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First name: John

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Organization:

Title:

Comments: Leanne Veldhuis, Eagle-Holy Cross District Ranger

PO 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 watershed (Whitney Creek Geotechnical Investigations #58221)

Dear Ms. Veldhuis:

I call upon the Forest Service to deny any and all permits for exploratory drilling or any auxiliary construction activity or roads in the ultra-sensitive and priceless area of Whitney Creek and the Homestake Valley. Any exploratory drilling or construction activity, either in or immediately adjacent to the Holy Cross Wilderness in order to advance the proposal to create a dam and to allow more taking of water out of that valley for a transmountain diversion must be prohibited in total. It would be a perfect storm of travesties in economic costs, political havoc and damage too great ever to repair to both the immediate area's natural resources and to all downstream water sources along the whole of the already-overused Colorado River Basin.

Such a permit for drilling serves no purpose, as the reservoir is extremely unlikely ever to be built, as I note below. The proposal for a dam on Whitney Creek represents only destruction, both now in its devastating construction effects on invaluable wilderness resources, and also in the future because of a dam's inevitable, catastrophic failure due to documented geologic faults.

In brief, this proposed dam would stand precariously astride both physically active seismic crack zones-already known without need of drilling-and metaphorical earthquakes of public upheaval about shrinking water supplies all the way down the entire Colorado River drainage throughout the West. You must not bring this calamity down upon us.

First, there is no provable need, beyond what water they currently waste, for the cities of Aurora and Colorado Springs to store more reservoir water here. Nor do they have the provable ability to pay for it. Their attempt to issue bonds in these extremely uncertain times of record low tax revenues would likely not qualify with any legitimate underwriter. Undertaking more debt for this project will have to reveal to the skeptical public their high risk of default, the predictable liability of being hamstrung by unfinished construction and liens from jilted contractors, years of lawsuits, unaffordably escalating costs, and only a further ruined ecosystem to show for it.

Aurora and Colorado Springs must not only present their claim of right to develop the water, which in itself is now subject to challenges, but they must also prove their financial wherewithal to sustain that development and its ongoing maintenance. Before granting a permit for any exploratory intrusions, you must demand bona fide sources of viable funding sufficient to complete the project and open those sources to public scrutiny. Due diligence is already absent here.

The Memorandum of Understanding cites a hugely imprecise variance in proposed sizes for the dam. As quoted by ERO Resources Corporation and RJH Consultants, Inc., the companies that prepared the technical report: "The cities are currently considering and evaluating multiple reservoir sizes with potential storage capacities between 6,850 and 20,000 acre-feet."

Contrary to any "understanding," this means neither the agency nor the public can have any confidence that the

cities have secured specific funding for these nebulous goals. They can't even tell you how much they're going for or estimate how much damage they will create in doing so. Throwing onto the table the corresponding imprecision of cost estimates from two entirely different urban constituencies, possible allocation disagreements, no verifiable specifics, no public disclosure of their funding, no impact statement, and calling for such a widely-ranging spectrum of proposed needs, these cities then ask you to turn the Holy Cross Wilderness into a casino. The Forest Service must not play at dice with speculators.

Granting exploration for a project that lacks definite specifications and therefore has little or no chance of happening, is, of course, superfluous at best and would be comical if not so threatening of irreversible damage. It is also unprofessional of the Forest Service and possibly negligent malpractice. With the agency's own liability at stake, it would be especially prudent for the Forest Service not to allow exploratory damage to this resource merely on evident speculation.

At present, the highest and best use of that water is in its storage, replenishment of outflow and critical essence of enduring wilderness. It is especially crucial to maintain intact our cooling, high-country headwaters and their associated cooling environs in this era of global warming. With widespread western droughts, these resources have no substitute. There are no higher watersheds to tap. There is only our peril in destroying them.

