the appendices you have identified. We are attaching the complete Appendices from the Final EIS to these comment responses (see Exhibit 33). Please also note that the Final EIS and all its appendices have been publicly available on the Corps' website since April 2014: https://www.nwo.usace.army.mil/Missions/Regulatory-Program/Colorado/EIS-Moffat/ Additionally, we are attaching a table listing each of the exhibits to our original 1041 Permit Application to assist the reader with finding specific documents in the exhibits. In response to your sub-comment H: Please see the response to comment G-6 of Exhibit 19 – Referral Agency Comment and Response Table for more information.

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	• Recreation Management Plan • Visual Resources Protection Plan • Historic Properties Management Plan • South Boulder Creek Channel Stability and Monitoring Plan • Road Management Plan (USFS) • Restoration and Revegetation Plans • Emergency Action Plan • Recreation Adaptive Management Plan for Winiger Ridge The FERC review stated that because of these plans, water quality impacts would be minimized and/or controlled. However, since these plans have not been finalized prior to Boulder County review of the 1041 permit application, the Boulder county commissioners cannot be assured that the promised plans will be adequate to protect streams in the South Boulder Creek drainage during and after construction. Without the plans, the application does not comply with the requirement to submit a complete 1041 application.		

O-E-11	**i. The FEIS is deficient and cannot be relied upon.**
	Throughout the 1041 application, Denver Water defers to analysis and conclusions in the Army Corps' Environmental Impact Statement process including the Final EIS and Record of Decision. These documents have significant legal and technical deficiencies and are being challenged in litigation in federal district court in Denver. For example:
	• The Corps Record of Decision violates the National Environmental Policy Act:
	  ○ The "Purpose and Need" in the EIS is not accurate and must be redone.
	  ○ The "Alternatives" analysis in the EIS is not accurate and must be redone.
	  ○ The EIS did not analyze cumulative impacts, climate change, or a Compact Call on the Colorado River associated with, or caused by, the project.
	• The Corps Record of Decision violated the Clean Water Act:
	  ○ The Corps failed to choose the "Least Environmentally Damaging Practicable Alternative" (LEDPA).
	  ○ The full cost of the project was not considered in choosing the LEDPA.
	• The Corps Record of Decision violated the Endangered Species Act by failing to adequately consider and analyze the impacts on the green lineage cutthroat trout.
	Attached hereto are EIS comment letters substantiating these legal and technical deficiencies with the FEIS.11 We request that Boulder County refuse to rely on the FEIS and ROD until all litigation challenging these documents is completed.
		NEPA Process	Both the FERC and the Corps engaged in a robust, years-long environmental analysis of the GRE Project. Denver Water disagrees with the commenters' claims that the analyses were legally insufficient and notes that federal agency decision making is entitled to a presumption of regularity. FERC also found these analyses provided "a complete record of analysis of the environmental effects of Denver Water's proposal to amend the license for the Gross Reservoir Project." No party to the FERC process, including Boulder County, sought rehearing of FERC's Order, which is now final. Additional delay would jeopardize the schedule for the GRE Project set by the FERC Order.

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O-E-12	**j. The FERC Supplemental EA analysis is inadequate.** Denver Water's 1041 application also relies on the FERC Environmental Assessment. 1041 permit application Exhibit 5e. Save the Colorado submitted comments on the FERC EA identifying significant deficiencies with the analysis. See, Exhibit 26 hereto (April 9, 2018 FERC comment letter). The deficiencies with the FERC EA are incorporated herein by reference.	FERC Process	See response to comment O-E-11.
O-E-13	**k. There are less environmentally damaging alternatives.** In a June 14, 2016 report entitled, "The Colorado River Protection Alternative," Save the Colorado identified an array of less damaging alternatives to the Gross Reservoir and dam expansion. These alternatives include: • Improving raw water connection between Denver Water's North and • South Systems. • A bypass of Strontia Springs Reservoir. • Aquifer or gravel pit storage. • Shared operations with other water providers. • Construction of additional water treatment. • Buyback or restructure of raw water contracts. Boulder County has the legal authority to require Denver Water to analyze and present these alternatives for consideration in the 1041 permitting process. See, LUC § 8- 507.D.b.ix. The Director should find that Denver Water's 1041 application is incomplete for failure to present information on these and other alternatives to the environmentally harmful Gross Reservoir and dam expansion. The Director should order Denver Water to submit a full range of alternatives that could be employed to avoid the harmful affects of the project.	Environmental Impacts	See response to comment G-2 of Exhibit 19 – Referral Agency Comment and Response Table for more information.
O-E-14	1. Affidavit of Tim Guenthner. 2. Mayer Report 11/9/2020. 3. 10/9/15 comment letter to Corps. 4. McCurry Report. 5. 12/3/18 NEPA comment letter. 6. 12/20/16 NEPA comment letter. 7. 8/31/16 NEPA comment letter. 8. LRB 4/3/18 demand analysis. 9. 3/1/16 NEPA comment letter. 10. Woodling Report.	Attachments	Denver Water acknowledges these attachments in relation to the comments provided. See the response to comment O-E-2 as related to attachment 1. See responses to comments O-E-4 and O-K-5 as related to attachment 2. See responses to comments O-A-02 and O-E-6 as related to attachment 10. See response to comment O-E-6 as related to attachments 11-13. See response to comment O-E-7 as related to attachment 21. See response to comment O-E-9 as related to attachment 22. See response to comment O-E-12 as related to attachment 26. In relation to all remaining attachments, the Corps and FERC considered the issues raised in these attachments during the federal NEPA process. The agencies undertook a robust NEPA process over many years, including a detailed analysis of the purpose and need for the GRE Project. In addition, the Corps screened more than 300 potential water supply sources and infrastructure components and then evaluated 34 potential project alternatives in fulfillment of the NEPA and Clean Water Act requirements. As part of the process, the Corps and FERC through their federal permitting processes considered

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	11. 401 Certification comment letter. 12. Elliot aquatic report. 13. 9/18/16 Joint West Slope Risk Study. 14. Bestgen. 15. Bestgen & Poff. 16. Poff. 17. Udall & Overpeck. 18. CWCB climate report. 19. DiNatale. 20. Joint Front Range Climate Report. 21. 6/18/15 NEPA comment letter. 22. Smith vegetation study. 23. 8/27/15 NEPA comment letter. 24. 6/9/14 DEIS NEPA comment letter. 25. 8/24/19 NEPA comment letter. 26. 4/9/18 FERC comment letter. 27. Colorado River Protective Alternative.		numerous comments from a broad range of stakeholders and interested groups and individuals. Denver Water stands by the process and its conclusions.

O-F	**Boulder County Audubon Society** **Date: 11-13-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-F-1	The Boulder County Audubon Society thanks you for having asserted and successfully defended your 1041 authority over this project. We now urge you to reject Denver Water's application.	General Opposition	Thank you for your comments.
O-F-2	This massive project would result in severe deleterious effects on the environment and on the quality of life of residents of Boulder County. It would further dewater the Colorado River.	Environmental Impacts	The impact of additional water removed from the Colorado River Basin was included in the Corps' Final EIS and Record of Decision. Denver Water proposed mitigation for these impacts and those measures were approved by the Corps, CDPHE, and CPW. Additionally, Denver Water entered into agreements with the USFS, Grand County, and other entities to provide protections now and in the future for the Colorado River Basin.
O-F-3	Denver Water's assertions of need for this project are based on outdated demand estimates. It has demonstrated no need for additional transmountain diversions, nor a legitimate need for resiliency in its northern supply network.	Purpose and Need	Please see response to comment G-14 of Exhibit 19 – Referral Agency Comment and Response Table and Issue #20 (re: Purpose and Need) at the end of this table. The Corps' analysis confirmed that there is a present-day risk that Denver Water could run out of water on the northern supply network in a single dry year. Approximately 90% of Denver Water's reservoir storage sits above Strontia Springs Reservoir, and about 80% of our water supply travels through Strontia Springs Reservoir. Two of our three water treatment plants rely on water deliveries from Strontia Springs Reservoir. Any interruption to water delivery at Strontia Springs Reservoir puts our entire treatment system at risk. The Corps' analysis also showed that, even with more conservation, Denver Water has a need for the additional 18,000 AF/yr of firm yield to be developed through the GRE Project.

O-G	**The Environmental Group and Stop Gross Dam Expansion** **Date: 11-12-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-G-1	The 354 page application references nearly 16,000 pages of reference material. Essentially it regurgitates the same copious amount of data that Denver Water has used time and time again. This data is completely out of date (some of it nearly 30 years old) and lacks any detail that would allow Boulder County to make an informed decision as to whether or not the project would conform to Boulder County's 1041 Regulations. Our assertion is that there is no way it would be possible for a construction project of this size, which provides absolutely no benefit to the citizens of Boulder county, to be able to meet our strict regulations and conform to the Boulder County Comprehensive Plan. At this point though, it is clearly impossible for Boulder County to adequately determine if that is the case given the severe deficiencies in the application itself. Our team of legal and environmental experts has identified a number of specific issues with the application that are listed below. We urge you to reject the current application as incomplete and that you require Denver Water to resubmit a complete application that addresses all deficiencies, providing comprehensive data and justifications for all aspects of the project so that the county can make an informed decision.	Incomplete Application	Denver Water disagrees that the information considered during the federal permitting process is out of date. The Corps issued its Record of Decision in 2017 and the FERC issued its order in 2020. Both these agencies concluded that the analyses and information in the record, which was developed over a decade with multiple opportunities for public review and comment, was reliable and accurate to support their decisions. Denver Water believes the information is correct and accurately describes the operations of Denver Water's collection system. Thus, the impact analysis completed by the federal regulators accurately depicts impacts to resources and the mitigation proposed by Denver Water is sufficient to offset those impacts that are unavoidable. Denver Water believes that the information provided to Boulder County is sufficient to make a permitting decision. The same information has been used by multiple state and local parties to make permitting decisions and enter into binding agreements regarding impacts of the GRE Project.
P-J-aaaaa (Campaign Letter)	**First:** The 1041 application requests a "waiver" in **Section 8-503** stating that it doesn't have to comply with **Section 8-308.A.4** of the Boulder County Land Use Code. Denver Water claims that the application is not a "site selection and construction of major facilities of a public utility." Denver Water is incorrect, and therefore must comply with this section of the Land Use Code. **Second:** Denver Water's 1041 application completely fails to provide numerous "plans" about how they will construct the expansion and operate the expanded facility. In fact, the vast majority of the application simply refers to "plans" that don't yet exist which are required to exist and to be complete to comply with the Boulder County Land Use Code, including: • Tree Removal Plan • Quarry Operation Plan • Pit Development and Reclamation Plan • Stormwater Management Plan • Erosion Control Reclamation Plan • Invasive Plant and Noxious Weed Species Management Plan • Fire Management and Response Plan • Special Status Plants Relocation Plan • Aquatic Invasive Species Monitoring Plan • Traffic Management Plan • Fugitive Dust Control Plan • Recreation Management Plan	Campaign 1	[Response on waiver issue] See Denver Water's response to comment O-E-2. [Response on FERC plan issue] See Denver Water's responses to comments G-6 of Exhibit 19 – Referral Agency Comment and Response Table, and O-A-09. [Response on federal environmental analysis] Both FERC and the Corps engaged in a robust, years-long environmental analysis of the GRE Project. Denver Water disagrees with the commenters' claims that the analyses were legally insufficient and notes that federal agency decision making is entitled to a presumption of regularity. FERC also found these analyses provided "a complete record of analysis of the environmental effects of Denver Water's proposal to amend the license for the Gross Reservoir Project." No party to the FERC process, including Boulder County, sought rehearing of FERC's Order, which is now final. Additional environmental analysis of Denver Water's proposal at this stage is not necessary, would be duplicative of analyses already performed by the Corps and FERC, and would jeopardize the schedule for the GRE Project dictated by the FERC Order. [Response to compliance with Boulder Valley Plan] Denver Water would note at the outset that the commenter did not explain how the application deviates from the Boulder Valley Comprehensive Plan. Nonetheless, Section 10(a)(2)(A) of the Federal Power Act requires FERC to consider the extent to which a project is consistent with federal or state comprehensive plans for improving, developing, or conserving waterways affected by the GRE Project. Denver Water reviewed 12 federal and state comprehensive plans relevant to the expansion, including the Boulder Valley Comprehensive Plan, in developing its FERC application and identified no inconsistencies with any of the plans. FERC also reviewed the comprehensive plans and found no inconsistencies. [Response to compliance with Boulder County code requirements] These comments do not specify why the commenters believe that the GRE Project fails to meet the code requirements. For the reasons stated in Denver Water's application and these comment

