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March 24, 2017

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

**RE: Docket P-2035-099**

Dear Secretary Bose:

*I write today to support the Federal Energy Regulatory Commission's (FERC) approval of the Denver Board of Water Commissioners' (Denver Water) Hydropower License Amendment Application; submitted on November 23, 2016 and currently under FERC review.*

*The Greenway Foundation (TGF) is a Denver-based nonprofit organization that, for more than 40 years, has led efforts to reclaim the South Platte River and its tributaries from a virtual cesspool to a place of environmental and recreational pride. The Water Connection (TWC) is TGF's regional policy initiative that fosters civic action and technological advancement to benefit Colorado watersheds.*

*A leader in thought and practice for industry advancement and healthy watersheds, TGF, along with countless public and private based partners, has been involved in the creation of more than \$300 million in green improvements to the South Platte River and its tributaries, which has facilitated more than \$15 billion in residential, retail, commercial and entertainment development adjacent to the South Platte and its tributaries throughout the Denver Metro Area. In short, TGF knows watersheds. TGF knows the critical importance of improving watershed health and the need to support Colorado's Water Plan - the result of a statewide, multi-year effort that was the largest civic engagement process in the state's history and serves as a roadmap to lead us to the future.*

*As part of TGF's support for Colorado's Water Plan (Plan), it is TGF's position that the expansion of Gross Reservoir is consistent with the Plan's vision. Chapter 4 reads in part, "While storage is a critical element for managing Colorado's future water supplies, new storage projects may be contentious and face numerous hurdles, including permitting and funding... It may be more practical and efficient to ... enlarge an existing dam and reservoir than to build a completely new structure."*

*Beyond the Gross Reservoir Expansion Project's practicality and efficiency, and being a more palatable alternative to creating a new on-channel dam and reservoir, TGF supports the expansion because of the net environmental benefit the program - taken as a whole - will have for the state. Along with partners in various local governments and environmental groups, Denver Water has committed to millions of dollars in improvements to watershed health. The Fraser River watershed in Grand County, the South Boulder Creek watershed in Boulder County, and Blue River Watershed in Summit County will all receive quantifiable benefits. It is also important to note that FERC's approval of the application will enable Denver Water to produce additional clean, green, renewable hydropower at Gross Dam. This will benefit not just the environment, but everyone who relies on the electric grid.*

*In closing, while TGF focuses on first improving and protecting the South Platte River and its tributaries, TGF's mission is also mindful that watershed health is a statewide issue that will require statewide approach to find solutions. An expanded Gross Reservoir is consistent with Colorado's Water Plan, will provide needed certainty to Denver Water and its customers and provide undeniable environmental benefits to multiple watersheds. Not many projects can check all those boxes.*

*For the reasons stated above, TGF urges FERC to proceed with the necessary approvals to amend Denver Water's existing hydropower license; the next step to enable this critical program to move forward.*

Sincerely,

Jeff Shoemaker  
Executive Director

**"A RIVER IS MORE THAN AN AMENITY, IT IS A TREASURE" - JUSTICE OLIVER WENDELL HOLMES**

The Greenway Foundation is supported in part by a gift from the Estate of Robert V. and Billie Mae Behrent.

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