



July 27, 2020

Ms. Marcia Gilles
Acting District Ranger
c/o Matt Klein, Realty Specialist
White River National Forest
PO Box 190
Minturn, CO 81645
Submitted via email to matthewklein@fs.fed.us

RE: Scoping Comments on Homestake Partners' Proposed Whitney Creek Geotechnical Investigation

Dear Ms. Gilles and White River National Forest,

Thank you for the opportunity to provide comments on the Whitney Creek Geotechnical Investigation proposed by Homestake Partners and currently under consideration for a special use permit from the Forest Service.

The Colorado Mountain Club was founded in 1912 to promote outdoor recreation, education and conservation in the Rocky Mountains. The club's 7,000+ members are hikers, climbers, mountaineers and backcountry skiers, as well as nature enthusiasts, Wilderness advocates, and public land stewards. The Club has a legacy of Conservation work in Colorado including engagement in the 1980 Colorado Wilderness Act which designated the Holy Cross Wilderness.

The Homestake Partners plan a subsurface exploration and a seismic survey which would involve drilling ten holes, each 150 feet deep. The drill pad for each hole would require a cleared area spanning 40 feet x 20 feet – 800 square feet total. Each site would be accessed by a ten foot wide road. Using these roads, the Partners would transport to each site a drill rig – which is 8 feet wide, 22 feet long, and 8 feet high – along with a “small utility vehicle,” pulling a trailer, and a skid steer. The seismic survey involves use of geophones to analyze seismic conditions beneath two potential dam alignments for a planned Whitney Reservoir; the geophones emit repeated sound bursts at 170 decibels, as loud as a shotgun blast.

The Colorado Mountain Club is highly concerned about the proposed project at Whitney Creek because of the impacts to outdoor recreation and natural resources in the area, as well as impacts to the adjacent Holy Cross Wilderness. The Whitney Lake trail #2002 begins at the Homestake Road and provides access to Whitney Lake within the Holy Cross Wilderness. The trail is popular for hiking, backpacking, horseback riding and fishing. Hornsilver Campground and Gold Park Campground are popular destinations for both motorized and non-motorized users while the Homestake Road is a popular winter destination for crosscountry skiers, snowshoers and snowmobilers. The lower reaches of Homestake Creek also offer world class kayaking

during spring runoff. The proposed project would significantly impact the experience of recreation users in the valley and disrupt the quiet, natural setting that forest visitors enjoy. The forest must assess the impacts to users including: noise, increase road traffic, visual impacts, and public safety including potential avalanche triggering from seismic surveys. Impacts to Wilderness character must also be analyzed.

A full Environmental Assessment must be conducted in order to adequately analyze the impacts of this project on both users and natural resources. Extraordinary circumstances exist that prohibit use of a categorical exclusion because the proposed action may or will have significant impacts to wetlands, potential fens, Wilderness and Roadless areas. Additionally, the Forest Service did not specify an applicable categorical exclusion in its scoping letter and an EA would allow for analysis of alternatives – such as the number of boring sites – as well as analysis of cumulative impacts.

Thanks very much for your consideration of our comments and we'll look forward to a robust analysis and continued engagement on this project moving forward. Sincerely,

A handwritten signature in blue ink, appearing to read 'Julie Mach', is positioned above the typed name.

Julie Mach
Conservation Director
Colorado Mountain Club
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303-996-2764