

Ms. Marcia Gilles, District Ranger (Acting)
Ms. Leanne Veldhuis, Eagle-Holy Cross District Ranger
c/o Matthew Klein (matthew.klein@usda.gov)
United States Forest Service
P.O. Box 190
Minturn, Colorado 81645

Re: Plans for exploratory drilling in Homestake Valley in preparation for construction of proposed Whitney Reservoir within the Homestake Valley

Dear Ms. Gilles and Ms. Veldhuis:

June 28, 2020

My Comments: Reasons to Deny Drilling Permit in Homestake Valley

A GEOLOGIC FAULT LINE is underneath the Homestake Valley. Homestake I never should have been built in the first place. The line had been identified but might or might not have been known to those who issued the USFS permit. Another dam in the valley will worsen this situation and threaten downstream areas even more. This time there is abundant evidence with modern instruments, and it needs to be made known early. The proposed drilling will not change these facts in a significant manner.

1. **ROCK OUTCROPPINGS** in the vicinity of the dam site are unique and maybe even a world heritage site. They should not be disturbed. **HOMESTAKE VALLEY WETLANDS CANNOT AFFORD ANY MORE DEPLETION.** They have important characteristics including fens that cannot be replaced.

2. **HOMESTAKE CREEK VALLEY IS FULLY USED.**

Homestake Creek has already been restored near the streambed due to heavy camping use. The stream bed has crucial wetlands. The east side is wildlife habitat. The west side is wilderness. Historic mining and Homestake I are upstream. There are some homesteads, camping areas, and cabin leases in the middle. The Another dam would effectively remap parts of the area to include road relocation and wilderness boundary changes require an Act of Congress.

3. The **CAMP HALE STUDY** sponsored by the USFS and other respected groups did not consider possible water project impacts in the nearby Homestake Valley since it arbitrarily excluded the Homestake Valley which was part of the original Camp Hale reservation. Most importantly of all, additional modification of the quality of the Homestake wetlands which look like the original pre-Camp Hale wetlands should not be considered as compensation for other wetland destruction. The Camp Hale study issue has been raised with the USFS. The irony of the situation is that filling the Whitney Creek Dam will require removing more water from the current Camp Hale wetlands than the combined alternative noted in number 8 below.
4. The **FOREST PLAN** says permits that are inconsistent with the Forest Plan should not be issued. The USFS did not do sufficient research in the Forest Plan to consider the impact of possible water project expansion in the Homestake Valley. That is obvious when viewing the Forest Plan map. There are geological issues, heritage issues, wetland issues, recreation issues, water issues, wilderness issues, road issues, pipeline issues, wildlife issues, and tunnel issues. The proposed drilling would not solve any of these issues.

These issues should be reviewed by experts within the USFS and other governmental agencies as appropriate. We appreciate the ability to raise these issues. It would have been better to have considered these issues in the context of a plan for the Upper Eagle River Basin above its junction with Cross Creek given the provisions in the 1989 Memorandum of Understanding. The real question is why it takes so long to raise the important issues involved.

5. **Forest Service DENIAL OF THE DRILLING PERMIT WOULD ENCOURAGE GREATER ATTENTION TO A WIDER RANGE OF ISSUES IN THE USFS PLANNING PROCESS.** Too often this process just absorbs participation but does not resolve the real issues involved. It is time to get to the real issues.
6. There are several issues related to the needs of **EAGLE COUNTY WATER QUALITY** that relate to the actions of the USFS. These seasonal flow issues support the entities involved getting together on a single project which is possible. See my Vail Daily Valley Voices August 8, 2019. It is possible to phase this in with first phase taking care of the needs of Colorado Springs and Aurora. This logical outcome is the most likely final resolution of the issue. The Forest Service should insist on studying it now rather than allow drilling in the Homestake Valley.
7. **A COMBINED PROJECT THAT MEETS THE GOALS OF THE ENTITIES INVOLVED IS FEASIBLE.** The outlines are logical and have been known for some time. The biggest obstacle has been that it requires several entities to work together with no one entity getting all that it might desire. To get to this point is going to require leadership. This just might be the time since forces are coming in from all sides. See my Vail Daily Valley Voices August 8, 2019. This alternative

allows for about 5,000 additional acre feet of water to flow through the Homestake Creek wetlands, the Camp Hale Wetlands, and the long Fall Creek waterfall (about 15,000 total) than would building Whitney Creek Reservoir.

8. WHY ALL THE CONCERN ABOUT THIS DRILLING?

Seemingly little steps can lead to big results. The Fault lines under the Homestake Reservoir were missed. The attention required by tourism and the growth in down valley population in Eagle County can give an outsized influence to any single decision regarding the less studied areas of the county. It is just not the time to start down an expensive path in the Homestake Valley where one decision justifies the next one.