O-G	**The Environmental Group and Stop Gross Dam Expansion** **Date: 11-12-2020**		
Comment ID	**Comment**	**Category**	**Response**
	• Visual Resources Protection Plan • Historic Properties Management Plan • South Boulder Creek Channel Stability and Monitoring Plan • Road Management Plan (USFS) • Road Maintenance Plan • Restoration and Revegetation Plans • Reclamation and Revegetation Seed Mixes and Mulch Materials Plan • Emergency Action Plan • Recreation Adaptive Management Plan for Winiger Ridge Boulder County cannot consider this application when these plans have not been completed. Without the plans, the application does not comply with **Section 8-511 Standards for Approval of a Permit Application** of the Land Use Code. **Third:** Throughout the application, Denver Water defers to analysis and conclusions in the Army Corps' Environmental Impact Statement process including the Final EIS and Record of Decision, which have numerous errors and are under dispute and litigation in federal district court in Denver. For example: • The Corps Record of Decision violates the National Environmental Policy Act: o The "Purpose and Need" in the EIS is not accurate and must be redone. o The "Alternatives" analysis in the EIS is not accurate and must be redone. The EIS did not analyze cumulative impacts, climate change, or a Compact Call on the Colorado River associated with, or caused by, the project. • The Corps Record of Decision violated the Clean Water Act: o The Corps failed to choose the "Least Environmentally Damaging Practicable Alternative" (LEDPA). o The full cost of the project was not considered in choosing the LEDPA. • The Corps Record of Decision violated the Endangered Species Act by failing to adequately consider and analyze the impacts on the green lineage cutthroat trout. **Fourth**: Throughout the application Denver Water defers to analysis and conclusions in the Federal Energy Regulatory Commission's license amendment process that has numerous errors including: • Failed to use an adequate alternatives analysis. • Failed to adequately consider impacts to aquatic biology and water quality in Gross Reservoir and downstream in South Boulder Creek. **Fifth:** The application fails to comply with the Boulder Valley Comprehensive Plan.		responses, Denver Water believes that it has demonstrated compliance with all approval criteria in the code. If Boulder County planning staff believe that not to be the case, Denver Water respectfully requests an opportunity to discuss the reasons for that determination.

O-G	**The Environmental Group and Stop Gross Dam Expansion** **Date: 11-12-2020**		
Comment ID	**Comment**	**Category**	**Response**
	Sixth: The application violates **Boulder County Land Use Code Section 511.C.2.a**, which requires the conservation and the full utilization of existing municipal water supplies. **Seventh:** The application violates **Boulder County Land Use Code 8-511.I.2** because it is not compatible with resource preservation and does not minimize resource damage. **Eighth:** The application violates **Boulder County Land Use Code Section 8-511.J.1** because the project is a danger to public health or safety or to property. **Ninth:** The application violates **Boulder County Land Use Code Section 8-511.J.2**, which requires compatibility with existing traffic volumes. Until such time as an application is submitted that complies with the Boulder County Land Use Code and addresses all deficiencies, Boulder County must not consider this application or deem it complete, and must return it to Denver Water for clarification and completion.		

O-H	**Americas for Conservation + the Arts (AFC+A)** **Date: 11-12-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-H-1	BUT I also want to pint out the following: I am one of a handful of residents living directly on the Gross Reservoir shore and as a Latina mother of two young girls I respectfully ask to consider the environmental justice issue related to the Boulder residents directly impacted by this expansion if approved and our #latino families in #Denver —38% of the pop.—who will bear a disproportionate burden and will pay the bill of this $400 million dam construction project that will devastate the #grossreservoir valley and watershed to the detriment of the health, safety, and environment of its residents so that Denver can have more lawns. Our Latino children will be paying most of the bill for the biggest construction project in the history of Boulder county and the tallest #dam in the state of Colorado. The construction will dynamite the valley, utterly disrupting the peace and security and health of so many and collapsing fisheries and freshwater ecosystems in the West Slope. Please lead the way in assuring that Boulder is where Our Health, Colorado & Conservation Meets a Viable and Just Future and that this build on our environmental stewardship legacy.	Environmental Justice	Environmental Justice was considered by the Corps in the Final EIS (page 5-501 Final EIS). "*Impacts to environmental justice populations were considered as part of the environmental analyses to ensure that these populations do not receive a disproportionately high number of adverse environmental or human health impacts from the Proposed Action. Extensive socioeconomic and demographic data were studied to determine if the Proposed Action would adversely affect a disproportionate number of specially designated communities. No specific ethnic or otherwise classified groups of PIA* [Primary Impact Area] *or Denver Metropolitan area, residents would be disproportionately impacted by construction or operational activities in the Proposed Action. No environmental justice issues would arise as a result of this alternative* [Gross Reservoir Expansion]." The cost of the GRE Project will be spread across all of Denver Water's customers – not just the citizens of Denver. Because of Denver Water's tiered rate structure, this increase in the water rates will be felt more by customers who use the most water. Another rate that will increase is the System Development Charge. This is paid by customers who request a new water tap from Denver Water. Thus, the new homes and businesses who need the new water supply will pay a higher portion of the GRE Project cost. Lastly, the financial impact to Denver Water customers was analyzed in the Corps' Final EIS and the Corps concluded that the GRE Project would result in a minor impact to water rates and that rate increases would occur even if the no-action alternative were selected. Please see response to comments C-4 and C-5 in Exhibit 19 – Referral Agency Comment and Response Table, for more information. The need for the GRE Project does not result from the desire to irrigate lawns. The water supply created by the GRE Project would address present-day risks created by the imbalance in Denver Water's supply system and meet future projected water demands that are driven by population, economic, demographic, and climactic changes that are out of Denver Water's control. See response to Public Issue #20 (re: Purpose & Need) at the end of this document for more information. Increased trees, landscaping and green infrastructure also are becoming even more important in Denver, which has one of the worst heat-island effects in the nation. By securing the water supply for 1.5 million people (over one quarter of Colorado's entire population), the GRE Project will help support appropriate green spaces in the city, where access to the outdoors is more limited than on the Gross Reservoir shore. Please see responses to I-9 and I-10 in Exhibit 19 – Referral Agency Comment and Response Table, for more information on Denver Water's conservation, reuse and sustainability efforts, which have won Denver Water broad recognition over the past decade.

O-I	**Sierra Club** **Date: 11-10-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-I-1	Please consider carefully what is at stake in regard to the Gross Reservoir expansion. The Sierra Club has looked carefully into Denver Water's plans and we find the environmental damage that the expansion would cause to be utterly unacceptable. A131-foot increase in dam height is massive and to do it, many trees would have to be cut down, animal habitats destroyed, Western Slope waterways disrupted, and more. Thus we have long opposed the Gross expansion.	Environmental Impacts	Please see response to Issue #20 (re: Purpose and Need) at the end of this table.
P-J-yyyyyyyyyy (Campaign Letter)	Now that Denver Water has submitted their 1041 application, we still oppose the plans to expand the reservoir. Denver Water does not seem to comprehend the environmental damage that their project will cause because their 1041 application fails to address many key concerns. Below is a list that our partners at The Environmental Group have put together that outlines the deficiencies of Denver Water's submission. We also are concerned that Denver Water's plan is so incomplete. We ask that you delay consideration of Denver Water's plan until you see clear discussion of the following. Tree Removal Plan Quarry Operation Plan Pit Development and Reclamation Plan Stormwater Management Plan Erosion Control Reclamation Plan Invasive Plant and Noxious Weed Species Management Plan Fire Management and Response Plan Special Status Plants Relocation Plan Aquatic Invasive Species Monitoring Plan Traffic Management Plan Fugitive Dust Control Plan Road Maintenance Plan Recreation Management Plan Failure to address the above concerns is reason enough to ask that Denver Water work on their 1041 application again. They need to demonstrate to residents of Boulder County that they understand the enormity of their own project and its environmental consequences. So far, they have not done that.	Campaign 1	Please see response to comment G-6 of Exhibit 19 – Referral Agency Comment and Response Table.

O-J	**Lazy Z Estates Homeowners' Association** **Date: 10-15-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-J-1	This letter serves as our strong objection to the Gross Reservoir and Dam Expansion. Our Homeowners' Association is located directly off of Lazy Z Road, and our membership would be significantly impacted by this expansion. Gross Reservoir and Dam Expansion 10 14 20.pdf	Attachments	Thank you for your comments.
O-J-2	We understand that construction trucks would be accessing the reservoir from County Road 97E, Magnolia Road and Lazy Z Road. These roads are all gravel roads and not safe for large construction vehicles. Additionally, County Road 97E is very narrow and rutted, and was not at all designed for the large construction vehicles proposed as part of the expansion. These roads are typically not well maintained by Boulder County, and we are concerned (especially now due to the financial impacts to Covid-19) about the increased vehicle traffic, and corresponding increased maintenance cost for these roads. We are further concerned that Boulder County will increase property taxes to pay for road maintenance for a project that the majority of our mountain community is adamantly opposed to.	Traffic/Transportation	Denver Water will identify road maintenance activities and schedule for that work within the final Traffic Management Plan. During construction activities, Denver Water will maintain impacted roads. As noted in comment B-29 of Exhibit 19 – Referral Agency Comment and Response Table, one of the 1041 Permit conditions will be evaluating the current condition of the road (prior to construction activities) and then revaluating the road condition after construction activities. Denver Water will then be responsible for any damage to the roads. This will prevent the cost of road damage from being the responsibility of Boulder County.
O-J-3	In addition, there will be a tremendous amount of dust, dirt and noise stirred up from the construction trucks. Our members moved to our community for the peace, solitude and beauty. We enjoy seeing the trees, flowers, and wildlife. This expansion would destroy our reasons for living here. Early estimates were that there could be 2-4 trucks per hour every hour driving up our roads, which is a substantial increase to the normal residential traffic these roads were designed and built for.	Construction Impacts	Denver Water will identify traffic volume and schedule as well as road maintenance activities and schedule to reduce dust within the final Traffic Management Plan.
O-J-4	The environmental impact on the area surrounding the existing reservoir and dam will be enormous. We have heard that the existing dam is built on a fault line, and if that is correct, a larger reservoir and dam would put additional stress on the fault line and could cause major flooding downstream if the dam were to break. We are certain the county is aware of these impacts so we will not go into additional details here. We value Boulder County's long history and commitment to championing open space, ensuring the County's natural beauty remains undisturbed, and the importance its leaders place on maintaining the quality of life for its residents. Please continue this legacy by continuing to oppose the expansion of Gross Dam Reservoir.	Environmental Impacts	Faults are common in the mountain areas and a robust Geological and Geotechnical Engineering Investigation program has been completed to ensure the design of the dam is compatible with site conditions. The design plan proposed by Denver Water will be reviewed by FERC and the SEO for safety and compliance with dam safety standards and regulations. Denver Water values the quality of open space and that was one of the factors considered when choosing to expand an existing reservoir rather than building a new reservoir. Preserving land and open space was considered when Denver Water purchased the Toll Property and entered into an agreement to transfer ownership to the USFS.

