April 17, 2025

Aubrey Bettencourt
Chief, Natural Resources Conservation Service
14th and Independence Ave., SW
Room 5109-S
Washington, DC 20250

Cc: Louis Aspey, Astor Boozer, Richard Fordyce

RE: Request to Exempt the SNOTEL Program from Reduction in Force cuts

Dear Chief Bettencourt,

The forty-nine undersigned organizations and businesses have a shared interest in the information and services provided by the NRCS Snow Survey and Water Supply Forecasting Program (Program). We are extremely concerned that any Reduction in Force (RIF) cuts to this program will severely cripple this Program, with consequential impacts to public safety, outdoor recreation, and western communities.

The Program's SNOTEL network is of particular interest and value to our constituents. This network (SNOTEL) consists of automated stations that collect hourly snowpack and weather data across the mountainous western U.S. and Alaska. The SNOTEL network includes 900 sites and produces forecasts for 600 water supply points. SNOTEL is fundamental to tracking snowpack accumulation throughout the winter and managing western water resources in the warmer months. SNOTEL data informs avalanche forecasting for winter recreation and winter highway safety, provides temperature and snowpack information that is critical for winter recreationists, and informs as risk management for fire, floods, and drought.

SNOTEL data is publicly available through the NRCS website and highly valued by the recreation community. For example, the webpage for the Fischer Creek SNOTEL site, located outside of Cooke City, Montana, is among the top 5 most-viewed SNOTEL web pages, almost certainly because of snowmobilers and backcountry skiers. Cooke City is among the top destinations in the United States for mountain snowmobiling and also very popular for backcountry skiing. Like all SNOTEL stations, the Fisher Creek SNOTEL site provides an accurate and up-to-date tracking of snow amounts. And, like many SNOTEL stations, the Fisher Creek SNOTEL station is critical to informing avalanche forecasting, as it is the only source for high elevation snowpack data for the Gallatin National Forest Avalanche Center in the Cooke City area. Indeed, 50% of the

avalanche forecasting centers in the United States rely on SNOTEL data as their sole source of snowpack and weather information. The highly accurate, hourly, snow accumulation and temperature readings provided by SNOTEL stations help ice climbers, backcountry and cross-country skiers, and other winter recreationists (including commercial outfitters) make decisions about when, where, and how to recreate on a daily basis.

SNOTEL is also critically important to the paddling community. Approximately 75% of the water supply in the western U.S. comes from mountain snowmelt. As a result, SNOTEL data is crucial for dam regulation and water management in the western United States, providing near real-time data on snowpack, precipitation, and temperature, which provides the baseline for river forecasting centers making projections for streamflow and reservoir management. SNOTEL sites are the gold standard for measuring what is happening within a river basin. Not only is the real-time data important to paddlers, but the historic record allows paddlers to compare current conditions with historical norms and outlier events to inform and plan their trips. These data allow paddlers to better understand when high or dangerous flows may occur, allowing recreationists and river outfitters and guides to plan wisely and make safe decisions by knowing and understanding when peak snowmelt flows may occur. In short, SNOTEL data and streamflow forecasts help save lives in all seasons.

The river recreation community has spent years integrating with the larger water community to ensure all water users understand the recreational water uses. SNOTEL sites provide essential data for water users to begin planning for the "water year" ahead. Outfitters regularly check SNOTEL sites throughout the winter to support decision making on hiring, equipment purchases, and marketing. For river reaches below reservoirs, recreationists work with dam operators on opportunities for water releases and rely on NOAA river basin forecast center modeling. SNOTEL data is absolutely critical to those forecasts. Of course, the use of SNOTEL data goes far beyond recreation, as these data are also critically important to the agricultural community, to hydropower utilities, for wildfire season forecasting, for understanding and managing municipal and industrial water supplies, flood preparedness and more. In short, SNOTEL impacts all Americans, whether they're familiar with the program or not.

There is no comparable private, or state-run, program capable of taking the place of the Snow Survey and Water Supply Forecasting Program. A 2010 report[1] by the NRCS documents the value of the timely, accurate, and reliable data provided by this Program as well as the significant cost/benefit ratio of the Program. And, as successful and valuable as this Program is,

[1] A Measure of Snow: Case Studies of the Snow Survey and Water Supply Forecasting Program. Available at www.nrcs.usda.gov/sites/default/files/2022-11/MeasureofSnowFullReport_1.pdf

it cannot function without full staffing. The institutional knowledge and skills of the NRCS staff who work in the Program represent a significant investment of resources over time, with even larger benefits for the American public. These positions require specialized training, skilled mentorship, and years of experience. Recent investments by NRCS to upgrade SNOTEL stations have had a tangible and positive impact on the data valued by the recreation community, such as more sensitive sensors that record hourly snowfall to a highly accurate level. These upgrades were made with the expectation that the Program would be fully staffed and that stations could be fully maintained.

Unfortunately, the SNOTEL program currently has many vacant positions that cannot be filled due to the federal hiring freeze. In addition, while the U.S. Merit Systems Protections Board ruled that the probationary employees who were laid off in February must be reinstated for 45 days, it is unclear whether these employees can or will remain with NRCS for the long-term. Federal travel restrictions can also hamper the SNOTEL program. This past winter, due to reduced staffing and with federal travel restrictions in place, SNOTEL sites were offline for unusually long periods as remaining staff were stretched thin in their efforts to reach remote sites and repair sensitive equipment. If vacant positions remain unfilled and further cuts are instituted through a RIF[2], NRCS will lose its ability to maintain the SNOTEL network to the current standard. Without adequate staffing and budget, the availability and quality of the SNOTEL data and products will be limited, significantly impacting the public safety, recreation, and water management customers who rely upon these data.

Please ensure that the NRCS Snow Survey and Water Supply Forecasting Program is exempted from any RIF actions, that this Program is allowed to fill currently vacant positions, and has adequate funding to support mission-critical employee travel.

Sincerely,

Hilary Eisen
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On behalf of

[2] According to an April 7, 2025 *Government Executive* article, NRCS is expecting a 23% RIF

Access Fund
American Mountain Guides Association
American Whitewater
Audubon Rockies
Backcountry Beauties
Big Mountain Dreams
Bogus Basin Mountain Recreation Area
Boise Backcountry Alliance
Bridger Bowl
Bridger-Teton Avalanche Center Foundation
Carlman Legal Services, LLC
Cascade Backcountry Alliance
Colorado Mountain Club
Colorado Whitewater Association
Cooke City Sinclair and Lodging Inc
Echo Canyon River Expeditions
Elk Mountains Backcountry Alliance
FishSki Provisions
Friends of Plumas Wilderness
Friends of Sawtooth Avalanche Center
Friends of the Inyo
Friends of the Routt Backcountry
High Country Conservation Advocates
Idaho Outfitters & Guides Association
Mammoth Lakes Trails & Public Access Foundation
Montana Alpine Guides
Montana Backcountry Alliance
Montana Mountaineering Association
Moxiecran Media
Outdoor Alliance
Pagosa Nordic Club
RTPacific
San Juan Nordic Club
San Luis Valley Ecosystem Council
Sawtooth Avalanche Center
Select Peaks Publishing
Sheep Mountain Alliance
Snowlands Network

South Yuba River Citizens League
Stock Alpine LLC
Surfrider Foundation
Tahoe Area Mountain Biking Association
Tenth Mountain Division Hut Association
The Mountaineers
The Northwest Avalanche Center
Wasatch Backcountry Alliance
Wild Montana
WildEarth Guardians