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First name: Dylan

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Organization:

Title:

Comments: Marcia Gilles, Acting District Ranger

White River National Forest

PO Box 190, Minturn, CO 81645

Dear Acting District Ranger Gilles,

Thank you for your careful and committed management of public lands. My constituents are deeply concerned about the Whitney Creek Geotechnical Investigation now being considered by the White River National Forest. The proposed subsurface exploration and seismic survey would significantly impact precious wetlands and intrude into a roadless area. They would also support a dam project which would irreversibly damage the Holy Cross Wilderness, Homestake Valley, and the Eagle River watershed. I am writing to request that the F.S. conduct an Environmental Assessment for the Whitney Creek Geotechnical Investigation project.

The project involves several "extraordinary circumstances" which means that the Forest Service cannot categorically exclude it from further analysis under the National Environmental Policy Act. Drilling would take place in fragile alpine wetlands along Homestake Creek and in or near potential fens, ancient and irreplaceable wetlands. For months this summer, parts of the Holy Cross Wilderness would be inundated with sound from drilling and from the seismic survey, and roads would be cut to the wilderness boundary. The seismic survey would extend into a designated Colorado roadless area. I hope the Forest Service will do as much as possible to protect wetlands, wilderness, and roadless areas from this project.

I am are concerned that this project will have unnecessary impacts and that it relies on partial information. To complete the investigation in time, the Partners might cut trees to clear roads during avian breeding season. Their own soil analysis and maps from the Colorado Wetland Inventory indicate that there are fens in the project area. They have not adequately considered alternatives suggested by the Forest Service which would mitigate impacts, for example, by eliminating the need to cross Homestake Creek. There is no plan to close roads during drilling so that users of Homestake Road do not follow these new roads to the wilderness boundary. I ask the Forest Service to engage in a public-facing process to update their maps of fens and to require the Partners to more fully plan to avoid impacts to Homestake Valley.

The geotechnical investigation is justified by the larger aim to build a reservoir in Homestake Valley. I oppose this larger project, which would drain or drown acres of wetland and potential fen, would remove as many as 497 acres from the Holy Cross Wilderness, would deplete the Eagle River watershed, and would impair lynx and elk winter habitat. The Whitney Creek geotechnical investigation should not be considered in isolation from Whitney Reservoir. My constituents have voiced concerns about the drilling and the dam. They do not see these as separate projects.

Along with many of my constituents, I strongly urge you not to categorically exclude this project from NEPA analysis. Thank you for your consideration.

Sincerely,

Dylan Roberts

State Representative, HD 26 (Eagle County & Routt County)

Resident of Avon, Colorado.