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Organization:

Title:

Comments: *I strongly oppose the requested special use permit (SUP) and related Categorical Exclusion (CE) for geotechnical investigations in connection with Homestake Partners' proposed transmountain diversion of water from Homestake Creek in the Holy Cross Wilderness for the Whitney Reservoir project.

*The requested SUP/CE would allow for up to a year of drilling, road construction, and cross-country travel by vehicles and equipment within the White River National Forest in support of the proposed reservoir and diversion project. All of this will be detrimental to the habitat and potentially push into the wilderness area

*I oppose both the SUP/CE and the underlying proposed Whitney Reservoir project. The proposed reservoir site would flood portions of the U.S. Forest Service's Homestake Road about five miles above U.S. 24 between Red Cliff and Leadville, and according to the proponents would require "just a little bit of adjustment ... a very minor adjustment" of the wilderness boundary along the road.

*Diverting even more water out of the headwaters of the Colorado River is a terrible idea. Drought conditions continue in this state. Additional reservoirs, especially high mountain reservoirs to be used for front range cities water collection and storage further depletes runoff and ground water tables for the area where they are developed and instead creates a reservoir that evaporates much of its surface area.

*The proposed work also is a critical step in advancing the Whitney Reservoir project, which would require making a Wilderness boundary "adjustment" to reduce the Holy Cross Wilderness by almost 500 acres. I oppose reduction of any federal Wilderness Areas, and especially the unique Holy Cross Wilderness which is already being dewatered by the Homestake Partners. Nor should the communities of Aurora and Colorado Springs propose a change in the wilderness boundary to accommodate their project.

*I am deeply concerned about the Whitney Reservoir project's impact on the environment and the complex fen wetlands. These wetlands are some of the states most biodiverse and fragile environments of their type. Their presence on the White River National Forest, in the already designated Holy Cross Wilderness area should further protect them from the proposed project. To protect fens, the U.S. Fish and Wildlife Service and the Environmental Protection Agency have the "fen policy" amended in 1999, which determined that fens are irreplaceable resources because their soils take so long to regenerate. As a "Resource Category 1," it is appropriate to avoid and cause no loss. "On-site or in-kind replacement of peatlands is not possible", the policy reads, thereby reclamation and restoration of complex fen wetlands has not been proven to be possible. Therefore offsetting and mitigating for the loss of this area is not realistic or plausible.

*The communities of Aurora and Colorado Springs should take action to reduce their water needs, and promote water conservation within their own communities and not destroy our Wilderness and rivers.

*Many years ago Aurora and Colorado Springs attempted to bully this project forward, and it eventually died in 1994. While the two cities have now been working with their Eagle River partners on the Eagle River Community Water Plan, due to a 1998 MOU, the basinwide planning process does not break out the impact of individual projects, and it prevents the partners from opposing each other's projects which is counterproductive to the local community and their stake in the preservation of the environment, plant life and wildlife in this wilderness area. Therefore the USFS through its NEPA process must oppose the requested special use permit (SUP) and related Categorical Exclusion (CE) for geotechnical investigations in connection with Homestake Partners' proposed transmountain diversion of water from Homestake Creek in the Holy Cross Wilderness for the Whitney Reservoir project with a no action preferred alternative.