

July 20, 2020

USDA Forest Service  
Objection Reviewing Officer, Northern Region  
26 Fort Missoula Road  
Missoula, MT 59804

RE: Objection to Helena – Lewis & Clark National Forest Land Management Plan  
Failure to Account for Unique Social and Economic Needs of Affected Communities

Objection Reviewing Officer:

The Fort Shaw Irrigation District (FSID) has been engaged in the Plan Review process for the last 4 years. We have provided our concerns and comments, and reached out to our Federal representatives. **Our greatest concern is the Management Plan fails to adequately acknowledge and address the economic and social impacts that forest management practices have on downstream affected communities. Specifically, FSID is concerned that current and future forest management practices will have a detrimental impact on our senior water rights on the Sun River.**

The Sun River Watershed irrigated agriculture is critical to the regional economy. The quantity and quality of water comprising the watershed is the single most important factor affecting our region. The watershed provides water to Fort Shaw Irrigation District, Greenfield Irrigation District, Nilan Canal Users, Sun River Canal Company, The Broken O Ranch and several other private irrigation rights. Combined there is between 130,000 and 150,000 acres of irrigated ground that rely on the Sun River Water Shed. Most of this water originates in the forest and alpine areas located in the Lewis & Clark National Forest. In fact, Greenfield's primary storage reservoir, Gibson Dam, is located at the head waters of the Sun River. Also, the Nilan Reservoir captures water from the south fork of the Sun River.

It is well known that the two most significant components of the forest ecosystem which impact water quality, water quantity, and the seasonal run-off is impacted by the forest canopy and related ground cover. Devastating forest fires destroy the canopy and cover thus detrimentally impacting the run-off characteristics of the watershed. Without sufficient ground cover and canopy, erosion is unchecked reducing valuable storage in Gibson Dam as well causing faster spring runoff that results in flooding of our communities along the Sun River.

FSID acknowledges forest fires are natural and can be rejuvenating to the forest. However, the massive, out-of-control, intense forest fires can permanently alter the forest landscape. There must be a balance, a healthy middle ground. We believe this can be achieved by



aggressively managing the forest canopy and ground cover to avoid the widespread, intense, and destructive forest fires. Such aggressive management practices should consist of mechanical thinning, selective harvesting, and strategic, prescribed burns.

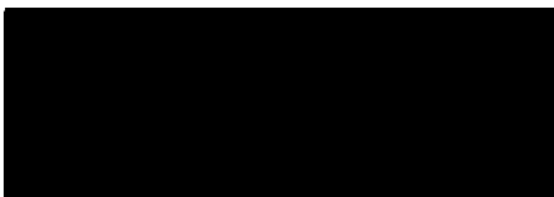
"Let-it-burn" is not a proactive fire management strategy and will not produce any desirable effects. However, fire suppression with an aggressive fuel reduction program is a proactive fire management strategy. More emphasis should be placed on fire suppression strategies until the fuel reduction objectives have been adequately achieved. Also, more emphasis and incentive needs to be placed on extinguishing fires before they become catastrophic and unmanageable. This is especially important because fire suppression efforts are typically withdrawn for safety concerns when fires become catastrophic and out-of-control.

Simply put, the existence of a healthy forest canopy and floor cover are critical to a healthy watershed. The tree canopy also delays and prolongs spring run-off. The floor cover is truly the only guard against detrimental erosion and the subsequent sedimentation into storage reservoirs and dams on the Missouri River.

Because there is such reliance on the Sun River watershed, the forest canopy and ground cover need to be proactively and aggressively managed. The proposed H-L&C National Forest Land Management Plan does not provide such assurances because it fails to account for the unique social and economic needs of the downstream affected communities; especially those with established senior water rights.

FSID sincerely hopes that the NFS will amend the proposed plan to include the needs of all water users along with thoughtful well planned fuel reduction efforts over allowing devastating uncontrolled wild fires. Limited fires, whether natural or prescribed, can be healthy. Out-of-control, widespread, intense burns are not healthy. Downstream affected communities and senior water right holders need to be considered.

Respectfully,



C: Bill Avey, Helena-Lewis & Clark National Forest Supervisor  
GID Board  
Steve Daines, MT Senator



# Helena-Lewis and Clark National Forest Land Management Plan Revision Objection Template

Please specify whether this objection is to the **Helena-Lewis and Clark National Forest Land Management Plan** or the Regional Forester's list of species of conservation concern (SCC) by checking the applicable box:

☒ Land Management Plan

☐ Regional Forester's List of SCC

## Statement of issues and/or parts of the plan revision to which the objection applies:

Fort Shaw Irrigation District objects to The proposed Lewis and Clark National Forest Land Management Plan's failure to: 1.) adequately acknowledge and account for the social and economic needs of downstream communities and all users that rely on the waters that originate from the water shed. 2.) The connection between proper and sufficient forest canopy and ground cover management and the watershed on which these communities rely. An inadequate forest fuel management plan and fire suppression strategy increases the chances for devastating forest fires which in turn increases the potential for water quality and quantity and detrimentally impacts the characteristics of seasonal run-off.

## Concise statement explaining the objection and suggesting how the proposed plan should be improved:

### ISSUE #1

**Objection** – The Land Management Plan fails to adequately acknowledge and address the social and economic concerns of the affected communities and all water users that rely on the Sun River watershed downstream of the National Forest.

**Solution** – Emphasize in the entire Plan that Forest land management practices have an impact to land, water and communities outside the National Forest Service boundaries while providing for the Plan provisions that address these concerns.

### ISSUE #2

**Objection** – Because of the Management Plan's failure to adequately account for downstream water users, as referenced above, the Plan fails to provide sufficient, proactive management practices thereby ensuring a healthy and sufficient forest canopy and ground cover. The impact of such practices and the relationship between forests and watersheds are detailed and discussed by Lee MacDonald and John Stednick in the classic 2003 research paper: *Forest and Water*.

**Solution** – Amend the Plan to incorporate an aggressive and proactive fuel load reduction strategy to prevent widespread, intense, out-of-control forest fires that permanently alter the forest ecosystem. Unplanned fires need to be aggressively suppressed and controlled to avoid dangerous, widespread, devastating fires that grow "out-of-control". Proactive fuel load reduction will also help reduce the likelihood of out-of-control burns.



**Statement demonstrating the link between objection and prior formal comments:**

Both issues and objections have been repeatedly made since 2016 in formal letters to the NFS.

**Signature:** Joe Synalness, Chairman Soil Shaw Irrigation District

**Send electronic objections via:** the CARA objection webform at <https://cara.ecosystem-management.org/Public/CommentInput?project=44589>. Electronic submissions must be submitted in a format (e.g. Word, PDF, Rich Text) that is readable with optical character recognition software and be searchable.

**Send written objections to:** USDA Forest Service, Objection Reviewing Officer, Northern Region, 26 Fort Missoula Road, Missoula, MT 59804. Office hours are Monday through Friday, 8:00 a.m. to 4:30 p.m., excluding Federal holidays.

**Send faxed objections to:** (406) 329-3411.

The fax coversheet must include a subject line with "Helena – Lewis and Clark Land Management Plan Objection," or "Helena – Lewis and Clark Species of Conservation Concern" and should specify the number of pages being submitted. Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8:00 a.m. and 8:00 p.m., Eastern Standard Time, Monday through Friday.