O-K	**PLAN-Boulder County** **Date: 12-08-2020**		
Comment ID	**Comment**	**Category**	**Response**
O-K-1	Please find attached a letter and report regarding the Gross Reservoir & Dam Expansion from PLAN-Boulder County. This information has also been sent to the Commissioners regular email.	Attachments	Thank you for your comments.
O-K-2	1) The dam raising would be the largest construction project in the history of Boulder County and will be hugely disruptive to the environment and region;	Construction Impacts	Thank you for your comment. Construction impacts are discussed in the response to Issue #8 (re: Construction Impacts) at the end of this table.
O-K-3	There is a crisis on the Colorado River and it is irresponsible for the East slope to divert additional water at this time;	Colorado River Impacts	The water supply created by this project is not solely from the west slope. Denver Water utilizes its west slope water supplies to supplement its east slope supplies. West slope water is only diverted to the east slope when water supplies are not adequate to meet demand.
O-K-4	**Denver doesn't need the water.** Denver has a robust water system already, without expanding Gross Reservoir. Water use in Denver, and across the region has declined. Water conservation and efficiency have been tremendously successful over the past 20 years. Additional per capita reductions are anticipated into the future.	Purpose and Need	Denver Water has implemented many conservation measures to reduce per capita use. However, population growth is expected to outpace the declines in per capita use. Over the last decade, Colorado's population growth was the eighth highest in the country by people moving into the state and fourth highest by percentage (The Center Square, Dec 30, 2019). Looking forward, Colorado's population is expected to grow by almost 50% by 2040. Please see response to Issue #20 (re: Purpose and Need) at the end of this table.
O-K-5	To specifically address Denver Water's statement of need, please find the attached expert report prepared by Peter Mayer, P.E., Principal of Water Demand Management. Mr. Mayer is a national expert in urban water systems, municipal water demands, and demand forecasting. In 2016 he testified as an Expert Witness at the U.S. Supreme Court in FL v. GA, 142 Original of behalf of the State of Georgia. Over his 25-year engineering career he has worked with hundreds of water utilities in Colorado and across the US. Mr. Mayer is also the co-chair of PLAN-Boulder County and we feel fortunate to be able to offer his expertise on this matter. Mr. Mayer's report addresses the fact that Denver Water's actual water use has declined substantially and the application for the Gross Reservoir Expansion is based on an outdated demand forecast. When an appropriate demand forecast based on current demand is employed, Denver Water's four stated reasons for why it needs the Gross Reservoir expansion become highly questionable. PLAN-Boulder urges you to review Mr. Mayer's analysis, and based on his findings to request that Denver Water resubmit their statement of need for this project with an analysis based on current water use and which takes into consideration the impacts of climate change. We also request that Mr. Mayer's report be made part of the formal record of Boulder County's 1041 review of Denver Water's proposal. It would be wrong for the Boulder County Commissioners to approve the Gross Reservoir & Dam Expansion project based on the statement of need presented by Denver Water. The attached analysis clearly shows that Denver Water is in a very different situation than it was when this project was proposed more than 20 years ago. A revised and re-analyzed statement of need is required.	Purpose and Need	Mr. Mayer's letter raises no substantially new information or concerns that the Corps and the FERC did not address through the federal NEPA process. The Corps and FERC appropriately identified the purpose and need for the GRE Project, they evaluated alternatives against that purpose and need, and they ultimately decided that Denver Water should proceed with the GRE Project. Under FERC's order, Denver Water must begin construction of the GRE Project by July 16, 2022 and complete construction by July 16, 2027, and Denver Water cannot choose to pursue an alternative not selected by the Corps and FERC. Accordingly, no further analysis of Denver Water's projected future water demands or the other needs identified in the Final EIS is warranted. Mr. Mayer's letter is not an impartial expert report, but rather is the opinion of a co-chair of PLAN-Boulder County's Board of Directors. Mr. Mayer's assertion that Denver Water has offered "shifting justification" for the GRE Project is false. Please see the attached January 2003 letter from Denver Water explaining that a central purpose of the GRE Project is to increase water-supply reliability to the Moffat Water Treatment Plant and reduce the collection system's vulnerability to a disaster (see Exhibit 34 attached to this response to comments submittal). Chapter 1 of the Corps' Final EIS ultimately identified several interconnected needs for the GRE Project, only one of which was the firm yield need. The Corps' demand analysis is not outdated. In 2012, the Corps independently verified and updated the demand analysis underlying the firm yield need using the most recently available demographic and socioeconomic information. The Corps released the updated demand analysis for public comment when it published the Final EIS in 2014 (Final EIS Chapter 1 and Appendix A), and the Corps responded to comments on the analysis when it published its Record of Decision in 2017 (Record of Decision Attachment B), ultimately finding that the demand analysis was reliable and accurate.

O-K	**PLAN-Boulder County** **Date: 12-08-2020**		
Comment ID	**Comment**	**Category**	**Response**
			The Corps' analysis already accounts for the reductions in water use that have occurred since 2010 due to Denver Water's acceleration of its conservation goals. Mr. Mayer's alternative calculations of "excess in-hand" supplies are inaccurate and misleading because he does not base his calculations on Denver Water's total water demands and his calculations do not account for periods of drought. See Chapter 1 of the Final EIS for more information on why Denver Water plans around "firm yield," which is a measure of a system's ability to reliably supply water to meet demand during drought periods. The Corps independently reviewed and accepted the analyses underlying the reliability, vulnerability and flexibility needs described in Chapter 1 of the Final EIS, and it appropriately responded to comments in Attachment B to its Record of Decision. See, for example, the Corps' response to Save the Colorado's March 2, 2016 letter, which raised arguments similar to Mr. Mayer's. No additional evaluation of these issues is warranted.

Table 4 – Issues and Comments from the Public

Commenter(s)	Comment ID No.	Summary of Issue	Response
Anita Carrick; Ann Getches; Clark R. Chapman and Y (LMC) Chapman; Frank Landis; GE Morgan; John and Carol Belcher; Kimberly Beck; Richard Reynolds; Stephen Paul; Tim Hagaman; Tom Moore; Campaign Letter 2	P-AAAAA-1; P-BBB-5; P-FFF-2; P-GGG-4; P-JJJ-4; P-MM-3; P-PPPPPPPP-2; P-Q-5; P-RRRRRR-1; P-UUUUUU-5; P-Y-2; P-ZZ-14	*Issue #1: Air Quality* Commenters asserted the GRE Project would release dust, CO_2, and other pollutants into the atmosphere during construction, contributing to declining local air quality and climate change.	An air quality analysis was completed for all emissions resulting from construction activities and a "de minimums" rating was concluded in the Corps Final EIS. Mitigation measures to address air pollution from construction activities, including truck traffic and dust suppression, will be developed as required through the CDPHE Air Pollution Control Division permit process. This issue was addressed in the FERC's responses to Issue #15 of the FERC Supplemental EA. Climate change was addressed in the FERC's responses to Issues #2 and #18 contained in the FERC Supplemental EA and is addressed below in this table under Issue #3 (re: Climate Change). Denver Water proposes multiple measures to minimize air pollution from these sources and control effects of construction on air quality. Air quality permit applications, including mitigation measures, will be prepared for construction activities and submitted to the CDPHE Air Pollution Control Division following dam design completion. A Fugitive Dust Control Plan that will include specific measures to minimize the generation of fugitive dust during construction will be prepared.
Bill Hogrewe; Clark R. Chapman and Y (LMC) Chapman; Diane Merline; Gerard Kelly; Jim Horvath; Mike Fetyko; Paul McCarthy	P-EEEEEEE-2; P-HHHH-7; P-IIIIII-10; P-KKKKKK-2; P-NNN-1; P-UU-4; P-WW-1; P-ZZ19	*Issue #2: Alternatives* Commenters expressed concerns that the application relies on the Corps ' Final EIS and Record of Decision which they assert did not adequately consider alternatives.	As part of the federal permitting process, the Corps as the lead agency, together with FERC as a cooperating agency, completed a robust alternatives analysis, screening a broad range of over 300 potential water supply sources and infrastructure components and evaluating 34 potential project alternatives, in fulfillment of the NEPA and Clean Water Act requirements. Denver Water stands by the analysis undertaken by the Corps. Please see response to comment G-2 of Exhibit 19 – Referral Agency Comment and Response Table for additional information on the alternatives analysis performed.
Anita Wilks; Art Hirsch; Bill Hogrewe; Chris Hoffman; David Bahr; John & Vicki Lemmon; Kathy Gritz; Kimberly Beck; Laurie Dameron; Mary Marsden; Patti Hirsch; Paul McCarthy; Steve Pomerance	P-HHHHHH-6; P-IIIIII-1; P-JJ-3; P-LLLLLL-3; P-NNNNN-2; P-OOOOOO-1; P-Q-6; P-QQ-2; P-QQQQQ-1; P-RRRR-1; P-UU-6; P-VVVVVVV-1; P-ZZZZZZZZZZ-2	*Issue #3: Climate Change* Commenters expressed concerns that the Final EIS did not consider climate change. Commenters assert that the GRE Project does not adequately incorporate climate change.	Please see Denver Water's responses to comments G-17 and I-9 of Exhibit 19 – Referral Agency Comment and Response Table, and O-A-3 above. This issue was addressed in the FERC's responses to Issues #2 and #18 of the FERC Supplemental EA. The removal of trees in the proposed inundation area would reduce carbon uptake, and burning the removed trees would release carbon dioxide, which is a greenhouse gas. The Corps' Final EIS on the GRE Project included detailed analysis of greenhouse gas emissions, and that analysis included contributions associated with construction. Additional information on these issues can be found in Final EIS sections 5.1.5 Terrestrial Resources, and 5.1.11, Air Quality. Further, Denver Water is not aware of any reliable models that would enable analysis of these effects on global climate conditions. In addition, the Corps addresses climate change in section 4.4 of the Final EIS, stating in part: While climate change and global warming may be considered reasonably foreseeable, currently there is no generally accepted scientific method to correlate air temperature changes with incremental changes in stream flow or reservoir levels. A qualitative evaluation of climate changes as part of the cumulative effects analysis are also presented in section 4.4 of the Final EIS. Lastly, although there is valid concern in the scientific community that global climate change may affect future water supplies in Colorado, there is little quantitative or even

Commenter(s)	Comment ID No.	Summary of Issue	Response
			qualitative data with which to accurately predict or portray these changes, and consequently with which to integrate reasonably predictable cumulative effects of the proposed actions. The absence of quantified climate-induced decreases in flows related to the proposed actions makes it impossible to evaluate the changes with more than a speculative quality.
Clark R. Chapman and Y (LMC) Chapman; Dan Feldkhun; Diane Merline; Dr. William J. Merline; Elizabeth Lamanna; Frank Landis; Katie Knapp; Kimberly Beck; Lindy Lewis; Mara Kuczun; Mary Hughes; Mary Marsden; Steve Lewis	P-A-1; P-BBBB-1; P-C-3; P-JJJ-3; P-KK-4; P-LL-4; P-LLLLLL-4; P-Q-2; P-SSS-2; P-VV-2; P-WW-5; P-Y-3; P-ZZ-7	*Issue #4: Colorado River Impacts* Commenters expressed concerns that the reservoir expansion would use water from the Colorado River.	Denver Water will adhere to Colorado Water Law regarding water rights and water supplies. Denver Water also participates in programs to recover fish species and develop and implement water saving measures to reduce the chance of a compact call in the Colorado River Basin. Additionally, impacts identified on the west slope were identified and mitigation measures proposed by Denver Water were accepted by multiple agencies and organizations including the Corps, USFS, CPW, CDPHE, and Grand County.
Arpita Kishen; Kari Manteuffel; Mary Krayer; Neil Rosenthal	P-EEE-3; P-QQQQQQQQQ-1; P-XXXXXXXXX-2; P-YYYYYYYYYY-3	*Issue #5: Community Impacts* Commenters expressed concerns that the GRE Project will negatively impact the surrounding community.	Denver Water is committed to reducing the disruptions to the local community. We have and continue to listen to the concerns from community members and organizations and consider options to reduce and mitigate impacts. As an example, because of comments made during the Corps and FERC permitting processes, the on-site quarry was relocated, and all aggregate will be made on site. This will substantially reduce the number of material hauling trucks traveling to the construction site. Denver Water will also schedule deliveries of materials to avoid busy traffic times and school buses on SH 72. Denver Water has addressed traffic and socioeconomic effects in the FERC Supplemental EA sections 5.1.9 and 5.1.8, respectively. In addition, Denver Water developed a stakeholder input-based plan to identify options for minimizing impacts analyzed in the Corps' Final EIS during the removal and disposal of trees in ways that are least disruptive to the daily lives of the local community. The Tree Removal Plan will be reviewed by agency stakeholders, including Boulder County, and will be submitted and approved by FERC.
Anita Wilks; Art Hirsch; Betsy Armstrong; Betsy R. Armstrong; Bill Ikler; Clark R. Chapman and Y (LMC) Chapman; Dan Feldkhun; Jared and Dawn Minkoff; John Lodenkamper; Kathleen Coddington; Kathy Gritz; Lindy Lewis; Mary Hughes; Maureen Lawry; Megan Wilder; Paul McCarthy; Richard OBrien; Stephen Paul; Steve Lewis; Tim Hogan; Timothy Guenthner; Tom Moore; Virginia Winter; Campaign Letter 1	P-BBB-3; P-C-1; P-CCCCC-1; P-DDDDD-1; P-GGG-1; P-HHHHHH-2; P-IIIIII-6; P-IIIIII-9; P-J-2; P-J-5; P-JJJJJJ-2; P-KK-2; P-LL-2; P-M-1; P-NNNN-5; P-NNNNNNN-2; P-OOOO-3; P-OOOOOO-6; P-OOOOOO-8; P-QQQQQ-5; P-U-1; P-WWW-2; P-WWW-8; P-WWWWW-2; P-XXX-5; P-XXXX-1; P-XXXX-2; P-XXXX-5; P-YY-1; P-YY-4; P-ZZ-3	*Issue #6: Compliance with Boulder County Requirements* Commenters listed concerns that the GRE Project would not comply with the Boulder County Comprehensive Plan or sections of the Boulder County Land Use Code. Commenters asserted zoning issues with the GRE Project and disputed the waivers requested in Denver Water's 1041 Permit Application.	The area surrounding Gross Reservoir is zoned as "Forestry" and one of the many allowed uses are water reservoirs. The Corps' Final EIS concluded that the GRE Project is not inconsistent with Boulder County's Comprehensive Plan. In fact, expansion of Gross Reservoir is not an industrial activity but is an expansion of a water supply reservoir, which is a permitted use within the Forestry zoning of Boulder County's Land Use Code Article 4, Zoning, and Land Use Code Article 8, Areas and Activities of State Interest (1041). In addition, Denver Water will obtain necessary County building, access, stormwater, transportation and other permits for construction of the GRE Project. Denver Water is complying with Boulder County requirements.
Clark R. Chapman and Y (LMC) Chapman	P-ZZ-4	*Issue #7: Compliance with USFS National Forest Plan* One commenter asserted that the reservoir expansion would be incompatible with the USFS Arapaho Roosevelt National Forest plans.	Gross Reservoir and Dam are within a federal hydropower reserve. As a result, the reserve is under the jurisdiction of FERC. Denver Water is permitted to operate the dam and reservoir under a FERC-issued license. The USFS Arapaho Roosevelt National Forest Plan identifies that Denver Water's Gross Reservoir and Dam are permitted by FERC. The USFS has jurisdiction of activities on National Forest System lands and therefore the

