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June 30, 2020

Ms. Marcia Gilles, District Ranger
c/o Matt Klein, Realty Specialist for the Eagle-Holy Cross Ranger District
White River National Forest
24747 US Hwy 24
PO Box 190
Minturn, CO 81645

Re: Whitney Creek Geotechnical Investigations

Dear Ms. Gilles,

The mission of the Eagle Valley Land Trust (EVLT) is to protect forever the lands we love, to preserve our heritage, scenic beauty, recreational opportunities, and wildlife habitats, and to build a permanent legacy for future generations.

EVLT respectfully requests that you deny the issuance of the Special Use Permit (SUP) to the Homestake Partners and related Categorical Exclusion for geophysical surveys and subsurface studies in connection with their proposed Whitney Creek Geotechnical Investigation project. The proposed drilling, seismic testing, road building, heavy equipment and use of cross-country vehicles will result in significant and irreparable damage to a rare, vulnerable and threatened fen wetland ecosystem. EVLT is deeply concerned about this project's impact on the area and questions the feasibility of Homestake Partners' proposed mitigation by relocating impacted fen wetlands, an effort that has not been clearly established nor supported by science.

Although much of this proposed work may not occur directly in a specific wetland, it will occur adjacent to wetlands and will most certainly impact the wetland areas outside of the work area. Fen wetlands are among the most species rich habitats and are especially sensitive to small changes in the surrounding hydrology. In addition, the conservation of fen wetlands has been deemed a high priority in other regions of the west and elsewhere.

Even if this SUP is granted and, at the end of the geophysical and subsurface studies the area is then deemed unsuitable for a reservoir; this work will leave behind an irreparable scar in this sensitive ecosystem that has taken thousands of years to form.

Furthermore, EVLT opposes any boundary adjustment to a federally-protected Wilderness Area. This area was protected for its special qualities and is highly valued for wildlife habitat, sensitive wetland systems, and recreation. The removal of acreage from wilderness protection is a dangerous precedent to set and puts all other federally-protected wilderness areas in danger of land, water and mineral exploitation efforts.

The Homestake area has been a much-loved and valued recreational area for our community for many years. Evidence for this can be seen in the numerous comments submitted against this project by the community.

The Eagle Valley Land Trust stands in solidarity with all citizens and organizations who oppose the issuance of this SUP. We are also happy to work with the White River National Forest in any way we can to ensure that our protected lands remain protected for all.

Respectfully submitted,

A handwritten signature in blue ink that reads "Nancy Glass".

Nancy Glass
Stewardship Manager