Data Submitted (UTC 11): 7/16/2020 6:00:00 AM
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Organization: Sun River Watershed Group
Title: Past chairman and current board member
Comments: Our organization's comments are attached.

OBJECTIONS TO FOREST PLAN

OBJECTION #1

The Draft Plan makes numerous references to the wide variety of benefits provided by the Forest. This is certainly desirable; it is important that the American people be appraised of the benefits provided by our public lands. We do not understand why Helena/Lewis & Clark National Forest is so determined to minimize to the point of insignificance one of the largest economic benefits to the region in the development of this plan. Touting the benefits and number of associated jobs generated, and at the same time minimizing one of the largest uses of a product of the forest is a significant issue with us. Water for irrigated agriculture has significant economic impact on three counties, portions of which lie within the Sun River Watershed.

Please recognize that this water originating on the Forest destined for downstream uses like agriculture is one of the specific reasons the forest reserves were established in the Organic Act of 1897 and reaffirmed in the Multiple Use/Sustained Yield Act of 1960. "Public forest reservations are established to protect and improve the forest for the purpose of securing a permanent supply of timber and ensuring conditions favorable for continuous water flow[hellip][hellip]." We read this to mean that a principal product of the forest is water for beneficial use downstream: for planners to virtually ignore the issue of irrigated agriculture is to disregard a primary purpose in the establishment of the forest. The presence of Gibson Dam and Reservoir within the forest boundaries and expressly constructed for the purpose of irrigation water storage, along with the very extensive irrigation infrastructure in the three downstream counties should make it clear to forest planners that water as a product of the forest is extremely important for downstream users. BECAUSE OF ITS HUGE BENEFIT TO HE LOCAL ECONOMY NOT [hellip]. DISCUSSION IT IS BA MENTIONED AS A BENEFIT IN THE DRAFT PLAN!

OBJECTION #2

In your responses to # CR48, CR183, CR237, and CR257 to our comments that loss of forest cover has the potential to influence the amount and timing of runoff; you state that it is actually climate change as the reason for earlier runoff. I believe that it is a well-established fact that the generally earlier dates for start of regional runoff is indeed the result of a changing climate. That is not the issue that we were attempting to express concern about. Whatever is occurring on a regional scale because of climate change, within that model local conditions such as the amount and condition of forest cover is still going to have a significant influence of the amount and timing of runoff. "Reduced or complete removal of forest canopy will significantly increase the rate of spring runoff (MacDonald and Stednick, Forests and Water, 2003)." We have attached the research paper as noted below.

You stated in CR51 and CR53 that your monitoring program has used the best scientific approach available and a monitoring guide is not required, but we feel a more detailed monitoring program in this plan would be useful in resolving many of the concerns described by several reviewers. The current plan has too many assumptions that a more detailed monitoring program would resolve, ensuring everyone is on the same page of what is really occurring on-the-ground.