



# DENVER WATER

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July 21, 2008

RE: Denver Water's Proposed Enlargement to Gross Reservoir, FERC Project No. 2035

Dear Agency or Stakeholder,

On May 1, 2008 Denver Water sent a letter to interested parties outlining the process required by FERC to amend Denver Water's current FERC license for Gross Reservoir. This letter was followed by a June 18, 2008 letter which described how the agencies and stakeholders could obtain a copy of the Pre Application Document (PAD) or Initial Consultation Document.

Since the June 18, 2008 letter, some additional information has been provided and an error was brought to our attention.

- 1) A revised "Gross Reservoir Tree Removal Plan for Pool Enlargement" (Attachment 3 to the PAD) has been posted on the Denver Water web site ([www.denverwater.org](http://www.denverwater.org)). The only change to the new version is the total tree removal of 414 acres was revised to 430 acres and subsequently Tables 2 and 3 were modified. The methods used and the cost were unchanged. As a reminder, this change was noted when the PAD was released on June 18, 2008.
- 2) Included with this letter, you will find a more detailed process timeline (Attachment A) than the one included in the May 1, 2008 letter and includes specific milestone dates.
- 3) The June 18, 2008 letter had an incorrect deadline for comments on the PAD (Initial Consultation Document). In that letter Denver Water said the deadline was August 18, 2008 (60 days from June 18). However, FERC regulation say

the deadline shall be 60 days from the public meetings. This means the actual deadline for comments to the PAD (Initial Consultation Document) is September 29, 2008.

- 4) Lastly, it was requested that we provide a specific list of the studies being conducted as part of the EIS. This list is enclosed with this letter as Attachment B.

Denver Water is sorry for any confusion the above items may have caused. As always, if you have any questions please do not hesitate to ask.

Sincerely,



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**Attachment A (July 21, 2008)**

**DENVER WATER CONSULTATION PROCESS PLAN AND SCHEDULE  
FOR PROPOSED AMENDMENT TO  
GROSS RESERVOIR HYDROELECTRIC PROJECT  
FERC PROJECT NO. 2035**

<b>Responsible Party</b>	<b>Pre-Filing Milestone</b>	<b>Date</b>	<b>FERC Regulation (18 CFR §)</b>
Denver Water	Initiate consultation with a letter to get Tribes, interested parties and resource agencies involved	5/1/08	4.38(a)(6)(v)
Interested Parties, Tribes and Agencies	Respond to Denver Water with interest in participating	5/16/08	Voluntary
Denver Water	Release initial consultation document (titled "Pre-Application Document") letter indicating document availability on Denver Water's website	6/18/08	4.38(b)(2)
Denver Water	Consult with Agencies and Tribes on public meeting agenda	7/9/08 – 7/11/08	4.38(b)(3)
Denver Water	Public notice for meetings	7/1/08, 7/14/08	4.38(b)(4)
Denver Water	Conduct public meetings and site visit	7/29/08 – 7/30-08	4.38(b)(3) and (4)
Denver Water	Provide audio recordings of public meetings to the FERC	7/31/08	4.38(b)(4)
Interested Parties, Tribes and Agencies	Provide comments to Denver Water	9/29/08	4.38(b)(5)
Denver Water	Determine if additional studies are needed, conduct any additional studies	10/08	4.38(c)
Denver Water	Provide Interested	TBD, tentatively	4.38(c)



	Parties, Tribes and Agencies the Draft Amendment Application, with Exhibit E referencing the specific parts of the Corps' DEIS that are applicable to the Application	planned for 10/08	
Interested Parties, Tribes and Agencies	Review Draft Application and provide comments	90 days from release of Draft Application	4.38(c)(5)
Denver Water	Determine if there are any disagreements, concerns; address disagreements or concerns; summarize consultation process	Following comment period	4.38(c)(6),(7), and (8)
Denver Water	File application with FERC pursuant to 4.201(c)		4.38(c)(9) and 4.201(c)

