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Comments: The cities of Aurora and Colorado Springs are seeking a special use permit from the U.S. Forest Service to drill 10 exploratory bore holes in the Homestake Valley to determine the feasibility of building a dam and reservoir - the Whitney Creek Geotechnical Investigation. The study is a preliminary step towards the destruction of critical wetlands, multiple endangered or threatened species, public land access, and the removal of nearly 500 acres from the Holy Cross Wilderness.

Each of the proposed drill sites and/or access routes to them fall within approximately 70 yards of either the Homestake Creek, the Holy Cross Wilderness Boundary, a Colorado Roadless Area, or a USFS designated dispersed camping area. Heavy machinery will clear 20' x 40' drilling sites in addition to access routes. One access route is planned directly through the Homestake creek.

The USFS has publicly stated that "analysis is likely to be a Categorical Exclusion" - meaning the study will not be required to provide environmental impact assessments federally mandated by the National Environmental Policy Act (NEPA).

The decision to consider this special use permit as a categorical exclusion from the environmental assessments required by National Environmental Policy Act (NEPA) is a blatant contradiction of the USFS own published guidance. The proposed drill sites and access routes are located within 200 feet of areas that would meet at least 4 of the 7 criteria suggested for consideration when determining whether further environmental analysis is warranted. We should be able to rely on the USFS to continue the tradition of protecting our most precious lands by employing the full scope of management tools afforded to them by law.

Considering the potential negative impacts of the geotechnical investigation, in addition to the overwhelming public disapproval of the larger project, Homestake Partners (the cities of Aurora and Colorado Springs) should be held to the highest standard of regulatory scrutiny. USFS should not approve the special use permit, and it certainly should not exempt it from NEPA analysis via categorical exclusion.

Evaluating the environmental impact of actions by agencies has been a legal requirement since 1970 when the National Environmental Policy Act (NEPA) was enacted. In 1980, The United States Congress took the initiative to afford the nation's highest degree of protective status to the Holy Cross Wilderness. In 2020 the Great American Outdoors Act -the most significant conservation legislation in a generation - was signed into law with overwhelming bipartisan approval. In 2021 the Senate is being called on to pass the CORE Act which would enhance and expand protections for public land across 400,000 acres in Colorado, including the Holy Cross. There is a clear public mandate to protect this land from precisely the type of exploitation and damage inherent in the proposed fatal-flaw investigation.

In the same drought choked summer Homestake Partners requests permission to drill for a future of increased consumption, they have failed to make any demands of their own constituents to reduce demand.

Unironically, one of the images prominently displayed on the City of Aurora's homepage [auroragov.org](http://auroragov.org) depicts a lush green golf course separated from the snow capped peaks of the Rockies by a crisp dry expanse of native grasses. Aurora's own proposed rate structure changes for the following year are self-described as having "little to no impact on approximately 80% of customers".

Colorado Springs Utilities indicates 35% of average residential water use is dedicated to landscaping. Although water-wise rules restricting outdoor watering to 3 days a week were implemented on May 1st 2020, enforcement

of those rules won't begin until 2021, and no additional restrictions have been implemented in light of the drought encompassing 100% of the state.

Protecting Colorado's high country from the ever-increasing demand on its land, water, and wildlife is a responsibility that requires sacrifice, restraint, and foresight by all of its stakeholders. The dedicated professionals of USFS commit their careers to the effective management of our public lands to "meet the needs of present and future generations". Neither present, nor future generations of Coloradans stand to benefit from the decision to make damaging this fragile wetland easier, cheaper, and faster.

Please do not approve this special use permit, and do not consider it a categorical exclusion.