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San Luis Valley Water Conservancy District

Heather R. Dutton - Manager

December 21, 2017

Dan Dallas
Forest Supervisor
Rio Grande National Forest
1803 US Highway 160
Monte Vista, CO 81144
rgnf_forest_plan@fs.fed.us

Re: Rio Grande National Forest Plan Revision

Mr. Dallas,

The Board of the San Luis Valley Water Conservancy District (District) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and Draft Forest Plan for the Rio Grande National Forest (RGNF). Overall, the District feels the DEIS and Draft Plan set forth a thoughtful strategy for responsible natural resources stewardship.

The District supports the proposed adaptive management component of the Plan, which will allow the RGNF greater flexibility and the ability to respond to changes in resource condition. The District appreciates this addition to the Draft Plan in light of the large-scale changes that have occurred across the landscape in the past decade. We feel the proposed annual "State of the Forest" meetings will provide an appropriate mechanism for the public to remain engaged in forest management and offer feedback on proposed adaptive management.

Regarding the National Wild and Scenic Rivers System, the Draft Plan recommends that 12 stream segments remain eligible and 6 stream segments remain suitable, which is consistent with the 1996 Forest Plan. The Draft Plan also identifies one new recommended eligible reach, Deadman Creek. The District supports the recommendation of these reaches, within the conditions of the USFS Federal Reserved Water Rights, decreed in case 81CW183. The decree defined federal reserved water rights on 303 streams on the RGNF and is the only decree of its kind. The decree specifies that the quantities of water held by the United States are fully sufficient to fulfill any and all federal reserved instream flow water rights that the United States may be entitled to for the Gunnison and Rio Grande National Forest within Colorado Water Division No. 3. It further states that the instream flows decreed to the United States fully satisfy any need for flows in the Gunnison and Rio Grande National Forests. The decree also states that the Forest Service may not seek to increase flows through additional reserved rights or management standards, guidelines, or activities.

The District has many concerns with and is not supportive of the proposed wilderness areas identified within the preferred alternative. As the owner of a ditch that is wholly within the Weminuche

President: M. Dee Greeman, Alamosa, CO
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Wilderness, we are keenly aware of the challenges that arise while performing maintenance and operations using primitive tools. Using shovels instead of motorized equipment, handsaws instead of chain saws, and horses instead of atvs adds time, costs, and complexity to access and management of the ditch. District staff identified at least 7 active ditches that appear to be within the proposed wilderness area in the Sangre de Cristo range (Table 1., Attached). Because the wilderness maps are rather coarse, the District is not absolutely certain these ditches are within proposed wilderness. However, the potential overlap could lead to great challenges for water rights holders and should be considered.

The proposed wilderness area in the Bear Creek drainage above Rio Grande Reservoir also alarms the District. The Beartown Snotel is within this area and, as one of the few Snotels in the Upper Rio Grande basin, is critical for snow measurement and streamflow forecasting for the Rio Grande. Water users, conservancy and conservation districts, the Division of Water Resources, and others utilize the forecast for water rights management and Rio Grande Compact administration. Any potential impact to access and maintenance of the Beartown Snotel would be detrimental to water management. While it is our understanding that the road to Beartown would be excluded from a wilderness area, we remain concerned that access might be limited if snowmobiles are not able to reach the Snotel site by strictly following the road, which often becomes windblown and difficult to pass during the winter. Additionally, our partners with the Rio Grande Headwaters Restoration Project and Headwaters Alliance have recently collected water quality data through the Upper Rio Grande Watershed Assessment that has identified elevated metals in the Rio Grande below Bear Creek. The District is concerned that a wilderness designation would remove the opportunity to remediate impacts to water quality from historic mining, should the RGNF and stakeholders determine such actions would be a benefit to aquatic and riparian health.

Finally, the District has reservations about the proposed wilderness area in the headwaters of the Conejos River between Platoro Reservoir and the existing wilderness boundary. Two SnoLite systems will be installed in this area by the end of 2018. The Conejos Water Conservancy District (CWCD) has obtained a special use permit from the RGNF for installing the equipment, which is greatly needed to add data for streamflow forecasting. When the CWCD sought these permits, they planned installation and management of the SnoLites with mechanized support. A wilderness designation would not necessarily eliminate these systems, but it would add design requirements and additional costs and time for access and maintenance.

We appreciate the opportunity to participate in the Forest Plan Revision process and provide our comments on the DEIS and Draft Plan. Please contact District staff if there are questions about our input.

Sincerely,

Dee Greeman
President, Board of Directors

Attachment – Table 1.

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Table 1. Active Ditches Potentially Within Proposed Wilderness (Alternative B) in the Sangre de Cristo Mountain Range*					
Name	Source	Owner	Uses	Absolute Flow (cfs)	Earliest Appropriation Date
Groy-Ritter Ditch	Longs Gulch	R. Sharpe	Irrigation	3.00	12/31/1890
Cedar Creek Ditch	Cedar Creek	B. Haller	Irrigation	2.00	3/1/1910
Clark Ditch A	Rock Creek	S. Crow	Irrigation	8.84	7/15/1874
Major Creek Ditch	Major Creek	H. Everson	Irrigation	3.90	3/1/1870
Ridenour Ditch	Garner Creek	J. Biggs	Irrigation	0.60	6/1/1881
Ingle Wood Ditch	Burnt Gulch	Not Supplied	Domestic, Irrigation	2.00	5/31/1915
Calkins Ditch	Holbrook Creek	R. King and J. Carrico	Irrigation	12.00	7/1/1894

*The District staff utilized water rights software and the proposed wilderness maps on the RGNF website. The maps are Forest-scale. The information in the table cannot be verified without maps with greater detail.

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