## Attachment B (July 21, 2008)

### Field Studies at Gross Reservoir for the Moffat Collection System Project EIS

**DISCLAIMER:** This table contains information provided to Denver Water by the Corps of Engineers (Corps). It provides a list of studies and resource data gathered, reviewed and/or conducted by the Corps' consultant for the Moffat Collection System Project Environmental Impact Statement (EIS). The appropriate time to ask questions or provide comments on the information provided in this table is when the Corps releases the Draft EIS (DEIS) for public comment. At that time, the DEIS will also describe the results and analysis from these reports and studies, and comments regarding that information shall be directed to the Corps during the Corps' public comment period. This table describing the studies and data already gathered relative to an enlargement of Gross Reservoir is being provided by Denver Water, with the permission of the Corps, to allow the stakeholders, agencies and Tribes to comment to Denver Water during Denver Water's FERC consultation process pursuant to 18 CFR §4.38. This information will aid the participant in the consultation process in commenting to Denver Water about any additional resource information, data, or studies that the participant believes should be addressed in Denver Water's FERC amendment application. Based on this information and the proposed studies described in Denver Water's June 18, 2008 Pre Application Document, the participant is asked to identify any additional studies to be performed or information to be gathered; discuss its understanding of the resource issues and the goals and objectives for these resources; explain why each study methodology recommended by it is more appropriate; document that the use of each study methodology recommended is a generally accepted practice; and explain how the studies and information requested will be useful in furthering its resources goals. Comments on additional study and information needs can be made at the public meetings, but participants in the consultation process are encouraged to provide written comments to Denver Water via the contact provided in the Pre-Application Document. Please note that the comment deadline was corrected from the August 18<sup>th</sup> date to September 29, 2008.

Resource	Methodology
Surface Water	<ul style="list-style-type: none"> <li>• Summarized average, dry, and wet year end-of-month contents, surface elevations, and surface area at Gross Reservoir based on PACSM output between 1947-1991</li> <li>• Used PACSM, flow duration curves, and hydrographs to assess potential stream flow changes (e.g. maximum daily flow changes, % flow change) in South Boulder Creek</li> <li>• Assessed and compared stream hydraulics and sediment transport capacity/discharge at representative sampling sites in South Boulder Creek using HEC-RAS computer software (e.g. cross-sectional geometry, slope, and resistance and flow parameters) and the Meyer-Peter Muller general transport equation</li> <li>• Prepared a separate technical report on channel conditions)</li> <li>• Water Quality in South Boulder Creek was assessed using data from Denver Water's sampling program (i.e. upstream and downstream of Moffat Tunnel), Colorado River Watch, and USGS Site 6729500; Data</li> </ul>



	<p>was analyzed based on CDPHE's <i>Antidegradation Significance Determination for New or Increases in Water Quality Impacts Procedural Guidance</i> (2001)</p>
Soils	<ul style="list-style-type: none"> <li>• Existing literature and data (i.e. published soil surveys, GIS soils data provided by USFS)</li> <li>• Field visit to assess slope stability and erosion issues around Gross Reservoir</li> </ul>
Vegetation	<ul style="list-style-type: none"> <li>• Vegetation at Gross Reservoir was surveyed and mapped by foot to identify plant community associations and dominant species</li> <li>• Observations of plant communities were compared with the cover type classification system used by Colorado Natural Diversity Information Source (NDIS)</li> <li>• Noxious weeds communities were identified and classified per the Colorado Department of Agriculture's (i.e. List A, List B, and List C) and County lists</li> <li>• Identified sensitive vegetation communities based on the Colorado Natural Heritage Program (CHNP) database</li> </ul>
Riparian and Wetland Areas	<ul style="list-style-type: none"> <li>• Field delineation of wetlands, riparian areas, and other waters of the U.S. for Gross Reservoir, South Boulder Creek, Winiger Gulch tributary, Winiger Ridge tributary, Forsythe Gulch, and two unnamed southern tributaries to Gross Reservoir</li> <li>• Field delineations were conducted using Routine Determination as described in the <i>1987 Corps of Engineers Wetlands Delineation Manual</i> (Environmental Laboratory 1987)</li> <li>• Wetlands were classified using the <i>Classification of Wetlands and Deepwater Habitats of the United States</i> (Cowardin et al., 1979)</li> <li>• Functional analyses of wetlands were assessed using a modified version of the Montana Department Transportation Wetland Functional Assessment Method (Bergland 1999)</li> <li>• Riparian communities were classified using the associations defined in the <i>Field Guide to Wetland and Riparian Plant Associations of Colorado</i> (Carsey et al. 2003)</li> </ul>
Wildlife	<ul style="list-style-type: none"> <li>• Conducted wildlife habitat and species distribution assessments around Gross Reservoir using aerial photography, information from NDIS, and previous studies conducted in the study area</li> <li>• Mapped prairie dog towns, raptor nests, areas of concentrated big game use, and other important wildlife habitats</li> </ul>
Special Status Species	<ul style="list-style-type: none"> <li>• Conducted habitat evaluation for presence/absence surveys for Preble's meadow jumping mouse (PMJM) in Forsythe Canyon, Winiger Gulch, and the Gross Reservoir inlet on South Boulder Creek</li> <li>• Conducted field work to identify bald eagle nests and slender moonwort habitat and/or populations</li> <li>• Obtained information from the USFWS, CHNP element occurrence data, the NDIS' website of species' ranges, USFS Region 2 Sensitive Species information, previous studies and reports, and other literature searches</li> <li>• Consulted with the USFWS</li> </ul>
Aquatic Biological Resources	<ul style="list-style-type: none"> <li>• Assessed South Boulder Creek from 1) Moffat Tunnel to Gross Reservoir and 2) Gross Reservoir to the South Boulder Diversion Canal</li> <li>• Evaluated fish data from periodically sampling that has occurred since the 1960s by the Colorado Division of Wildlife (CDO)</li> <li>• Evaluated benthic macroinvertebrate populations from data collected</li> </ul>

