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First name: Heather

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Organization: San Luis Valley Water Conservancy District

Title: Manager

Comments: Rio Grande National Forest Staff,

I am writing on behalf of the San Luis Valley Water Conservancy District to provide comments on the Rio Grande National Forest's Over Snow Travel Management Project.

The San Luis Valley Water Conservancy District operates a regional augmentation plan in the San Luis Valley, which includes a broad portfolio of native and transmountain water rights, ownership of Shaw Reservoir, and storage in many reservoirs across the basin. We are also actively engaged in efforts to advance snow measurement and streamflow forecasting science. It is critical to our programs that we are able to access our remote water infrastructure with snowmobiles as well as work with our partners at the NRCS to access SNOTELs and manual Snow Courses.

We do not agree with the proposed action of limiting over the snow travel on roads and trails to snow depths of 12 inches. Snow only accumulates on surfaces that are frozen. Therefore, travel over any solid snow will not cause resource damage. As such, there should not be a minimum snow depth on roads and trails.

In addition to the lack of resource damage, this point also hits on public safety. The primary storage season for reservoirs occurs in the winter and it is critical that we maintain access to our infrastructure. There are times of the year when roads are closed to wheeled travel due to snow, but snow depth is not 12 inches and we need to access infrastructure to ensure everything is in working order. As such, we need to be able to utilize snowmobiles on roads and trails in any snow depth.

Thank you for the opportunity to comment.

Sincerely,

Heather Dutton

Manager, San Luis Valley Water Conservancy District