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			USFS has imposed conditions on Denver Water's FERC license for those National Forest System lands of the Arapaho Roosevelt National Forest occurring within the FERC boundary.
Al Evans; Allen Gordon; Anita Wilks; Arpita Kishen; Chris Rigatuso; Claudia VanWie; Dr. William J. Merline; George and Deb Craft; Lori Thorne-Smith; Victoria Capron	P-EE-1; P-EE-3; P-EEEE-1; P-HHHHHHHH-3; P-HHHHHHHHH-1; P-MMMMMMM-3; P-OOOOOO-2; P-RRRRRRRR-3; P-SSSSS-2; P-VV-8; P-YYYYYYYYY-1	*Issue #8: Construction Impacts* Commenters expressed concerns regarding the construction timeline, traffic, noise, dust, and lights.	Denver Water is working to identify and minimize project disruptions including traffic, noise, dust and light. Many of these mitigation measures will be included in the final plan development after consulting with various agencies as needed. Denver Water has sought public input on the timing of deliveries and other activities to minimize impacts to residents to incorporate into the final Traffic Management Plan and other relevant plans.
Kathleen Chippi	P-VVV-1	*Issue #9: Cultural Resources* A commenter expressed concern that the GRE Project would impact culturally modified trees (living artifacts left by the Ute and Arapahoe).	A cultural resource review was performed as part of the Corps' Final EIS process. Denver Water will follow the terms of the executed Programmatic Agreements with the State Historic Preservation Officer issued for the GRE Project. As such, Denver Water will have an on-site inspector to ensure compliance with many environmental requirements including cultural resources.
Adam Klagsbrun; Alfred McLaren; Alicia Grayson; Allen Gordon; Bill Ikler; Cara Anderson; Charley Haggans; Dan Feldkhun; Dave Perkins; Diane Bergstrom; Dr. Bea Knight-Johnson; Eliza Zimmerman; Gerard Kelly; Gordon McCurry; Heather Tsai; Isak Bromley; James Morin; Janet Robinson; Jim Drevescraft; Jim Horvath; Joe and Shelly Ceurvorst; John Malenich; John Welsch; Julie Naster; Justin Groom; Karen Gerrity; Kari Manteuffel; Kathleen Saunders; Kathy Gritz; Laurie Dameron; Lindy Lewis; Lueb Popoff and Annie Forester; M Adaline Jyurovat; Marta Lindrose; Mary Krayer; Mary Maxwell; Michelle Clopton; Ovidio Bermudez; Patricia Heaviland; Paul Delong; Paul McCarthy; Peter Leuenberger; Ray Clopton; Rhett Mitchell; Robert Dannenberg; Ronald Viviano; Sarah Hallowell; Starteya Pais; Steve Lewis; Susie Gallaudet; Suzanne Watson; Tania Corvalan; Tim Hogan; Tom Moore; Zachary Coles	P-AAA-1; P-BBBBBBBBB-1; P-C-2; P-CCCCCCC-1; P-DDD-1; P-DDDDDD-1; P-DDDDDDD-1; P-EEE-2; P-EEEEEEEEE-1; P-FFFFFF-1; P-FFFFFFF-1; P-FFFFFFF-3; P-GGG-2; P-H-1; P-HH-1; P-HHHH-2; P-HHHH-3; P-HHHH-6; P-IIIII-1; P-IIIIII-4; P-IIIIIII-1; P-IIIIIIII-1; P-IIIIIIIII-2; P-KK-3; P-KKKK-1; P-LL-3; P-MMMMMM-3; P-MMMMMMM-1; P-NNN-7; P-NNNN-6; P-OO-1; P-OOOOO-1; P-OOOOOOO-1; P-OOOOOOOO-1; P-OOOOOOOOO-1; P-PPPPP-1; P-QQQQQ-2; P-QQQQQQ-1; P-SSSSSS-1; P-SSSSSSSS-1; P-TT-3; P-TTTTTTT-1; P-UUUUUUU-1; P-UUUUUUUUUU-1; P-VVVV-1; P-VVVVVVVV-1; P-WWWWW-4; P-WWWWWWW-1; P-WWWWWWWWW-1; P-WWWWWWWWWW-1; P-XX-1; P-XXXXX-1; P-XXXXXXX-1; P-XXXXXXXX-1; P-XXXXXXXXX-1; P-XXXXXXXXXX-1; P-ZZZZZ-1; P-ZZZZZZZ-1; P-ZZZZZZZZ-3	*Issue #10: Environmental Impacts* Commenters expressed concerns that the GRE Project would be environmentally unsound or unsustainable. They cited tree removal, disruption of wildlife, road impacts, noise, decreased air quality, visual impacts, and flooding as concerns. Several commenters proposed noise mitigation.	Impacts associated with the GRE Project were identified by the Corps and mitigated through multiple agreements with several parties. Denver Water is willing to continue discussions with Boulder County to describe all the mitigation and enhancement measures associated with the GRE Project. Please see response to comment I-15 for a summary of mitigation agreed to by Denver Water. Please also see Exhibit 23, Meeting Record, containing summary notes and presentation slides from meetings with several Boulder County Departments and other referral agencies where mitigation measures on various topics were discussed. Denver Water is currently coordinating on floodplain requirements with the Boulder County Floodplain Program. Please see responses to comments contained in agency comment letter "L" of Exhibit 19 – Referral Agency Comment and Response Table, for additional details. This issue was addressed in FERC's responses to Issue # 3–5, 7–8, 12, 13, 20, and 22 of the FERC Supplemental EA. The environmental impacts of Denver Water's proposal to expand Gross Reservoir and amend its project license have been adequately evaluated through the Corps' NEPA process, which included a Draft EIS and Final EIS and FERC's Supplemental EA. Denver Water proposes multiple measures to address construction noise levels. As discussed in section 5.1.10, Aesthetics, of the FERC Supplemental EA, the effects of blasting and other construction-related noise would be addressed and minimized through measures in a series of plans that would need to be approved by FERC before any blasting or other noise-producing actions occurred. These plans will be reviewed by agency stakeholders including Boulder County. Please also see response to comment O-A-08 above regarding noise.
Art Hirsch; Jared and Dawn Minkoff; Maureen Lawry; Richard OBrien; Tim	P-HHH-1; P-HHHHHH-5; P-J-4; P-JJJJJJ-3; P-NNNN-4; P-WWW-9; P-XXX-3; P-XXXX-4; P-YY-3	*Issue #11: FERC Process* Commenters expressed concerns related to the analysis and conclusions sections in the FERC's license amendment process.	Both FERC and the Corps engaged in a robust environmental analysis of the GRE Project that lasted well over a decade and included multiple opportunities for public review and comment. FERC found these analyses provided "a complete record of analysis of the environmental effects of Denver Water's proposal to amend the license for the Gross

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Hogan; Timothy Guenthner; Virginia Winter; Campaign Letters 1 and 3			Reservoir Project." No party to the FERC process, including Boulder County, sought rehearing of FERC's Order, which is now final. Additional environmental analysis of Denver Water's proposal at this stage is not necessary, would be duplicative of analyses already performed by the Corps and FERC, and would jeopardize the schedule for the GRE Project dictated by the FERC Order. To be clear, regarding FERC's role in the GRE Project, FERC has had exclusive jurisdiction over Gross Dam and Reservoir since it first issued a license for the Project in 1951. FERC authorization is required for the reservoir expansion because FERC has comprehensive regulatory authority over GRE Project operations, including Gross Reservoir operations, under the Federal Power Act.
Adam Klagsbrun; Art Hirsch; Diane Merline; Kate Thompson; Patti Hirsch; Spencer Uniss	P-CCC-4; P-HHHHHH-7; P-MMMMMM-1; P-NNNNN-3; P-QQQ-1; P-WW-2	*Issue #12: Fish/Aquatic Biology* Commenters noted recreational fishing concerns and asserted the application did not adequately consider potential impacts to fish and aquatic biology and water quality in Gross Reservoir and downstream in South Boulder Creek.	This issue was addressed in the FERC's response to Issue #4 (re: Colorado River Impacts) of the FERC Supplemental EA. The possibility of reservoir expansion causing colder water releases to South Boulder Creek and affecting aquatic resources is discussed in Chapter 4.6.11 of the Corps' Final EIS, and in section 5.1.3.2, Water Quality, Environmental Effects, of the FERC Supplemental EA. General effects to fishing and aquatic biology are addressed in section 5.1.4, Fisheries and Aquatic Resources, of the FERC Supplemental EA. This issue was also addressed in the 401 Certification – see Rationale for CDPHE's 2016 Conditional 401 Certification "Rationales and Conditions," "Temperature" (page 10) and Appendix A. CDPHE also imposed Condition 6 on Denver Water, which requires stream temperature monitoring at four locations on South Boulder Creek.
Richard Reynolds	P-UUUUUU-3; P-UUUUUU-4	*Issue #13: Geology* A commenter expressed concern related to potential slope failure from increasing the lake level in an area of weathered soil and rock.	See sections 5.1.1, Geology and Soils, of the FERC Supplemental EA and sections 3.4, Geology, and 3.5, Soils, of the FERC Supplemental EA for additional information regarding geologic concerns. Geologic information and analysis for the 1041 Permit Application was gathered from Denver Water's License Amendment Application to the FERC (section 3.3.5). The 1041 Permit Application acknowledges the potential for slope failure. Reservoir rim instability associated with shallow slope failures could occur. However, because highly weathered granite is relatively free draining, if slope instability does occur at Gross Reservoir, they are expected to be relatively small, local features. Therefore, it is not anticipated that a landslide would involve sufficient volume to create a wave that could overtop the dam or would significantly reduce the storage volume of the reservoir. The Geotechnical Data Report, Geotechnical Design Report and Rockfall Mitigation Plan, all provided in Exhibit 12 of the 1041 Permit Application and completed in 2018, include more recent information, investigations, evaluation of effects and recommendations with regard to geologic hazards.
Anita Carrick; Anita Wilks; Bill Hogrewe; Katie Knapp; Mary Maxwell; Paul McCarthy; Campaign Letter 1	P-IIIIII-7; P-J-8; P-OOOOOO-5; P-PPPPPPPP-3; P-PPPPPPPP-6; P-SSS-1; P-UU-2; P-UUUUUUUUUU-2	*Issue #14: Health and Safety* Several commenters stated the GRE Project would affect public health and safety.	Safety of our community and employees is a top priority to Denver Water. We are designing this project with health and safety front of mind and identifying areas to reduce risk. This issue was addressed in FERC's responses to Issues #1, #7, and #10 of the FERC Supplemental EA.

