HELENA-LEWIS AND CLARK FOREST PLAN OBJECTION

Pages submitted:

1. **Objectors Name and Contact Information**: John Chase; 4436 3rd Avenue North, Great Falls, MT 59405; 406-453-5097; treefarmerjac@gmail.com representing Sun River Watershed Group “past chairman and current Board Member” as well as Cascade Conservation District.

Letters of comment were filed under the name of Cascade Conservation District in 2016, 2017, and 2018 as a board member.

Letters of comment were filed under the name of Sun River Watershed Group in 2016, 2017, and 2018 when I was group chairman. I am no longer in that position, my objections to the issues have not changed.

**2. Signature**: John A. Chase\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

3. **ID of lead objector:** John A. Chase

**4. Name of plan revision being objected to, and the name and title of the responsible official.**

Helena-Lewis & Clark National Forest; Draft Record of Decision; William Avey, Forest Supervisor, Helena-Lewis & Clark National Forest.

5. **Statement of the issues and/or parts of the plan revision to which the objection applies**: Issue #1. Failure to respond to comments regarding irrigated agriculture addressed in our 2018 letter. Disregard of the provisions of the Organic Act of 1897 and the Multiple Use and Sustained Yield Act of 1960.

Issue #2. A significant difference of opinion as to management actions effecting the timing and amount of runoff.

6. **A concise statement explaining the objection and suggesting how the proposed plan decision may be improved**:

Issue #1. The issues of downstream use and benefits has been minimized to the point where they are rendered meaningless in the plan, effectively disregarding the intent of the Organic Act of 1897 and reiterated in the Multiple Use and Sustained Yield Act of 1960.

Suggestion #1. The plan must address the issue above.

Issue #2. We agree that climate change results in earlier runoff, however management practices that allow major losses in canopy cover also effect the timing and amount of runoff.

Suggestion # 2. Please refer to: FORESTS AND WATER; A- State-of- the-Art Review for Colorado, MacDonald and Stednick, 2003

7. **A statement that demonstrates the link between the objector’s prior formal comments and the content of the objection, unless the objection concerns an issue that arose after the opportunities for formal comment;**

Both of the above issues were special points made in earlier comment letters.

8. **All documents referenced in the objection:**

FORESTS AND WATER; A- State-of- the-Art Review for Colorado, MacDonald and Stednick, 2003, Executive Summary paragraphs 3, 4, 5, and 11. In addition, section 2.4, Effects of Fire on runoff.