



June 25, 2020

Ms. Marcia Gilles, Acting District Ranger  
c/o Matt Klein, Realty Specialist  
White River National Forest  
PO Box 190  
Minturn, CO 81645

**RE: Whitney Creek Geotechnical Investigation**

Dear Ms. Gilles;

American Rivers submits this letter with comments and concerns about the proposed Whitney Creek geotechnical investigation for potential dam sites on Homestake Creek in Eagle County, Colorado. American Rivers is the largest river conservation organization in the country, with offices in Colorado and Washington, DC. We are a non-profit whose mission is to protect and preserve free flowing rivers and streams. While we are not opposed to all dams and reservoirs, we see them as a last resort.

We have been aware of the potential for future dam(s) on Homestake Creek since the Eagle River MOU was agreed to in 1998. We appreciate that you do not see this proposed geophysical investigation as part of any future dam and reservoir proposals.

We are concerned that the WRNF proposes to give this geophysical investigation a categorical exclusion rather than even a cursory NEPA review and analysis given the potential for serious and long-term impacts to Homestake Creek. A number of years ago the Ferdinand Hayden TU Chapter did restoration work with the WRNF on Red Dirt Creek. That project was delayed by two years for the NEPA analysis, and all we did was place some woody debris and plant a few hundred willows. This geophysical investigation will cause far more extensive and potential long-term impacts and deserves no less consideration than the Red Dirt Creek restoration project did.

The fact that the geophysical survey could impact designated Roadless Areas also seems to require greater scrutiny of potential impacts. We are concerned about the high decibel levels that will be produced and the impact on both wildlife and recreational activities. 110 db at half a mile is pretty loud. Ten blasts per day for as many as fourteen days is probably more noise than occurs during hunting season.

The proposed subsurface exploration has potential for the greatest impacts. Building access roads for the drill rigs in wetlands will, despite assurances of restoration, cause long term

damage to wetland vegetation and wildlife habitat. Drill rigs “up to 8 feet wide, 22 feet long and 8 feet high” are not small or light weight. Wetlands and other sensitive areas must be avoided.

Add this to the fact that the boring operations could take as much as five days per boring makes this a longer-term operation than one is led to believe. If each bore is done separately, that means the subsurface work could take as long as 50 days, nearly two months. This could cause serious impacts to wildlife at a critical time of year.

We are also concerned about the amount of water required for the subsurface investigation. The Technical Report bases its impacts on flows of Homestake Creek during normal years. 2020 is not a normal year and we expect that flows in Homestake Creek could be substantially below normal by late summer and early fall. Significant withdrawals of water from Homestake Creek could create seriously depleted or even dry sections of the creek below the drilling site.

Again, having this happen for as much as 50 days during times of critically low flows will have significant impacts on fish and other aquatic organisms that currently thrive in Homestake Creek.

Drill cuttings should not just be dumped, even in upland areas. Some other means of disposal should be explored.

Drilling activities will also create a fair amount of noise. This and the traffic situation on the Homestake Road (FS 703) need better consideration and analysis. This is a popular recreation area, especially on weekends. We have a difficult time with the statement that the geophysical and subsurface activities conducted over two months or longer “may have a slight impact on the quality of the visitor experience”. This is a rather biased and arrogant claim.

Mitigation, revegetation and erosion control need to be better explained and defined. What are the BMP’s that the contractor will be required to follow? What does “excessively wet” mean and how is that determined? Even a track mounted UTV drill rig can leave ruts and cause serious damage to even moderately wet soils. Potential soil compaction must also be considered, especially in wetland areas. Even wood mats will not eliminate compaction of soils and vegetation.

Wildlife and nest surveys are a must. Neither birds or wildlife follow our calendar, and the natural calendars have been shifting with climate change.

We think it imperative, not optional, that there be a joint site visit with USFS personnel prior to any activity, not just tree cutting. This site visit should also be open to concerned members of the public and representatives from organizations like American Rivers. Site visits and inspections by USFS personnel to ensure compliance with BMP’s and other stipulations, as well as revegetation and mitigations have been accomplished, should also occur during and after the proposed geophysical activities.

Thank you for your consideration of American River's concerns and comments. Should you have any questions regarding these comments please do not hesitate to contact Ken Neubecker  
Sincerely,

Ken Neubecker, Colorado Projects Director

Delivery to [matthew.klein@usda.gov](mailto:matthew.klein@usda.gov)