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			Denver Water will mitigate project effects on traffic and public safety through implementation of its Traffic Management Plan, Fugitive Dust Control Plan, Road Maintenance Plan and Public Safety and Law Enforcement Plan. As described in the FERC Supplemental EA, these plans will be finalized in consultation with federal and state agencies and other specified entities and filed for FERC approval. See section 5.1.9, Transportation, Traffic, and Public Safety, of the FERC Supplemental EA. Denver Water is required to consult and coordinate with FERC's Division of Dam Safety and Inspections throughout the design and construction process, which only authorizes work after all pre-construction requirements are satisfied, and will conduct regular inspections of the dam during and after construction. During the design process, Denver Water has convened an Independent Board of Consultants to provide review and comment on the design. Denver Water was also required to perform a thorough and comprehensive Potential Failure Modes Analysis to fully assess any potential dam safety issues that could arise following construction. Construction will not be allowed to begin until all potential dam safety issues have been identified, evaluated, and adequately addressed.
Beverly Kurtz; Bill Ikler; Christine Jensen; Clark R. Chapman and Y (LMC) Chapman; Daniel Sokolov; David Hallock; Eliza Zimmerman; Frank Landis; Jan Burton; Jane Bunin; Janet Justice-Waddington; Jared and Dawn Minkoff; Jodi Crow; John Stevens; Joy Barrett; Karen Hollweg; Kate Thompson; Kathleen Coddington; Liz Morgan; Lyn Lowry; Mary DiGennaro; Mary Marsden; Nick Lenssen; Richard Ley Armstrong; Richard Reynolds; Silvine Farnell; Stephen Paul; Susan Merwin; Teagen Blakey; Tim Hogan; Timothy Guenthner; Virginia Winter; Campaign Letter 1	P-AAAA-1; P-AAAAAA-1; P-BBB-1; P-BBBBBB-1; P-CCC-6; P-CCC-7; P-CCC-8; P-EEEEE-1; P-EEEEEE-1; P-FFFF-1; P-FFFFFF-1; P-IIII-1; P-J-1; P-JJJ-1; P-JJJJ-1; P-JJJJJ-2; P-JJJJJJ-1; P-LLLLLL-1; P-MMM-1; P-MMMM-1; P-NNNN-2; P-OOOO-4; P-RRR-1; P-SSSS-1; P-TTTT-1; P-UUU-1; P-UUUUUU-1; P-WWW-1; P-WWW-3; P-WWW-5; P-WWW-7; P-WWWWW-1; P-XXX-4; P-XXXXXXXX-2; P-YYY-1; P-ZZ-2; P-ZZ-21; P-ZZZ-3; P-ZZZZ-1	*Issue #15: Incomplete Application* Many commenters asserted that the application was incomplete or lacked detailed plans.	Denver Water addressed all applicable criteria in the Land Use Code in its 1041 Permit Application. Denver Water is responding herein to specific requests for additional information and detail to the extent such information is available. Within the time available, we remain willing to address follow-up questions and provide additional information that would help the County in conducting its analysis of the application. For information regarding the plans required by FERC's order, please see response to comment G-6 of Exhibit 19 – Referral Agency Comment and Response Table. This issue is addressed in the FERC's response to Issue #7 of the FERC Supplemental EA. The FERC concluded that the environmental impacts of Denver Water's proposal to expand Gross Reservoir and amend its project license have been adequately evaluated through the Corps' NEPA process, which included a Draft EIS and Final EIS, in which the FERC was a cooperating agency, and in the FERC Supplemental EA. Also refer to Issue #6 (re: Compliance with Boulder County Requirements) of this table for additional details regarding the Boulder County Land Use code and the 1041 Permit Application process.
Clark R. Chapman and Y (LMC) Chapman	P-ZZ-13; P-ZZ-17	*Issue #16: Meteorology* Two commenters asserted that high winds characteristic of the corridor from Caribou and Nederland and continuing through the Reservoir and onto the Rocky Flats plains could affect the GRE Project.	As discussed in FERC Supplemental EA section 5.1.11, Air Quality, plans addressing dust control are proposed by Denver Water and are also required by USFS 4(e) Condition 19. These plans would require approval by FERC and will incorporate important local conditions such as high winds.
Art Hirsch; Betsy Armstrong; Betsy R. Armstrong; Bill Hogrewe; Christine Jensen; Clark R. Chapman and Y (LMC) Chapman; David Hallock; Gordon McCurry; Joy Barrett; Kathy Gritz; Mary Marsden; Maureen	P-BBB-2; P-DDDD-3; P-EEEEEE-3; P-FFFF-2; P-HHHHHH-4; P-J-3; P-LLLLLL-2; P-LLLLLL-6; P-M-2; P-NNNN-3; P-QQQQQ-6; P-RRR-2; P-SSSS-2; P-TT-2; P-UU-5; P-XXX-2; P-XXXX-3; P-YY-2; P-ZZ-20	*Issue #17: NEPA Process* A number of commenters asserted that the Corps' Final EIS Record of Decision violates NEPA by not establishing purpose and need or accurately analyzing alternatives.	The federal agencies undertook a robust NEPA process over more than a decade, including a detailed analysis of the purpose and need for the GRE Project. In addition, they screened more than 300 potential water supply sources and infrastructure components and then evaluated 34 potential project alternatives in fulfillment of NEPA and Clean Water Act requirements. As part of the process, the federal agencies offered numerous opportunities for public review and responded to comments received from a

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Lawry; Richard Ley Armstrong; Richard OBrien; Stephen Paul; Tim Hogan; Timothy Guenthner; Campaign Letter 1		Commenters asserted that the expansion is not necessary to provide water to downslope users, and that the Corps' Final EIS does not consider cumulative impacts, climate change, or the influences on the Colorado River.	broad range of stakeholders and interested groups and individuals. Denver Water stands by the process and its conclusions. FERC prepared its Supplemental EA specifically to review environmental effects associated with expansion of Gross Reservoir and amending the GRE Project license. The FERC found that approval of Denver Water's proposal before the Commission would not cause effects to resources in the GRE Project area exceeding those identified in the Corps' 2014 Final EIS and would, in fact, reduce the level of effects in the area.
Ann Getches; Clark R. Chapman and Y (LMC) Chapman; GE Morgan; Jared and Dawn Minkoff; Kathleen Chippi; Laurie Dameron; Stephen Paul; Tim Hagaman	P-BBB-4; P-FFF-3; P-JJ-4; P-MM-2; P-RRRRRR-4; P-VVV-2; P-WWW-4; P-ZZ-10	*Issue #18: Noise* Commenters expressed concerns regarding noise from construction activities and requested noise mitigation.	Denver Water proposes multiple measures to address construction noise levels. As discussed in section 5.1.10, Aesthetics, of the FERC Supplemental EA, the effects of blasting and other construction-related noise will be addressed and minimized through measures in a series of plans that will be approved by FERC before any blasting or other noise producing actions occur. The noise effects that will occur will not be substantially different from those identified in section 5.14.1 of the Corps' Final EIS. Please also see response to comment O-A-08.
Anita Carrick; Arpita Kishen; Brian Whitney; Inge Senglemann; Kari Manteuffel	P-AAAAAAAAAA-1; P-PPPPPPPP-4; P-SSSSSSS-2; P-XXXXXXXXX-3; P-YYYYYYYYY-4	*Issue #19: Property Values* Commenters expressed concern that the GRE Project would affect property values of nearby residents.	This issue was addressed in the response to Issue #8 of the FERC Supplemental EA. The Corps' Final EIS included review of effects to socioeconomics, including home values. A summary of that material was added to section 5.1.8 of the FERC Supplemental EA. As indicated in that section, the FERC does not believe Denver Water's proposal would result in effects to socioeconomics outside those already identified in the Corps' Final EIS.
Adam Klagsbrun; Betsy Armstrong; Clark R. Chapman and Y (LMC) Chapman; George and Deb Craft; Gerard Kelly; Gordon McCurry; Karen Tourian; Kimberly Beck; Lindy Lewis; Liz Morgan; Mark Shader; Mary Maxwell; Phil Armstrong; Phylleri Ball; Steve Lewis; Susan Merwin; Tim Hagaman; Timothy Guenthner	P-BBBBBBBBBB-3; P-DDDD-1; P-DDDDD-2; P-EEEEEEE-1; P-HHHH-1; P-HHHH-8; P-HHHHHHHH-4; P-JJJJJ-1; P-JJJJJJJJJ-1; P-KK-1; P-LL-1; P-LLLLLLL-3; P-MMMMMM-2; P-P-1; P-Q-7; P-R-1; P-SS-1; P-TT-1; P-UUUUUUUUUU-4; P-XXX-1; P-ZZ-18	*Issue #20: Purpose and Need* Commenters assert that the "Purpose and Need" section in the Final EIS is incomplete and outdated. Commenters feel Denver Water needs to make a stronger case for the GRE Project to justify the GRE Project impacts. Several commenters believe the expansion will serve additional prospective customers.	During the federal NEPA process, after offering several opportunities for public review and comment, the Corps and the FERC independently evaluated and accepted the purpose-and-need statement for the GRE Project (Final EIS Chapter 2 and Appendix A). Although most commenters on Denver Water's 1041 Permit Application focus on the issue of future water demand in isolation, the Corps and FERC agreed that Denver Water has multiple interconnected needs for the 18,000 AF/yr of annual firm yield to be supplied by the GRE Project. Not only will this water meet the projected future water demands of Denver Water's customers, the additional water supply and reservoir storage to be developed at Gross Reservoir will help to address a current imbalance between Denver Water's North and South Systems that pose a water security risk to over one quarter of Colorado's population. This imbalance is causing system-wide vulnerability issues, limits Denver Water's operational flexibility to respond to water collection system outages, and threatens Denver Water's ability to meet its present-day water needs. The Corps, together with FERC as a cooperating agency, evaluated multiple alternatives and ultimately selected the proposed expansion of Gross Dam and Reservoir to meet those needs and increase the hydroelectric power generating capacity of the dam. Denver Water cannot choose to implement an alternative not selected by the Corps and FERC, and FERC has ordered Denver Water to begin construction on the GRE Project by July 16, 2022 and to complete construction by July 16, 2027. There is no reason or opportunity to revisit the GRE Project's purpose and need or alternatives to the GRE Project at this stage of the process.

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			Denver Water has committed, under the Colorado River Cooperative Agreement (see Exhibit 5j to Denver Water's 1041 Permit Application), not to increase its service area. Denver Water nevertheless faces current risks caused by the imbalance in its supply system and projected increased water demands that are driven by population, economic, demographic and climactic changes that are out of Denver Water's control. The GRE Project, in combination with Denver Water's water conservation and recycling efforts, is designed to address these independent issues, not to drive growth in Denver Water's customer base. The Corps' and FERC's analyses showed that expansion of Gross Reservoir is the most effective and least environmentally impactful approach to meeting the purpose and need for the GRE Project. Please see Final EIS Chapters 2 and 5 for additional information.
Adam Klagsbrun; Clark R. Chapman and Y (LMC) Chapman; Dr. William J. Merline; George and Deb Craft; Harry Jacobson; Jim Horvath; Rob MacCurdy; Stephen Paul	P-BBB-8; P-HHHHHHHH-1; P-MMMMMM-4; P-NNN-5; P-QQQQQQQ-1; P-TTTTT-1; P-VV-5; P-WWWWWWWWW-2; P-ZZ-5	*Issue #21: Recreation* Commenters expressed concerns related to recreational amenities including fishing, camping, and swimming. Commenters asserted the GRE Project would cause a loss of overall recreation land area.	Recreation at Gross Reservoir will remain at the same level in both quantity and quality of amenities upon project completion. Denver Water is replacing any impacted recreation amenities one for one and relocating many of those amenities to new locations above the new high-water line. This issue was addressed in the response to Issue #3 of the FERC Supplemental EA. Effects to recreation at Gross Reservoir will be mitigated through implementation of an amended Recreation Management Plan and compliance with USFS 4(e) Condition 24. Under the amended plan, recreation facilities in the inundation area will be relocated, and effects to recreation will be addressed through monitoring and reporting, with reports filed for FERC approval every 3 years for 12 years after completion of construction. Denver Water will work to reduce effects to recreation during construction by keeping recreation sites open as much as possible without compromising public safety or construction progress, and Denver Water will post notices about temporary restrictions and closures. While recreation opportunities during construction activities will be reduced, post construction all existing opportunities will be replaced in kind.
Campaign Letter 1	P-J-7	*Issue #22: Resource Conservation* Commenters assert the GRE Project is not compatible with resource preservation and does not minimize resource damage, as required by Boulder County.	Denver Water believes the GRE Project is compatible with Boulder County's resource preservation and will minimize resource damage. To offset impacts to forested acreage that will be inundated at Gross Reservoir, Denver Water has worked with the USFS to dedicate forested parcels containing unique wetland habitat and other important conservation values for preservation as National Forest System land located near the East Portal of the Moffat Tunnel (i.e., the Toll Property parcels). This will preserve additional lands in the South Boulder Creek watershed under USFS ownership for open space and wildlife uses. Wildlife will still utilize the expanded Gross Reservoir. The increase in shoreline will create additional habitat for the aquatic and terrestrial species at Gross Reservoir. Additional information on this Toll Property ecological value can be found in Exhibit 31 of this response to comments submittal. Additionally, the Clean Water Act requires the Corps to select and permit the Least Environmentally Damaging Practicable Alternative. The Corps issued its 404 Permit identifying the GRE Project as the Least Environmentally Damaging Practicable Alternative. Denver Water and the Corps both believe the expansion of Gross Reservoir, when compared to other practicable alternatives, is the least environmentally