Dr. Jack Holmes

Professor Emeritus of Political Science
Hope College

Previous Comments to Supervisor Fitzwilliams

March 4, 2020

Mr. Scott Fitzwilliams
Supervisor, White River National Forest

Dear Supervisor Fitzwilliams,

These comments elaborate on the comments made by Dr. Warren Hern, Chair of the Holy Cross Wilderness Defense Fund, dated January 30, 2020

referencing a drilling application by the Cities of Colorado Springs and Aurora. My comments elaborate on alternatives that are available to the Cities. I also viewed a public hearing in Eagle County in February, 2020 about the Memorandum of Understanding Process.

One can hardly disagree with the degree of change that has taken place since the time the Cities of Colorado Springs and Aurora acquired water rights in the Eagle River basin. Where does this leave us in 2020? I have been an active part of this for the last sixty years. In my opinion, it is a matter of working together for the good of the people. The Homestake II process led and the Memorandum of Understanding process. That process is ongoing, but needs to consider a wider range of alternatives than currently is the case. In particular, it needs to recognize that activities can be limited to areas already impacted by development. There is no need to stray from the Upper Eagle River and its East Fork Tributary and the well-established rail/transportation corridors and well-developed mining properties which can be modified. The idea of doing more wetland damage in the Hometake Valley and compensating by restoring part of the Camp Hale wetlands makes no sense, especially since both were part of the original WWII reservation. It is a waste of money to plan wilderness boundary changes and more water projects in the Homestake valley.

My Article in Vail Daily in August, 2019 also is relevant to alternatives and is taken from their website below.

Holmes: One solution to numerous water projects

[News](#) | August 8, 2019

Jack Holmes
Valley Voices

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There are at least five water-related project proposals being considered for the Upper Eagle River Valley from Dowd Junction to the top of Tennessee Pass in the next 50 years. These include several tributaries of the Eagle River.

One combined project could take care of all major stakeholders and turn the area into a model for the future. The alternative will be five decades of litigation and a patchwork of projects that will be costly to all communities.

It is not about who will get the water. That is settled by Colorado Water Law and the 1989 Memorandum of Understanding. It is about whether the parties involved will work together, which happened during the drought of the early 2000s, or go in separate directions, which was the case during the middle 1950s.

The common project would be an Upper Eagle Pipeline and Storage Co. from Dowd Junction to Tennessee Pass. Storage, if needed, could be at Bolts Lake and Camp Hale. The 20-mile-long pipeline would follow the route of the Eagle River, the Railroad, the U.S. 24 highway or some combination thereof depending on what works and preserves the existing scenic corridor between Dowd Junction and Tennessee Pass.

That is the lowest continental divide pass in the Central Rockies. Those wanting to move or store water would need to pay accordingly. A trench and bury pipeline approach would seem to a good approach.

This proposal would give all major parties what they need at a reasonable cost. Memorandum of Understanding obligations could be met. To be sure, this would require some compromise. Camp Hale restoration might need to shift from some limited and expensive wetland restorations to a series of small reservoirs but probably would get more visitors to honor the 10th Mountain Division. Extensive wetlands are a few miles away on Homestake Creek in the original Camp Hale boundaries.

Building the one project pipeline and reservoirs would require funding, but it should cost less than tunnels, which are problematic to begin with because of potential seismic activity that would destroy the tunnels. In fact, the concept could be sold as a demonstration project worthy of grant funding.

While moving of water is not attractive to environmentalists, the concentration of project impacts in a well-established corridor makes sense. To be sure, the rail corridor would need to be preserved for possible future use, but an adjoining pipeline could be helpful in this regard.

If Front Range communities are more willing to pay for initial construction than Western Slope entities, the first phase of the project could start at the junction of Fall Creek and the Eagle River.

A major environmental question is how much effort should be spent to erase existing environmental impacts in the Eagle River and its Homestake Creek tributary basins above their lower Red Cliff junction. Such actions could merely shift impacts to the other basin at great public and environmental expense.

Anybody familiar with these issues knows that this proposal is a simplified summary. However, it also is known that 50 years in court and countless engineering and field hours can be curtailed by working together. The public has every right to insist that every attempt be made to arrive at a unified approach. While there are some good studies of limited areas, consideration of the larger area is missing at this point.

Jack Holmes is Professor Emeritus of Political Science at Hope College in Holland, Mich., and vice-chair of the Holy Cross Wilderness Defense Fund. He has backpacked in the Holy Cross Wilderness since 1959 and is a summer resident on Homestake Creek above Red Cliff. For many years, he taught a summer course on wilderness politics.

Thank you for considering this input.

Jack E. Holmes

Vice-Chair, Holy Cross Wilderness Defense Fund. Copy to Dr. Warren Hern, Chair, Holy Cross Wilderness Defense Fund.