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March 30, 2017

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Via Commission's eFiling @ <http://www.ferc.gov/docs-filing/efiling.asp>

Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: GROSS RESERVOIR HYDROELECTRIC PROJECT; Public Comments
Concerning the Project No. P-2035-099 – Application for Amendment of
the Hydroelectric License of the City and County of Denver, acting by and
through its Board of Water Commissioners

Dear Sir/Madam:

I am submitting this comment letter in support of the Application for Amendment of the above-referenced Hydroelectric License ("FERC Application") for the City and County of Denver, acting by and through its Board of Water Commissioners ("Denver Water") on behalf of the Grand Valley Water Users' Association ("GVWUA"), the Orchard Mesa Irrigation District ("OMID") and the Ute Water Conservancy District ("Ute Water").

GVWUA is a Colorado non-profit corporation formed in 1905 as part of the Grand Valley Project (GV Project), a federal reclamation project constructed by the United States. GVWUA operates the GV Project under contract with the United States. The GV Project delivers irrigation water diverted from the Colorado River at the Cameo Diversion Dam to approximately 23,341 acres of land in Mesa County.

OMID is an irrigation district organized in 1904 and operating under Colorado state law. OMID became a division of the GV Project in 1922. Most of OMID's water rights are also diverted at the Cameo Diversion Dam on the Colorado River. OMID delivers irrigation water to approximately 9,200 acres of land in Mesa County.

Ute Water is a water conservancy district established in 1956 and existing under the Water Conservancy Act, section 37-45-101 *et seq.*, C.R.S. Ute Water provides domestic water to over 85,000 people in Mesa County, Colorado, and its service area currently covers approximately 240 square miles in Mesa County. Ute Water has water rights on the Colorado River and in the Plateau Valley watershed.

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All three of our clients rely on the Colorado River and have been active stewards of their water rights. Each has been involved in monitoring the on-going development on the Colorado River and the resultant increased trans-mountain diversions of Colorado River water from the West Slope to the East Slope of Colorado. In this role, it is fair to say that our clients' relationships with Denver Water have often been adversarial. However, our clients support Denver Water's current FERC Application.

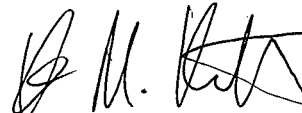
Several years ago, GVVUA, OMID and Ute Water and fourteen other governmental entities and water users on Colorado's West Slope entered the Colorado River Cooperative Agreement ("CRCA") with Denver Water. The CRCA resolved numerous controversies between the West Slope and Denver Water, and establishes numerous benefits for the West Slope. With particular relevance to Denver's pending FERC Application, the CRCA provides a series of benefits to address low-streamflow problems that arise in the headwaters of the Colorado River. Those benefits will improve the environmental health of the headwaters, will promote water-based recreation and tourism, and help numerous West Slope municipalities and water providers meet their water supply and infrastructure needs. Water provided in the headwaters of the Colorado River to address the low-stream flow problems there ultimately benefits the entire Colorado River down to the state line because this water also serves to augment stream flows downstream of the headwaters area.

In addition, the CRCA paved the way toward a new relationship between Denver Water and the West Slope. For example, the CRCA has helped resolve pending water rights litigation between Denver Water and West Slope entities, including our three clients, involving several of Denver Water's water rights on the West Slope. Furthermore, over the past year or two, Denver Water has undertaken actions and spent funds toward environmental benefits and cooperative efforts in the headwaters that the CRCA does not currently require Denver to do. Thus, the benefits of the new West Slope-Denver relationship already are being realized. This relationship will prove even more important as Colorado moves to implement its State Water Plan.

For the reasons set forth above, GVVUA, OMID and Ute Water support the issuance of a FERC license for Denver's Gross Reservoir Hydroelectric Project.

Sincerely,

WILLIAMS, TURNER & HOLMES, P.C.



Kirsten M. Kurath

KMK/mjb