Commenter(s)	Comment ID No.	Summary of Issue	Response
			damaging practicable alternative available to fulfill the purpose and need for the GRE Project.
Caron Trout; Kate Thompson; Marca Hagenstad	P-BBBBBBBB-1; P-CCC-2; P-Z-1	*Issue #23: Sustainability* Commenters asserted that the GRE Project is not sustainable and does not comply with Boulder County's sustainability philosophy and mission statement.	Denver Water believes the GRE Project is sustainable as it will increase hydropower production at Gross Dam, generating a clean, emissions-free form of power that will eliminate the need for an equivalent amount of fossil-fuel produced energy, which helps conserve nonrenewable resources and decreases atmospheric pollution. Additionally, the federal and state permitting process resulted in mitigation and enhancement measures for the GRE Project, many of which have specific performance standards that Denver Water must meet.
Andrew Schelling; Anita Carrick; Anita Wilks; Ann Getches; Arpita Kishen; Art Hirsch; Avery Russell; Bill Hogrewe; Bob Bartusiak; Brian Whitney; Brooke Carrick; Chris Passarelli; Chris Rigatuso; Clark R. Chapman and Y (LMC) Chapman; David Fitchette; Dr. William J. Merline; Frank Landis; GE Morgan; Gerard Kelly; James Curfman; James M. Ausberger; James Morin; Jill Judd; Jim Drevescraft; Jim Horvath; Joe and Shelly Ceurvorst; John & Vicki Lemmon; John MacKay; John Shortridge; Justin Groom; Karen Tourian; Kari Manteuffel; Kate Thompson; Kathy Prentice; Kimberly Beck; Patti Hirsch; Paul McCarthy; Peter Leuenberger; Spencer Uniss; Stephen Paul; Steve Pomerance; Tim Hagaman; Tom Moore; Campaign Letter 1	P-AAAAAAAA-2; P-BBB-6; P-BBBBBBBBBBB-2; P-CCC-5; P-CCCCCCCC-1; P-D-1; P-DDDDDDDDD-1; P-EE-2; P-F-1; P-FFFFFFF-2; P-G-3; P-GGG-3; P-GGGG-1; P-GGGGG-1; P-GGGGG-3; P-HHHH-4; P-HHHHHH-8; P-II-1; P-IIIIII-3; P-IIIIIIIII-1; P-J-9; P-JJJ-2; P-JJJJJJJ-2; P-JJJJJJJJ-2; P-LLLLLLL-2; P-MM-1; P-NNN-4; P-NNNNN-4; P-OOOOOO-3; P-OOOOOO-7; P-PP-1; P-PPP-1; P-PPPPPPPP-1; P-Q-1; P-QQ-3; P-QQQ-2; P-QQQQ-1; P-RRRRRR-3; P-SSSSSSS-1; P-UU-3; P-VV-1; P-VVVVVVVV-2; P-WWWWWW-1; P-XXXXX-2; P-XXXXXXXXX-4; P-YYYYYYYYY-5; P-ZZ-12; P-ZZ-16; P-ZZ-8; P-ZZZZZZZZ-2; P-ZZZZZZZZZZ-3	*Issue #24: Traffic/Transportation* Commenters expressed concerns that the GRE Project would generate additional traffic. Residents and commuters in the vicinity would be impacted over the multi-year construction period.	A preliminary Traffic Management Plan will be provided to Boulder County in May 2021 and a final version in July 2021, in accordance with FERC submittal requirements. This plan will detail the volume and frequency of traffic related to the GRE Project as well as planned mitigation methods to reduce impacts to the community. This issue was addressed in the response to Issue #1 of the FERC Supplemental EA. Denver Water has addressed traffic effects in the FERC Supplemental EA section 5.1.9. In addition, Denver Water developed a stakeholder input-based plan to identify options for minimizing impacts analyzed in the Corps' Final EIS during the removal and disposal of trees in ways that are least disruptive to the daily lives of the local community. The Tree Removal Plan will be reviewed by agency stakeholders, including Boulder County, and will be submitted and approved by FERC. Community impacts were also addressed in the response to Issue #5 (re: Community Impacts) in this table.
Ann Getches; Charles Little; Dr. William J. Merline; George and Deb Craft; Jim Disinge; John Malenich; John and Carol Belcher; Kathy Gritz; Laurie Dameron; Lori Thorne-Smith; Paul Katz; Sheila Ranegar	P-AAAAAAAAA-1; P-BBBBB-1; P-H-2; P-HHHHHHHH-2; P-JJ-2; P-N-1; P-PPPPPPPPP-1; P-QQQQQ-3; P-RRRRRR-2; P-SSSSS-1; P-VV-6; P-VVVVVVVVV-2	*Issue #25: Tree Removal* Commenters expressed concerns regarding tree removal. They assert that removing more than 200,000 trees would impact wildlife habitat and remove a natural carbon sink.	The GRE Project will allow the production of additional emissions-free hydropower and Denver Water is in the process of transferring 539 acres of land (the Toll Property parcels) to the USFS for management. This issue was addressed in the response to Issue #22 of the FERC Supplemental EA. The removal of trees in the proposed inundation area will reduce carbon uptake and burning the removed trees will release carbon dioxide, which is a greenhouse gas. However, the Corps' Final EIS included detailed analysis of greenhouse gas emissions, and that analysis included contributions associated with construction. Pursuant to FERC's Order Article 423, within 1 year of the date of FERC's Order and after conferring with certain governmental stakeholders, including Boulder County, Denver Water must submit a Tree Removal Plan for FERC's review and approval. Denver Water will provide the draft Tree Removal Plan to Boulder County for review and comment in accordance with the terms of FERC's Order. The GRE Project Tree Removal

Commenter(s)	Comment ID No.	Summary of Issue	Response
			Plan will encompass approximately 486 acres. The land that will be cleared is between the elevations of 7,282 feet and 7,406 feet. Project impacts and mitigation related to vegetation and wildlife habitat are addressed in section 5.1.5.2 of the FERC Supplemental EA. The FERC Supplemental EA examines the applicable mitigation plans Denver Water would implement, once they have been finalized in consultation with the USFS, CSFS, Boulder and Jefferson counties, and the local community, and approved by the FERC. Additional information on this issue can be found in FERC Supplemental EA sections 5.1.1, Geology and Soils; 5.1.3, Water Quality; 5.1.4, Fisheries and Aquatic Resources; 5.1.5, Terrestrial Resources; 5.1.7, Recreational Resources; 5.1.8 Land Use and Socioeconomics; 5.1.9 Transportation, Traffic, and Public Safety; 5.1.10, Aesthetics; and 5.1.11, Air Quality.
Adam Klagsbrun; Al Evans; Alicia Grayson; Andrew D. Melick; Anita Wilks; Ann Getches; April Lew; Arpita Kishen; Art Hirsch; Avery Russell; Bill Hogrewe; Bill Ikler; Brian Whitney; Carol Pittman; Caron Trout; Charles Little; Charley Haggans; Clark R. Chapman and Y (LMC) Chapman; David Fitchette; Deborah Greenfeld; Diane Merline; Dr. William J. Merline; Ed and Sheila Ranegar; Eliza Zimmerman; Fred Peck; Harvey Nyberg; James Curfman; Jan Burton; Janet Justice-Waddington; Jared and Dawn Minkoff; Jim Horvath; John Bradin; John Malenich; Karen Gerrity; Kari Manteuffel; Kate Thompson; Kathleen Coddington; Kathy Peck; Kimberly Beck; Larry Utter; Laurie Dameron; Marilyn Whittaker; Mark Shader; Mark and Lynn Shader; Marta; Marta Lindrose; Mary Hughes; Mary Kramer; Mary Krayer; Mary Marsden; Patricia Eaton; Patti Hirsch; Paul McCarthy; Paula Hendricks & Norman Lederman; Pete Durkin; Richard Ley Armstrong; Starteya Pais; Tim Hagaman; Timothy Guenthner; Campaign Letters 1 and 2	P-AAAAAAAAA-2; P-B-1; P-BB-1; P-BBBBBBB-1; P-CCC-3; P-CCCC-1; P-CCCCCCCC-2; P-DDD-2; P-DDDDDDDD-1; P-EEE-1; P-FFF-1; P-FFF-4; P-FFFFFF-2; P-GGGGG-2; P-GGGGGGGGGG-1; P-H-3; P-HHHHHH-3; P-IIIIII-2; P-J-6; P-JJ-5; P-KKK-2; P-KKKKKKK-1; P-L-1; P-LLL-1; P-LLLLLL-5; P-NNN-2; P-NNNNN-1; P-NNNNNN-1; P-NNNNNNNN-3; P-O-1; P-OO-3; P-OOO-1; P-OOOO-1; P-OOOOOO-9; P-PPP-3; P-PPPPPPP-1; P-Q-4; P-RRRRRR-5; P-RRRRRRRR-1; P-RRRRRRRR-2; P-SSSS-3; P-SSSSSSS-3; P-T-1; P-U-2; P-UU-1; P-UUUU-1; P-VV-3; P-VVVV-2; P-VVVVVV-1; P-VVVVVVVVVV-1; P-WW-4; P-WWW-6; P-WWWWW-3; P-WWWWWWW-2; P-WWWWWWWW-1; P-WWWWWWWWW-3; P-XXX-6; P-XXXXXXXX-3; P-XXXXXXXX-X5; P-Y-1; P-YYY-2; P-YYYYYYYYY-2; P-Z-2; P-ZZ-9	*Issue #26: Water Conservation* Commenters state that Denver should implement water use restrictions and other conservation measures to meet water demand.	Please see response to comment I-9 of Exhibit 19 – Referral Agency Comment and Response Table.
P-AAA-4; P-BBB-7; P-HHHH-5; P-QQQQQ-4; P-WW-3	Diane Bergstrom; Diane Merline; Gerard Kelly; Kathy Gritz; Stephen Paul	*Issue #27: Water Quality*	This issue was addressed in the response to Issue #4 of the FERC Supplemental EA. The possibility of reservoir expansion affecting aquatic resources and water quality is discussed in Chapter 4.6.11 of the Corps' Final EIS, and in section 5.1.3.2, Water Quality,

