

Submitted electronically to amy j.titterington@usda.gov

April 17, 2020

Ms. Amy Titterington, USDA Forest Service, Leadville Ranger District 810 Front St., Leadville, CO 80461

RE: Oro Vista Mine

Dear Ms. Titterington:

Please accept these comments on the Oro Vista Mine proposal on behalf of the Colorado Whitewater Association (CW). CW is an all-volunteer, nonprofit organization with over 500 members that promotes the sport of whitewater kayaking in the Rocky Mountain Region. We introduce new kayakers to whitewater, teach paddling techniques, promote and teach whitewater safety, and support racing and freestyle kayak competitions. In addition, our mission is to inform the public about river access, conservation, and other general issues concerning rivers and wilderness, while working to resolve problems related to those issues. CW also is an affiliate club of American Whitewater and supports AW's comments on this proposed mining plan of operations. We also support the comments submitted by Trout Unlimited.

This project concerns CW in that it will impact the recreational use and enjoyment of the Numbers section of the Arkansas River. The Arkansas River – especially the Numbers – is Colorado's premier paddling destination. Residents and visitors alike congregate on the river's many whitewater sections to enjoy the high-quality rapids, stunning vistas, and wild nature. Development of mining activities along the banks near a popular river access point would impair paddling and impact a robust outdoor recreation economy. A dredging operation along the river bank, both on-shore and in-stream mining operations, detracts from the overall experience. Paddlers enjoy the serenity of a natural river environment undisturbed by unnatural features such as mining equipment, noise pollution and air emissions from combustion engines, and water pollution caused by erosive action from a point source discharge associated with a dredging operation.

This project could impact four segments of the Arkansas that have been found suitable for inclusion in the Wild and Scenic rivers system. It is the charge of the Forest Service (USFS) to protect these sections of river and not approve any action that would promote the demise of any identified outstandingly remarkable values. Additionally, Browns Canyon National Monument is not far downstream from the proposed project and is a "congressionally"

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protected" area. Categorical exclusions should not show any negative impacts to that resource either.

As an organization that promotes conservation and enjoying the waterways of the Rocky Mountain Region, Colorado Whitewater opposes this project for the reasons cited above. We ask that the USFS acknowledge and assess the impacts this project will have on paddling, water quality, suitable wild and scenic rivers, fishing, and scenery on the Arkansas River.

Feel free to contact me directly about these comments at tffriday@gmail.com or through our website (https://coloradowhitewater.org/contact-us). We would like to be included in any future notifications related to this project, so please include CW as an interested party. Thank you for considering these comments.

Sincerely,

Tim Friday

Access and Conservation Director

Copy: CW Board Members