

June 28, 2020

Ms. Leanne Veldhuis,
Holy Cross District Ranger
White River National Forest SO
900 Grand Avenue
Glenwood Springs, CO 81601

Holy Cross District Office
PO Box 190
Minturn, CO 81645

RE: OPPOSITION TO PERMIT FOR EXPLORATORY GEOTECHNICAL DRILLING FOR
PROPOSED HOMESTAKE III (WHITNEY CREEK RESERVOIR PROJECT)

Dear Ms. Veldhuis,

Welcome to the Holy Cross District of the White River National Forest! As a dedicated employee of the United States Forest Service, you have been involved in protection of our country's natural resources for years. You've played an important role in evaluating all kinds of special projects on public land—land set aside for the public good. You understand the incredible responsibility of balancing competing uses. Your important role in reviewing proposals that would potentially damage irreplaceable functioning ecosystems is critical. You are the caretaker of this land on my behalf and I am here to back you up.

I am counting on you to protect the Homestake Creek ecosystem from the avoidable, unintended “downstream” consequences of drilling in environmentally fragile sites in the Homestake Creek watershed. We are all counting on you and the other dedicated scientists in the White River National Forest Service offices to protect the remarkable natural resources on National Forest lands all across the Eagle River watershed from destruction.

In your new role as District Ranger, you have the opportunity to make a difference in the protection of important natural resources in the headwaters of the Colorado River ecosystem. Please consider the big picture at stake with this one decision. You will find the back-story and history of the “Eagle River MOU” (ERMOU) vitally important to your homework on this individual permitting decision. Please take the time to study the history of the efforts to protect the Homestake valley and the Upper Eagle River watershed. This will help you balance development with environmental protection in these headwaters.

You value diverse stakeholder partnerships as much as I do. Brian Healy, (former Fisheries Biologist for the Holy Cross District) and I were awarded the *Collaborative Aquatic Resource Stewardship Award* in 2007 by the USFS Chief Gail Kimball. Our work to protect the Eagle River Watershed was recognized nationally because the outcomes engaged partnerships with multiple agencies, nonprofit groups and many hundreds of passionate community members. The people who made up those powerful partnerships have not gone away. We care deeply about the ramifications of this proposal to do exploratory drilling for another water storage project in the Homestake Creek watershed.

Please deny the drilling permit that would destroy wetlands and natural resources to create “temporary” roads for exploratory drilling rigs in the Homestake Valley. The ecological damages already sacrificed in the upper Homestake Creek watershed for the existing reservoir are substantial. The cumulative impacts of the proposed additional drilling sites are not worth the benefits. The loss of wetland connectivity and ecosystem services in order to explore feasibility of the potential water storage site called Whitney Creek Reservoir (aka Homestake III) are not warranted.

The proposed drilling test sites are only one of many related steps towards a water storage project (Whitney Reservoir) that will have widespread negative impacts well beyond the Holy Cross Wilderness Area and the Homestake Creek environment. Your permitting decision on the drilling sites should not be made independently of the permitting for the Whitney Creek Reservoir. The drilling would not be necessary if the reservoir will not be determined to be the Least Damaging Practicable Alternative. Why permit exploratory drilling related to a project that is very, very unlikely to be determined to be the Least Environmentally Damaging Practicable Alternative (LEDPA) to fulfill the Eagle River MOU objectives? Please include in your review ERMOU studies that explore alternative diversion sites lower in the watershed, below the Gore Creek confluence with Eagle River.

The Whitney Creek reservoir site is very unlikely to be determined to be the LEDPA for the Homestake Partners (Aurora and Colorado Springs) to develop an additional water source in the Eagle River watershed. Taking water off the peak of the hydrograph so high in the watershed exposes the fisheries resources below the Eagle River Mine Superfund Site (upstream of Minturn to Gore Creek confluence) to significant damage. The water quality in this mine impacted reach is measured by a *site-specific biological water quality criteria* negotiated with VIACOM/CBS (the responsible party) the community, USFS, CO Department of Natural Resources and the CO Department of Water Quality over many years.

Over \$80 million was spent by VIACOM to clean up the Eagle Mine Superfund Site in the 1990's. The recurring negative impact to the environment, and the annual cost to remove zinc and other heavy metals at the water treatment plant near Minturn will never go away. Protecting the fishery is a delicate balancing act that all the members of the community and most of the Eagle River MOU partners are committed to protect. It is important to take into consideration how the proposed Homestake III diversion would negatively impact water quality downstream. Early season lower elevation snowmelt results in flushes of metals into the stream. Critical spring flows from upstream dilute the high loads of heavy metals present in this reach of the Eagle River during late March, April and May. The impact to this reach of any further water diversions located ABOVE this segment of the Eagle River, such as a proposed Whitney Reservoir in the Homestake Creek watershed, must be accounted for as part of your review of the drilling permit. These are related actions and the cumulative impacts of the proposed drilling and other impacts of the entire reservoir proposal should be considered as part of your environmental evaluation of the drilling permit. Please explain how you are accounting for both the drilling area impacts AND the offsite impacts to water quality in this segment of the Eagle River as part of your decision-making process for the drilling proposal.

To ignore these additional negative impacts will damage the credibility of the Holy Cross District as well as the White River Supervisor's office with the local stakeholders who represent the wider public users of the national forest. Please keep me informed with the status of your review and any other opportunities to provide input to this permitting process that impacts the health of the Eagle River Watershed.

Sincerely,

Caroline Bradford
Concerned Citizen

[Executive director of Eagle River Watershed Council (2000-2007) and chairman of the Holy Cross Chapter, White River National Forest Association (1994-1996) during the last revision of the White River Land Use Management Plan]