Commenter(s)	Comment ID No.	Summary of Issue	Response
		Commenters asserted the GRE Project would degrade water quality including the water quality of the Fraser and Colorado rivers.	Environmental Effects, of the FERC Supplemental EA. As explained in section 5.1.3.2, flow releases under the off-license Intergovernmental Agreement would increase low winter flows and thereby reduce the potential for freezing. This issue was also addressed in the 401 Certification – see Rationale for CDPHE's 2016 Conditional 401 Certification (Exhibit 5 of the 1041 Permit Application). CDPHE also imposed Conditions 1, 2, 3, 4, 5, 7, 8, 9, 14, and 15 on Denver Water, which require stream water quality monitoring at multiple locations primarily in the Fraser River Basin. Additionally, Denver Water is also required to monitor aquatic life at four locations (Conditions 10 and 11).
P-ZZZZZZZZZZ-1	Steve Pomerance	*Issue #28: Water Rights* A commenter expressed concerns that the GRE Project would compromise junior water rights for other Front Range communities.	Denver Water will adhere to Colorado Water Law regarding water rights and water supplies. As stated in section 4.4.7 of the FERC Supplemental EA, Denver Water owns water rights that may be stored and released from Gross Reservoir in accordance with state law. Water delivered to Gross Reservoir comes from two different sources: West slope diversions via the Moffat Tunnel and native flows in South Boulder Creek. Denver Water currently holds all necessary water rights to fill the expanded reservoir.
P-AAAAAAAA-1; P-NNNNNNNN-2; P-QQ-1; P-QQ-5; P-VV-4	Chris Passarelli; Dr. William J. Merline; John & Vicki Lemmon; Pete Durkin	*Issue #29: Water Supply* Commenters asserted that insufficient water is available to fill the expanded reservoir.	See response to comment O-A-04 for additional information. Water supply was addressed in sections 1.4.4.1 through 1.4.4.4 of the Corps' Final EIS in regard to the purpose and need for the GRE Project. Water delivered to Gross Reservoir comes from two different sources: West slope diversions via the Moffat Tunnel and native flows in South Boulder Creek. The alternative selection process included in section 2 of the Corps' Final EIS evaluated the GRE Project in relation to its ability to meet the additional water supply purpose; specific components of the GRE Project are discussed in section 2.3.2.
Christine Jensen; Clark R. Chapman and Y (LMC) Chapman; Claudia VanWie; Diane Bergstrom; Jim Horvath; John and Carol Belcher; John and Carol Blecher	P-AAA-3; P-EEEE-2; P-EEEEEE-2; P-NNN-6; P-PPPP-1; P-PPPP-2; P-ZZ-15	*Issue #30: Wildfires* Commenters expressed concerns about the GRE Project increasing wildfire risks and asked about Denver Water's Fire Management and Response Plan. One commenter expressed concerns that the GRE Project would affect wildlife already affected by wildfires.	This issue is addressed in the response to Issue #21 of the FERC Supplemental EA. Fire risk and mitigation are discussed in section 5.1.5 of the FERC Supplemental EA, Terrestrial Resources. Fire preparedness and prevention will be incorporated throughout Denver Water's construction plans. Denver Water is required by FERC to develop a Fire Management and Response Plan (Condition 20) within 2 years of the issuance of the FERC Order (July 2022). Denver Water will follow fire bans and takes measures to enforce fire bans. In 2019 Denver Water installed locking mechanism on all grills in picnic areas at Gross Reservoir to prevent use during fire bans. Additionally, Denver Water hires four Boulder County Rangers to patrol Gross Reservoir during the recreation season.
Alex Mendoza; Allen Gordon; Anita Carrick; Anita Wilks; Annie Seidman; Avery Russell; Clark R. Chapman and Y (LMC) Chapman; Diane Bergstrom; Dr. William J. Merline; GE Morgan; James Curfman; Jennifer Stewart; Jill Judd; Jim Horvath; John & Vicki	P-AAA-2; P-BBBBBBBBBBB-1; P-CCCCCCCC-3; P-HHHHHHH-1; P-IIIIII-5; P-JJJJJJJ-1; P-LLLLLLL-1; P-MM-4; P-MMMMMMM-2; P-NN-1; P-NNN-3; P-OO-2; P-OOOO-2; P-OOOOOO-4; P-PPP-2; P-PPPPPPPP-5; P-QQ-4; P-S-1;	*Issue #31: Wildlife/Habitat* Commenters asserted the GRE Project would affect wildlife through construction activities and loss of wildlife habitat.	This issue was addressed in the response to Issue #20 of the FERC Supplemental EA. Additional information and analysis were included in section 5.1.5 of the FERC Supplemental EA, Terrestrial Resources to address effects of noise, lighting, habitat fragmentation, and the timing of mitigation measures on wildlife and wildlife habitat. Refer to responses to Issue #s 12 (re: Fish/Aquatic Biology), 21 (re: Recreation), and 25 (re: Tree Removal) in this table for additional detail.

Commenter(s)	Comment ID No.	Summary of Issue	Response
Lemmon; Jose Garcia; Judy Bohn; Kathleen Coddington; Marta Lindrose; Mary Maxwell; Paul McCarthy; Tim Hagaman	P-TTTTTT-1; P-UUUUUUUUUU-3; P-VV-7; P-VVVVV-2; P-ZZ-11; P-ZZ-6		Other data used was the best information at the time the analysis was completed, and Denver Water believes it is still an accurate representation of the conditions. The loss of National Forest Service lands is being more than offset in acreage and environmental resources by the transfer of the Toll Property parcels from Denver Water to the USFS.
Adam Auerbach; Allen Brow; Ann; Anna and Tony Zubricky; Annie Gaddy; Barbara Comstock; Beverly Kurtz; Bob Story; Brent Warren; Brian Whitney; Brice and Brigitte Johnson; Diane (Merline) Miller; Jane Cohen; Janice Walker; Jennifer Stewart; Jim Drevescraft; John Bradin; John MacKay; John Ryan; Kimberly Beck; Laura Downing; Mario Casilio; Michelle Courtney; Mike Fetyko; Nina Judd; Paul McCarthy; Ric Rawlins; Robert Frey; Ruth Carol and Glen Cushman; Sarah Koniewicz; Scott Fincher; Sharon Rouse; Steve Spry; Tim Hagaman; Tim Hogan; William Thomas; William Welch; Zach Pesch	P-AA-1; P-AAAAAAA-1; P-AAAAAAAAAAAA-1; P-CCCCCC-1; P-CCCCCCCCCCC-1; P-E-1; P-FF-1; P-FFF-1; P-G-1; P-G-2; P-G-4; P-GG-1; P-HHHHH-1; P-I-1; P-III-1; P-IIIIII-8; P-JJJJJJJJ-1; P-K-1; P-KKKKK-1; P-KKKKKK-1; P-KKKKKKKK-1; P-LLLL-1; P-LLLLL-1; P-MMMMM-1; P-NNNN-1; P-PPPPPP-1; P-Q-3; P-QQQQQQQQ-1; P-RRRRR-1; P-TTT-1; P-V-1; P-VVVVV-1; P-W-1; P-X-1; P-XXXXX-3; P-XXXXXX-1; P-YYYYY-1; P-YYYYYY-1; P-YYYYYYYY-1; P-ZZZ-1; P-ZZZZZZ-1	*Issue #32: General Opposition* Commenters expressed general opposition to the GRE Project. Many commenters sent campaign letters indicating opposition to the GRE Project and citing issues summarized in this table.	Thank you for your comments. Responses to your comments are included in this table.
Chris Hansen; Pete Durkin	P-NNNNNNNN-1; P-UUUUUUUU-1	*Issue #33: General Support* One commenter stated their support for the GRE Project. Another noted that the GRE Project was the compromise reached during the Two Forks cancellation and that people who purchased property in the past 30 years were aware of the planned reservoir expansion.	Thank you for your comment. The commentor is correct, a portion of the yield from the Two Forks Project is being met by the expansion of Gross Reservoir.
Jim Cowart	P-YYYYYYY-1	*Issue #34: Application Files* One commenter requested that application files be provided via zip drive.	Denver Water acknowledges this request; responding to this request is within the responsibility of Boulder County Community Planning & Permitting Department to grant.
Al Evans; Alex Markevich; Alison Harris Ludlow; Andrew Currie; Anna McDermott; Cary Paul; Charles Little; Dana Edwards; David Lucas; David William Maclennan; Eileen Kintsch; Elizabeth Garfield; Gerard Kelly; Giles Goodwin; Ginger Ikeda; Hope Prinkey; John Lodenkamper; Lucien and Anne Heart; Mikaela Ruland; Naomi Rachel; Neil Rosenthal; Paul Delong; Peter Leuenberger; Randall Philipsborn; Sarah Hallowell; Stephen	P-AAAAAAAAA-3; P-BBBBBBBBBB-1; P-CCCCCCCCC-1; P-DDDDDDD-2; P-EEEEEEEE-1; P-FFFFFFFF-1; P-FFFFFFFFF-1; P-GGGGGGG-1; P-GGGGGGGGG-1; P-GGGGGGGGG-1; P-IIIIIIIII-1; P-JJJJJJJJJ-1; P-KKKKKKKKK-1; P-LLLLLLLL-1; P-LLLLLLLLL-1; P-LLLLLLLLL-1; P-MMMMMMMM-1; P-MMMMMMMMM-1; P-MMMMMMMMM-1; P-NNNNNNN-1; P-NNNNNNNNN-1; P-OOOOOOOOO-2; P-OOOOOOOOOO-	*Issue #35: Comment Period Extension* Commenters requested an extension to the comment review period due to the large volume of application materials to review.	Denver Water notes that the Boulder County Community Planning & Permitting Department extended the referral agency review period two times during the 1041 Permit Application review process. First, on October 7, 2020, the Department granted an extension to referral agency review period until November 13, 2020; and second, on November 13, 2020, the Department granted an extension to referral agency review period until December 17, 2020.

Commenter(s)	Comment ID No.	Summary of Issue	Response
Robinson; Susie Gallaudet; Tania Corvalan; Tonya Williamson; U Kyaw Win; Uriah Beauchamp; Campaign Letter 4	1; P-QQQQQQQQQ-2; P-RRRRRRRR-1; P-TTTTTTT-2; P-TTTTTTTT-1; P-TTTTTTTTT-1; P-XXXXXXX-2; P-YYYYYYYYY-1; P-ZZZZZZZZ-1; P-ZZZZZZZZZ-1		
Anna and Tony Zubricky; Art Hirsch; Beverly Kurtz; Clark R. Chapman and Y (LMC) Chapman; Clark and Y Chapman; Kate Thompson; Laurie Dameron; Richard Reynolds	P-CCC-1; P-HHHHHH-1; P-JJ-1; P-MMMMM-2; P-RR-1; P-RR-2; P-UUUUUU-2; P-ZZ-1	*Issue #36: Attachments* Commenters attached documents to their letters to provide additional information.	These letter attachments have been broken out in the comments for individual responses. The attachment for comment P-RR-1 is included in P-ZZ-1.
See table that follows.	See table that follows.	*Issue #37: Campaign Letters* Commenters sent the same campaign letters that included the issues addressed in this table.	Denver Water has responded to comments provided in campaign letters under the issues included in this table, which documents responses to comments from organizations, and under the specific issue summaries in this table.

