



June 15,2020

Mr. Scott Fitzwilliams
Forest Supervisor
White River National Forest
900 Grand Ave.
Glenwood Springs, CO 81601

Dear Mr. Fitzwilliams,

Subject: Whitney Creek Geotechnical Investigation project.

On behalf of Colorado Headwaters, I respectfully request that you deny the Special Use Permit for the Whitney Creek Geotechnical Investigation project. This SUP is clearly premature in the fact that a number of critical issues have not been considered or discussed prior to this request. Allowing the core drilling permit before a full discussion and analysis of the items listed below can't be allowed or defended.

Geological Faults:

Of major concern is the fact omitted by the Forest Service in any documents that the area in question, Homestake Creek, lies in a major fault zone. The entire region of the Rocky Mountains consists of extremely fractured geology and the location of the proposed action is a prime example. Today, there are over 400 dams at High Risk at this time in Colorado. The major weakness of the application is a result of the Forest Service not disclosing the information of the geological dangers of potential earthquakes in the Homestake drainage.

Transmountain Diversion:

Transmountain Diversions are a relic of the past in water planning and have not been built or planned for over forty years, since the demise of Two Folks in the 1980's. Front Range cities have developed conservation measures that have been extremely successful in allowing additional growth without destroying critical high elevation ecosystems. The cumulative negative impacts of sending critical waters to the Front Range must be addressed prior to any developments. As the nation moves forward in the decommission of dams across the country, it is highly questionable why this old technology is being considered.

Holy Cross Wilderness:

The proponents have stated that some 500 acres of the Holy Cross wilderness would be required to facilitate the proposed dam, roads and construction of the proposed project. This contentious action will result in a very long and drawn out fight.

Wetlands and Fens:

Your office has stated that the Homestake Creek wetlands and fens are of extremely rare and of high value . The fens in the drainage are critical and are not able to be mitigated in any manner. This is supported by scientist, water engineers, conservation groups and others nationwide. The proponents have not given any data illustrating how they will address these irreplaceable fens

Climate Change:

Climate Change has had a profound negative effect on the Colorado River system, the West, the Nation and the World. The results are a serious decline in moisture over the past 25 years. This has resulted in a 19% decline in flows in the Colorado River system. The proponents obtained the water right to the Homestake drainage in 1952. There is no question that this water right has also been reduced a substantial amount during the past 25 years and as a result of Climate Change.

Economic Values:

Over the past 25 years, the economic value throughout the West Slope has grown substantially. Colorado is the number one life style state in the nation and a great deal of these values and resources can be found west of the Continental Divide. Outdoor recreation is a \$62 billion dollar industry in the State and primarily a result of the public lands in the West Slope. This important resource is directly related to the ranching and farming communities, small town environments, wildlife and fishery resources on the West Slope.

Respectfully,


Jerry Mallett
President