	<p>by Chadwick &amp; Associates, Inc. in 1984 and 1985</p> <ul style="list-style-type: none"> <li>• Evaluated habitat using Instream Flow Incremental and Methodology (IFIM) simulations and some information from the Metropolitan Denver Water Supply EIS (Corps 1988)</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>• Conducted a site assessment to verify access, capacity, and condition of roads</li> </ul>
Recreation	<ul style="list-style-type: none"> <li>• Reviewed Denver Water data on vehicle counts for visitation</li> <li>• Assessed designated and planned recreational facilities at Gross Reservoir</li> <li>• Assessed USFS lands in the study area managed under the Roaded Natural (RN) and Semi-Primitive Motorized (SPM) Recreation Opportunity Spectrum (ROS) classes</li> <li>• Coordination with Denver Water regarding ongoing updates to the Gross Reservoir Recreation Management Plan</li> </ul>
Land Use	<ul style="list-style-type: none"> <li>• Field observations to assess baseline land use patterns, including type, level, and frequency of use</li> <li>• Assessed areas of potential land use conflicts or sensitive land uses</li> </ul>
Visual Resources	<ul style="list-style-type: none"> <li>• Reconnaissance survey of the inundation, dam design, disturbance areas, and construction of associated facilities as perceived from local roads, residences, and recreational sites</li> <li>• Acquired source imagery for photo simulations, assessed visual characteristics and landmarks, established key observations points, and described the area's scenic integrity and visual absorption capacity</li> </ul>
Cultural Resources	<ul style="list-style-type: none"> <li>• Class III pedestrian surveys of cultural resources inventory and un-inventories areas within the Area of Potential Effect (APE) (i.e. areas to be impacted by construction; the largest pool enlargement plus a 100-foot buffer)</li> <li>• Held a meeting with the USFS Arapahoe and Roosevelt National Forest Supervisor's office in Fort Collins on 11/17/2005</li> </ul>
Hazardous Materials	<ul style="list-style-type: none"> <li>• Conducted presence/absence of hazardous materials within or adjacent to the study area from data compiled from various federal (Environmental Protection Agency [EPA] and state (CDPHE) data bases</li> <li>• Conducted a site visit at the base of Gross Reservoir Dam and the Gross Reservoir Maintenance Facility</li> </ul>
Socioeconomics	<ul style="list-style-type: none"> <li>• Reviewed and collected information from federal (e.g. U.S Census Bureau, U.S. Bureau of Labor Statistics, and U.S. Bureau of Economic Analysis), state, and local entities (e.g. Denver Regional Council of Governments [DRCOG])</li> <li>• Conducted interviews with individuals responsible for public facilities and services</li> </ul>

Notes:

\* This table only includes studies as they pertain to Gross Reservoir, not the other portions of the Project Area

\* Sampling was generally the FERC boundary, except where specific sampling sites are noted

\* Many resources used existing literature and publicly available GIS data for impact analysis