These cities have the preferred and superior alternative of conservation. Conservation has already fast arisen as the far more cost-effective path forward for them. Plus, conservation avoids the massively destructive consequences of letting short-sighted profiteers try to cash out the rarest values of the Holy Cross Wilderness. Aurora and Colorado Springs must deal with and balance their growth through conservation, smarter planning and 21st Century rethinking of their priorities.

It is not up to the rest of Americans who own and cherish this wilderness to sacrifice forever their true sense of lasting value to the obsolete habits of dam builders. There's a better way, and we expect our U.S. Forest Service to stand up for that better way in this new century.

The present Homestake Reservoir serves as a prime case in point with its current maintenance cost overruns and its ongoing damage to the area. We must learn from that horrendous mistake and must not acquiesce to misguided calls for yet another even worse one.

In fact, the most responsible action for the Forest Service to take would be to promote the values gained from removing the current Homestake Reservoir and of undertaking as much as possible the restoration of the wilderness with its natural production and underground storage of clean water. That dam's worthiness in terms of both its economic and intrinsic losses is already highly doubtful, and either taxpayers, downstream compacts or nature will end it before long anyway. The very idea of yet another dam in the mold of that mistake stands only in stark evidence of repeating that folly.

Next, please know that you will not be able to dismiss the issue of severe damage to the rare form of wetlands known as fens and their endangered flora and fauna habitats in the Homestake Valley. This issue alone is enough to deny this permit from the start and will certainly derail it in the end, either through costly delays in the courts or by outright prohibition through demands for enforcement of the Endangered Species Act from an increasingly knowledgeable and alarmed public.

The endangered ecosystems of the fens cannot be ignored, exchanged, offset, substituted or swapped out in any way with any other wetlands elsewhere. These fens are unique. The Forest Service itself has acknowledged their rarity and has scientifically noted the necessity of maintaining the delicate pH chemistry of these exceptional habitats built up over 10,000 years. These fens are irreplaceable. Experiments to relocate them cannot take 10,000 years or more worth of wilderness with them. They cannot recreate the Pleistocene. I call upon you to do your duty to issue immediate protection for them and to solidify protection of the correlative Holy Cross

Wilderness boundaries under all circumstances.

Damage to the fens and to the wilderness is of immediate consequence. The Forest Service must join with the rights of all Americans to stop any intrusive damage to these priceless public treasures.

I speak first here individually. But in even larger furtherance of this urgent call for action, I also join in full support of the comments, evidence, references, documentation, and thorough advisements offered to you on June 28, 2020, by Dr. Warren Hern of the Holy Cross Wilderness Defense Fund. I heartily commend his public comment to you in its entirety, for its high value, its sincerity, its knowledgeable passion and its accuracy. We are so fortunate to have Dr. Hern's expertise freely given to all of us in both our local and national interests in order to facilitate your most responsible process in this crucial decision.

I have deeply reviewed and continue to study Dr. Hern's material in evidence. It is profound. As a journalist, I am used to surveying the fields of literature, science, testimony, on-the-ground experiences, primary sources and analyses of many issues for verification. I find Dr. Hern's pro bono offerings to you, through his precise research and his longtime in-depth experience with Holy Cross Wilderness, to be irrefutable, dispositive and conclusive in support of your highest level of protection for this area and for denying any and all permits for exploratory drilling or construction of any infrastructure, either temporary or permanent, in or adjacent to the fens and the wider wilderness.

In my lifelong journeys into wilderness experience, advocacy, and factual journalism, I have seen many needless losses to our environment, to our heritage, to our connections to life and thus losses to the very core of our physical and spiritual sustenance. Always there has been a decision maker at the crux. Most have failed their moment in history. You now stand in that crux. Do not pass it off. Decide. Decide now for the life of the natural world that sustains us all in its primacy, in its origins, in its true reservoirs of clean and renewing waters of life that are the wilderness of mysteries from which we all come.

Sincerely,
John Roberts

Please include my statement in the permanent record on this matter