Table 5 – Campaign Letters

Campaign Letter Number	Number of Letters Received	Commenter(s)	Comment ID No.
Campaign 1	314	Adrienne Bielak; Al Burk; Al Gale; Alberta & Don Montgomery; Alexandra Vollmer; Allan Lazrus; Amanda Kneer; Amy Fortunato; Andre Mallinger; Andrew D. Melick; Andrew Schelling; Andrey Weinstein; Anita Nebel; Anna Poisson; Anne Pfeffer; Annie Forester; Annie Seidman; Annika Heumann; Arden Buck; Aron Ralston; Art Hirsch; Arthur J Altree; Ashleigh Shader; Ask Eloise; August Schultz; Barbara Fahey; Barbara Hofmann; Barbara Howard; Ben Lann; Ben Weber; Bernard Filla; Beryl Beauchamp; Bill Butler; Bill Jenkins; Brendt Savid; Brent Warren; Brett Curry; Brice Johnson; Brittany Olson; Brook Stableford; Brooke Watson; Bruce Doenecke; Carmi Gazit; Caroline Zug; Carolyn Elliott; Carolyn Meyer; Carolyn Stansfield; Cassandra Gobrecht; Catherine Ebeling; Catherine Grace; Charlene Kerchevall; Charlene Rush; Charles Akins; Cheryl Dzubak; Chris Rigatuso; Christopher Beers; Christopher Kahl; Cindy Patterson; Claudia Parker; Cliff Long; Clifton Bain; Cook Rodgers; Crystal Gray; Cynthia Berginc; Dakota Soifer; Dan Perez; Dana Edwards; Daniel Friend; Daniel Jacobs; Dara Rotunno; Dave Troutman; David Fulton-Beale; David Papuga; David Rodgers; David William Maclennan; Dawn Ferro; Dawn Minkoff; Deanne Grover; Dennis Manning; Devin Detwiler; Diana Leonard; Diana Maxwell; Diane Ludlow; Dianne Fleming; Diego Olaya; Don Van Wie; Donald Scott; Doug Benson; Duncan Brown; Dylan Mitchell; Eileen Kintsch; Elena Klaver; Elisa Townshend; Elizabeth Ellis; Elizabeth Lamanna; Elizabeth Mahon; Elizabeth Milford; Elizabeth Parker; Elizabeth Waldner; Ellen Gutfleisch; Ellen Middleditch; Emma Sargent; Fred Peck; GInger IKeda; Gail Storey; Gary; Gordon Reese; Greg Heiden; Greg Thomas; Gregory Pais; Gregory Riddael; Gretchen Bach; Gwendy Haas; Hans Rohner; Harry Smolker; Harvey Nyberg; Heather Lazrus; Henriette Hagg; I. Engle; Ilene Flax; JL Angell; James Morris; Jane Enterline; Janis Kelly; Jason Alexander; Jean Whitman-Shelby; Jeff Greene; Jeffry Scroggins; Jennie Hammers; Jill Ascher; Jill Powers; Jill Willson; Jim McComas; Jim and Kathy Polizzi; Jodi Connelly; Jodie Simon; Joe Greenman; John Andrews; John Campagnoli; John Reed; John Steele; John Stevens; John Wagner; Jolene Kindig; Joseph Ponisciak; Josh Harrod; Joyce Frohn; Judd Johnson; Judith Strahota; Judy Marsh; Julia Chase; Julie Shaffer; Juniper Jane Manchon; Justin Shaffer; KC Waters Guarascio; Karen Burroughs; Karen Dike; Karen Sandburg; Karen Tourian; Karin S.; Karina Black; Kate Thompson; Kate Warner; Katherine Gale; Kathleen Chippi; Kathleen Coddington; Kathleen Cravy; Kathleen Spear; Kathy Prentice; Keith Harper; Ken Bonetti; Kenneth Fisher; Kevan Krasnoff; Kim Cameron; LAURIE HALEE; Larry Barfield; Larry Utter; Laurelyn Baker; Laurence Nolan; Lawrence Crowley; Layna Melvin; Leah Johansen; Leslie Faurot; Liesl Jensen; Linda Duffy; Lindsay Alexander; Liz Morgan; Liz Vaillancourt; Loree Wilcox; Lorri Fay; Lou Vincent; Louise Murphy; Lucien and Anne Heart; Lueb Popoff; Lynn Staskal Wilson; Lyra Mayfield; Lysa Wegman-French; Maggie Boyer; Mai Lowantel-Beare; Maj Russell; Margaret Hostetter; Margaret LeCompte; Margaret McKune; Margie Robinson; Maria Michael; Marilyn Hoff; Mario Casilio; Mark Glenn; Marta; Mary Krayer; Mary Maxwell; Mary Pettigrew; Mary Russell; Matt Reynolds;	P-J-a; P-J-a1; P-J-aa; P-J-aaa; P-J-aaaa; P-J-aaaaa; P-J-aaaaaa; P-J-aaaaaaa; P-J-aaaaaaaa; P-J-aaaaaaaaa; P-J-aaaaaaaaaa; P-J-aaaaaaaaaaa; P-J-aaaaaaaaaaaa; P-J-b; P-J-bb; P-J-bbb; P-J-bbbb; P-J-bbbbb; P-J-bbbbbb; P-J-bbbbbbbb; P-J-bbbbbbbbb; P-J-bbbbbbbbbb; P-J-bbbbbbbbbbb; P-J-bbbbbbbbbbbb; P-J-c; P-J-cc; P-J-ccc; P-J-cccc; P-J-ccccc; P-J-cccccc; P-J-ccccccc; P-J-cccccccc; P-J-ccccccccc; P-J-cccccccccc; P-J-ccccccccccc; P-J-cccccccccccc; P-J-d; P-J-dd; P-J-ddd; P-J-dddd; P-J-ddddd; P-J-dddddd; P-J-ddddddd; P-J-dddddddd; P-J-ddddddddd; P-J-dddddddddd; P-J-ddddddddddd; P-J-e; P-J-eee; P-J-eeee; P-J-eeeee; P-J-eeeeee; P-J-eeeeeee; P-J-eeeeeeee; P-J-eeeeeeeee; P-J-eeeeeeeeee; P-J-eeeeeeeeeee; P-J-f; P-J-ff; P-J-fff; P-J-ffff; P-J-fffff; P-J-ffffff; P-J-fffffff; P-J-ffffffff; P-J-fffffffff; P-J-ffffffffff; P-J-fffffffffff; P-J-g; P-J-gg; P-J-ggg; P-J-gggg; P-J-ggggg; P-J-gggggg; P-J-ggggggg; P-J-gggggggg; P-J-ggggggggg; P-J-gggggggggg; P-J-ggggggggggg; P-J-h; P-J-hh; P-J-hhh; P-J-hhhh; P-J-hhhhh; P-J-hhhhhh; P-J-hhhhhhh; P-J-hhhhhhhh; P-J-hhhhhhhhh; P-J-hhhhhhhhhh; P-J-hhhhhhhhhhh; P-J-hhhhhhhhhhhh; P-J-i; P-J-ii; P-J-iii; P-J-iiii; P-J-iiiii; P-J-iiiiii; P-J-iiiiiii; P-J-iiiiiiii; P-J-iiiiiiiii; P-J-iiiiiiiiii; P-J-iiiiiiiiiii; P-J-j; P-J-jj; P-J-jjj; P-J-jjjj; P-J-jjjjj; P-J-jjjjjj; P-J-jjjjjjj; P-J-jjjjjjjj; P-J-jjjjjjjjj; P-J-jjjjjjjjjj; P-J-k; P-J-kk; P-J-kkk; P-J-kkkk; P-J-kkkkk; P-J-kkkkkk; P-J-kkkkkkk; P-J-kkkkkkkk; P-J-kkkkkkkkk; P-J-kkkkkkkkkk; P-J-kkkkkkkkkkk; P-J-l; P-J-ll; P-J-lll; P-J-llll; P-J-lllll; P-J-llllll; P-J-lllllll; P-J-llllllll; P-J-lllllllll; P-J-llllllllll; P-J-lllllllllll; P-J-m; P-J-mm; P-J-mmm; P-J-mmmm; P-J-mmmmm; P-J-mmmmmm; P-J-mmmmmmm; P-J-mmmmmmmm; P-J-mmmmmmmmm; P-J-mmmmmmmmmm; P-J-mmmmmmmmmmm; P-J-n; P-J-nn; P-J-nnn; P-J-nnnn; P-J-nnnnn; P-J-nnnnnn; P-J-nnnnnnn; P-J-nnnnnnnn; P-J-nnnnnnnnn; P-J-nnnnnnnnnn; P-J-nnnnnnnnnnn; P-J-nnnnnnnnnnnn; P-J-o; P-J-oo; P-J-ooo; P-J-oooo; P-J-ooooo; P-J-oooooo; P-J-ooooooo; P-J-oooooooo; P-J-ooooooooo; P-J-oooooooooo; P-J-ooooooooooo; P-J-p; P-J-pp; P-J-ppp; P-J-ppppp; P-J-pppppp; P-J-ppppppp; P-J-pppppppp; P-J-ppppppppp; P-J-pppppppppp; P-J-ppppppppppp; P-J-pppppppppppp; P-J-q; P-J-qq; P-J-qqq; P-J-qqqq; P-J-qqqqq; P-J-qqqqqq; P-J-qqqqqqq; P-J-qqqqqqqq; P-J-qqqqqqqqq; P-J-qqqqqqqqqq; P-J-qqqqqqqqqqq; P-J-qqqqqqqqqqqq; P-J-r; P-J-rr; P-J-rrr; P-J-rrrr; P-J-rrrrr; P-J-rrrrrr; P-J-rrrrrrr; P-J-rrrrrrrr; P-J-rrrrrrrrr; P-J-rrrrrrrrrr; P-J-rrrrrrrrrrr; P-J-rrrrrrrrrrrr; P-J-s; P-J-ss; P-J-sss; P-J-ssss; P-J-sssss; P-J-ssssss; P-J-sssssss; P-J-ssssssss; P-J-sssssssss; P-J-ssssssssss; P-J-sssssssssss; P-J-t; P-J-tt; P-J-ttt; P-J-tttt; P-J-ttttt; P-J-tttttt; P-J-ttttttt; P-J-tttttttt; P-J-ttttttttt; P-J-tttttttttt; P-J-ttttttttttt; P-J-u; P-J-uu; P-J-uuu; P-J-uuuu; P-J-uuuuu; P-J-uuuuuu; P-J-uuuuuuu; P-J-uuuuuuuu; P-J-uuuuuuuuu; P-J-uuuuuuuuuu; P-J-uuuuuuuuuuu; P-J-uuuuuuuuuuuu; P-J-v; P-J-vv; P-J-vvv; P-J-vvvv; P-J-vvvvv; P-J-vvvvvv; P-J-vvvvvvv; P-J-vvvvvvvv; P-J-vvvvvvvvv; P-J-vvvvvvvvvv; P-J-vvvvvvvvvvv; P-J-w; P-J-ww; P-J-www; P-J-wwww; P-J-wwwww; P-J-wwwwww; P-J-wwwwwww; P-J-wwwwwwww; P-J-wwwwwwwww; P-J-wwwwwwwwww; P-J-wwwwwwwwwww; P-J-x; P-J-xxx; P-J-xxxx; P-J-xxxxx; P-J-xxxxxx; P-J-xxxxxxx; P-J-xxxxxxxx; P-J-xxxxxxxxx; P-J-xxxxxxxxxx; P-J-xxxxxxxxxxx; P-J-xxxxxxxxxxxx; P-J-y; P-J-yyy; P-J-yyyy; P-J-yyyyy; P-J-yyyyyy; P-J-yyyyyyy; P-J-yyyyyyyy; P-J-yyyyyyyyy; P-J-yyyyyyyyyy; P-J-yyyyyyyyyyy; P-J-z; P-J-zz; P-J-zzz; P-J-zzzz; P-J-zzzzz; P-J-zzzzzz; P-J-zzzzzzz; P-J-zzzzzzzz; P-J-zzzzzzzzz; P-J-zzzzzzzzzz; P-J-zzzzzzzzzzz; P-J-zzzzzzzzzzzz; P-j-ee; P-j-pppp

Campaign Letter Number	Number of Letters Received	Commenter(s)	Comment ID No.
		Megan Eggers Zubaedi; Megan Ottinger; Melissa Meyers; Michael Carr; Michael Dye; Michelle Faurot; Mona Fansher; Nancy Hediger; Nancy Stocker; Nick Lenssen; Nicole Faurot; Nohn Eckert; Norval Olson; Oliver Smith; Omar Farouk Zubaedi; P Scoville; Pam Evans; Pataricia Foss; Patricia McDonald; Patrick Mullin; Peter Curia; Peter DeLong; Peter Leuenberger; Peter Rodgers; Phyllis Feigenbaum; Randy Willig; Rax Green; Rhett Mitchell; Richard Harm; Robert Ratliff; Robert Wilkinson; Roberta Koeppe; Robyn Smith; Rodney Merrill; Ronald Brown; Ronald Silver; Russ Bonny; Ryo Murraygreen; SUE FALLS; Samantha Bush; Sandra Garcia; Sandra Zinghini; Sandy Zelasko; Sarah Hamilton; Scott Peyton; Shara Johnson; Shelley Majsterek; Shivani Pechtl; Simon Trevena; Stacie Goffin; Stephanie Greenman; Stephanie Moore; Stephanie Smith; Stephanie Trasoff; Stephen La Serra; Steve Juedes Jr; Steve Sanzari-Hall; Steven Floyd; Steven Wallace; Sue Thompson; Susan Babbitt; Susan MacAulay; Susan Stephens; Suzanne Watson; Teagen Blakey; Ted Baker; Terry Tedesco; Theron Hreno; Thomas Cerny; Timothy Guenthner; Timothy Tipton; Todd Adelman; Tom Mulvany; Tracy Smith; Troy Capron; U Kyaw Win; Ursula Treves; Vicki Quarles; Victoria Miller; Virginia Schick; Wayne Hutchinson; Wayne Wathen; Wendy Frado; Wendy Kramer; Will Schaleben; William Kuepper; Wynn Waggoner; andy dieringer; john Ainsworth; thomas moore	
Campaign 2	3	Mara Kuczun; Steve Spry; Will S.	P-Y-a; P-Y-a1; P-Y-b
Campaign 3	2	Anita Wilks; Jeff Thompson	P-HHH-a; P-HHH-a1
Campaign 4	17	Art Hirsch; David Laswell; Deb Rodgers; Diane Scott; Emel Gomulka; Erin Witter; Fred Peck; Inge Sengelmann; Jill Iwaskow; Julie and Jason Faerman; Karl Freund; Kathy and Al Gale; Keith Harper; Kelley McDonald; Kim Huffman; Liz Morgan; Tom Klosowski and Ann McCampbell	P-KKKKKKKKK-a; P-KKKKKKKKK-a1; P-KKKKKKKKK-b; P-KKKKKKKKK-c; P-KKKKKKKKK-d; P-KKKKKKKKK-e; P-KKKKKKKKK-f; P-KKKKKKKKK-g; P-KKKKKKKKK-h; P-KKKKKKKKK-i; P-KKKKKKKKK-j; P-KKKKKKKKK-k; P-KKKKKKKKK-l; P-KKKKKKKKK-m; P-KKKKKKKKK-n; P-KKKKKKKKK-o; P-KKKKKKKKK-p