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Comments: Subject: Whitney Creek Geotechnical Investigation #58221

Forest Service,

Before any federal funds and other resources are committed to this proposed action, I believe it would be beneficial for the USFS to meet with the US EPA and US Fish and Wildlife Service to discuss the likelihood that these agencies may not approve a new reservoir. Considering that water in the Colorado River Basin is already heavily over-committed, it is no surprise that continued high temperatures and lack of rain are just exacerbating the effect on reservoirs downstream, notably Lake Powell and Lake Mead. These reservoirs have remained well below capacity, for several years.

The over-utilization of this water resource is putting at least 4 species of native fish, including the Razorback Sucker, Bonytail, Humpback Chub, and Colorado Pikeminnow in peril. The first two species aren't known to be reproducing and; therefore, are effectively extinct in the wild. The FWS had previously determined that additional depletions of even 1 acre-foot could lead to the local extinction of one or more of these species. A new reservoir of the size being proposed by Homestake Partners would likely cause additional depletions through evaporation and seepage and by diverting more water from the Colorado River system for non-essential uses. As a result, the FWS (provided there is no political interference) is likely to issue a jeopardy opinion that would preclude USFS issuance of a permit. There are no practicable or sensible alternatives that could mitigate for the additional depletions associated with this project.

Similarly, the EPA may deny a 404 permit under the Clean Water Act for similar reasons (provided there is no political interference). With the proposed Two Forks Dam, the EPA denied a 404 permit because the proposed dam posed "unacceptable adverse effects on fishery areas and recreational areas." Although the present proposal involves less water storage, the Colorado River is in far better shape ecologically than the South Platte River tributaries at issue in the Two Forks proposal. Further, there was no jeopardy situation at issue in Two Forks, as there is here.

At the bare minimum, the USFS should discuss these concerns with the FWS and EPA before proceeding, to determine whether this proposal is likely to be put on hold. Granting geophysical surveys to search for a site to construct a dam and reservoir that won't be built would waste valuable resources and cause unnecessary environmental impacts from the survey activities themselves.

With regard to the proposed geophysical survey and subsurface exploratory study at issue in the CE, the scoping notice states that none of these activities would occur within designated Wilderness areas, but some could occur with designated Roadless Areas. If there are roadless lands that might be affected, including lands that were removed from Roadless inventory maps in the wake of the Colorado Roadless Rule, that still meet the criteria for Roadless inventory or future Wilderness designation, a categorical exclusion is not applicable. Given the significant public controversy over these lands, the USFS should prepare an EA to fully disclose the nature of activities in roadless areas, evaluate and publicly disclose the potential impacts, and identify alternatives that would avoid these impacts. Of course, any project that accomplishes the stated objectives will have impacts that are so undeniably significant that the USFS should initiate a full-blown EIS now since impacts from water depletions will be similar regardless of location.

This proposed work may be critical to advancing the Whitney Reservoir Project, but it will require making a Wilderness boundary "adjustment" to reduce the Holy Cross Wilderness by almost 500 acres! Americans don't write and call their Congresspeople to designate wilderness areas, just so some developer can come along and take that land away from the public for their own private dam or ski resort. These wilderness areas belong to the American people for our use and enjoyment! Clearly, I don't support reductions in our public Wilderness Areas. Further, the requested SUP/CE would permit 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. These activities would cause significant damage to an ecologically unique and sensitive area that provides essential habitat for wildlife and would damage areas popular with many outdoor enthusiasts.

Additionally, I am concerned by the Whitney Reservoir project's impact on the environment and complex fen wetlands. These wetlands are some of the finest of their type in the entire White River National Forest. These areas are essential for carbon sequestration and other important ecological functions. Unfortunately, reclamation and restoration of complex fen wetlands is still not possible.

The communities of Aurora and Colorado Springs should take actions to reduce their water needs through conservation and better planning, just like other communities have to do. Why should Americans have to give up their beloved Wilderness, their wildlife, or their recreational opportunities, for the sake of unlimited and unsustainable urban growth. Thank you for considering my comments.

#### References

Green, Susan. "Ex-EPA Chief proud he killed Two Forks." The Denver Post. October 28, 2000. Denver, Colorado. <https://extras.denverpost.com/news/news1028d.htm>