

February 10, 2021

Robert Bonnie  
Deputy Chief of Staff for Policy  
Chris French  
Acting Deputy Under Secretary, Natural Resources and Environment  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, D.C. 20250  
*Submitted via email to:* [Robert.Bonnie@usda.gov](mailto:Robert.Bonnie@usda.gov), [chris.french@usda.gov](mailto:chris.french@usda.gov), [cfrench@fs.fed.us](mailto:cfrench@fs.fed.us)

**Re: Request for White River National Forest to Review Whitney Creek Geotechnical Investigation for Conflicts with New Administration Policy**

Dear Deputy Chief of Staff Bonnie and Acting Deputy Under Secretary French:

We write to request that the White River National Forest place an indefinite hold on any decision regarding the Whitney Creek Geotechnical Investigation project proposal for a special use permit (SUP) to allow time to review questions of fact, law, and policy in light of the new administration's priorities and policies relevant to the responsible stewardship of the National Forest System's lands, waters, and resources for current and future generations. Taking time for thorough and thoughtful review would be consistent with the approach set forth in the U.S. Department of Agriculture's Acting Under Secretary's February 1, 2021 memorandum with instructions for the Department to review certain pending decisions (attached hereto), and Executive Order No. 14008, 86 Fed. Reg. 7,619 (Feb. 1, 2021), Tackling the Climate Crisis at Home and Abroad.

We seek this additional level of review of the Whitney Creek project because the project would: (1) permit drilling that could dewater and destroy irreplaceable wetlands; and (2) pave the way for a reservoir that will require road construction in an inventoried roadless area (IRA), and will flood hundreds of acres of designated wilderness. Despite the potentially significant damage the project could cause, the prior administration reviewed this project via a categorical exclusion. As such, this project reflects the priorities of the prior administration in which the project was developed, namely, an emphasis on streamlining project development, on circumventing National Environmental Policy Act (NEPA) public involvement opportunities, and on ignoring protection of IRAs.

These prior administration priorities, and this project in particular, are at odds with the new administration's agenda, including the goal of conserving 30 percent of federal public lands and waters by 2030. Exec. Or. 14008, 86 Fed. Reg. at 7,627.

The undersigned organizations represent thousands of members and supporters who care deeply about the future of the White River National Forest, the Holy Cross Wilderness Area, and its irreplaceable wetland ecosystems, and who have been actively engaged in ongoing public process regarding the Whitney Creek proposed SUP. More than 500 public comments opposing the reservoir and investigation were filed during the scoping period in the summer of 2020 including from the mayors of the towns of Redcliff and Minturn. *See* July 9, 2020 Vail Daily

article, Forest Service flooded with comments opposing Whitney Creek Reservoir, drilling, available at <https://www.vaildaily.com/news/forest-service-flooded-with-comments-opposing-whitney-reservoir-drilling/> (last accessed Feb. 5, 2021).

While this project does not neatly fit one of the categories identified in Acting Under Secretary French's memo, the potential for significant impacts to critical wetland resources, as well as the potential for future damage to roadless and a wilderness area, merits additional oversight. We therefore urge the Forest Service to postpone any final decision on the project pending a review for consistency with the new administration's priorities. We further urge the Forest Service to abandon this project to ensure that forest management will conserve roadless forest, prioritize habitat connectivity and biodiversity conservation, and be informed by robust environmental review and public involvement.

We look forward to your reply.

Sincerely,

A handwritten signature in black ink, appearing to be 'Jen Pelz', with a long horizontal flourish extending to the right.

Jen Pelz  
Rio Grande Waterkeeper & Wild Rivers Program Director  
WildEarth Guardians  
[jpelz@wildearthguardians.org](mailto:jpelz@wildearthguardians.org)  
303-884-2702

Delia Malone  
Executive Committee Member and Ecologist and Wildlife Chair  
Sierra Club, Colorado Chapter  
[Delia.malone@rmc.sierraclub.org](mailto:Delia.malone@rmc.sierraclub.org)  
970-319-9498

Gary Wockner  
Executive Director and Co-Founder  
Save the Colorado  
[gary@savethecolorado.org](mailto:gary@savethecolorado.org)  
970-218-8310

Jerry Mallett  
President and Founder  
Colorado Headwaters  
[Jmallett541@gmail.com](mailto:Jmallett541@gmail.com)  
719-221-3307

Juli Silvka  
Conservation Director  
Wilderness Workshop  
[juli@wildernessworkshop.org](mailto:juli@wildernessworkshop.org)  
970-963-3977

CC Leanne Veldhuis, District Ranger, [leanne.veldhuis@usda.gov](mailto:leanne.veldhuis@usda.gov)  
Scott Fitzwilliams, White River Forest Supervisor, [scott.fitzwilliams@usda.gov](mailto:scott.fitzwilliams@usda.gov)  
Tammy Angel, Acting Regional Forester, [tamara.angel@usda.gov](mailto:tamara.angel@usda.gov)  
Jacqueline Buchanan, Deputy Regional Forester, [jacqueline.buchanan@usda.gov](mailto:jacqueline.buchanan@usda.gov)