* **SUN RIVER**

WATERSHED GROUP

July 10, 2020

Helena - Lewis and Clark National Forest Bill Avey, Forest Supervisor

2880 Skyway Drive

Helena, MT 59602

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RE: 2020 Land Management Plan, Helena - Lewis and Clark National Forest, May 21, 2020 Dear Mr. Avey:

On September 25, 2018 and March 18, 2017, the Sun River Watershed Group (SRVVG} submitted letters voicing concerns that the draft Helena-Lewis and Clark National Forest Land Management Plan (Plan} did not address the effects Forest Service land management practices have on downstream water users, specifically downstream water required for agricultural purposes. Since the May 2020 Plan still does not clear1y address this issue, SRWG is compelled to write again and restate our concerns.

Since 1994, SRWG has worked with stakeholders to collaboratively protect and restore the resources of the Sun River Watershed and its communities. This includes, but is not limited to, issues affecting water quality, water supply, and the communities that depend on these resources for their livelihoods. The Sun River watershed encompasses 1,875 square miles from the Gibson Reservoir in the Helena-Lewis and Clark National Forest (HLC}, through parts of Cascade, Teton, and Lewis & Clark Counties, to the confluence of the Sun River with the Missouri River at the city

of Great Falls. Within the watershed**,** over 116,000 acres of agricultural land rely on Sun River

water, sourced from Gibson Reservoir, which is fed by precipitation and streams originating in the HLC.

As stated in the Plan, the Sun River watershed is a major drainage of the HLC and "...the preponderance of water is quickly captured in reservoirs (including Gibson Reservoir] for irrigation and other agricultural use." Therefore, the Plan identifies agriculture as a downstream land use and the HLC as an important source of that water. However, the Plan fails to recognize the

connections between HLC land management practices and the effects of those practices on downstream water supplies and linked uses. SRWG points to statements made by attorney John Bloomquist at the March 2018 Montana Water Policy Interim Committee meeting indicating that the FS has a duty and obligation to manage land for *multiple uses,* taking into consideration *entire watersheds, including areas downstream* and not immediately within the FS boundaries.

Bloomquist's points are supported by the Multiple Use Sustained-Yield Act of 1960 and the Organic Act of 1897. In addition, the 2012 United States Forest Service Planning Rule, which guides FS land use plans, clearly specifies forest plans must consider "[f]orestwide components to provide for integrated social, *economic,* and ecological sustainability... while providing for ecosystem services and *multiple uses"* and ·[t]he plan area's distinctive roles and contributions *within the broader landscape·* (emphasis added).

In spite of the above, the FS has again failed to clearly acknowledge and address downstream water supply in Plan considerations. In the Plan introduction, under the sub-header "Social and economic characteristics", there is a brief mention of small ranching operations, but no

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WATERSHED GROUP

acknowledgement that the Sun River watershed downstream of the HLC is a major agricultural region - part of Montana's Golden Triangle, one of the most productive wheat and barley growing regions in the United States. Local economies are based on agriculture - growing, processing, and distributing food for the entire nation. Pasta Montana in Great Falls, for example, produces 55-80 million pounds of pasta annually. HLC water is necessary to support agriculture and the communities and people who depend on it.

The Plan's approach to Fire Management has been a key concern for SRWG, due to the effects of large-scale and intensive bums on water supply and water quality downstream. We appreciate that FS management actions in Wilderness Areas, as at the headwaters for the Sun River, are limited by the Wilderness Act of 1964. However. this is even more reason for increased diligence to fire management in the HLC surrounding designated Wilderness Areas - to prevent spread of fire to areas where such actions are restricted. Reducing spread of fire to the Wilderness Area protects vegetation necessary for regulating runoff that benefits downstream uses, such as agriculture and municipal **water** supplies in Sun River farms and communities.

In response to concerns stated by SRWG and others, the FS indicates that climate change *is* the major influence on runoff timing (in responses to CR48, 183, 237, and 257). However, the amount and condition of forest cover are also key contributors to runoff timing and volumes. On the Rocky Mountain Front. reduced or complete removal of forest canopy (such as by fire or intentional removal) will increase the rate of spring runoff, increasing the peak by approximately 40-50%. This accelerated runoff affects water management and water rights of irrigation districts and producers in the Sun River watershed. The Plan does not discuss how the proposed management practices will affect or consider snowpack, runoff rate, or peak timing.

Downstream water supply and quality are also not addressed in the Monitoring Program *in* any meaningful way. Monitoring questions, indicators, and measures are vague; goals are not stated; and no actions are prescribed. The Monitoring Program fails to consider effects of fire and vegetation on snow pack or water supply inside or outside the HLC.

SRWG and local irrigation districts were not consulted in the development of this plan, and though all have submitted comments requesting such consideration, the Plan still fails to acknowledge the effects of HLC land management on irrigated agriculture in a region where crop production is a major revenue stream. In this way, the Plan is also ignoring potential negative effects of HLC land management on the local and state economy.

SRWG sincerely hopes the USFS will issue a final Plan that considers the effects of HLC land management on the downstream lands, communities. and economies, and will choose to proactively and *truly manage its resources for watershed-wide, multiple uses for the benefit of public.*

Sincerely,

Sun River Watershed Group