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First name: Ross
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Organization: Teton Conservation District
Title: chair
Comments: Dear Mr. Avey:

On March 27, 2017, Teton Conservation District submitted our letter outlining recommendations for the draft Helena-Lewis and Clark National Forest Land Management Plan. The Board recognizes the forest service, managing the forest canopy which borders the Upper Missouri River Basin directly affects water quality and quantity when the forest is affected by fire, prescribed bums or recreational uses. We are writing again to emphasize the land management practices proposed in Alternative F directly affects downstream water users and water required for agricultural purposes.

The Teton River headwaters are in the southern Lewis Range of the Rocky Mountains at the continental divide in the Lewis and Clark National Forest. It flows southeast, then east, down from the Lewis mountains and across Teton County, past the City of Choteau and joined by Muddy Creek and Deep Creek. The Teton Watershed impacts water quality, drinking water and agricultural needs within Teton County.

The Sun River Watershed, from Gibson Reservoir in the Helena-Lewis and Clark National Forest (HLC) through parts of Cascade, Teton and Lewis & Clark Counties. With this watershed, agricultural acreages rely on the Sun River, sourced from Gibson Reservoir fed by precipitation and streams originating in the HLC.

The Plan identifies agriculture as a downstream land use and the HLC as an important source of that water. We express our concern the plan needs to better illustrate the connections between HLC land management practices and the effects of those practices on downstream water supplies and linked uses.

The 2012 United States Forest Service Planning Rule, which guides forest service land use plans specifies forest plans must consider forest wide components to provide for integrated social, economic and ecological sustainability. The Plan identifies"... the Forest provides abundant water for drinking and downstream uses as well as four municipal watersheds[hellip]. The Forest is also the headwaters of the groundwater aquifers to the east." In our previous letter, the importance of water is critical to the agricultural economy including irrigation water, groundwater aquifer recharge and water rights. As this is a guidance document, we recommend adding wording to include: "The Forest provides water which impacts the State of Montana's System of Water Law and its State Water Plan for the Upper Missouri Basin Watershed Management Plan."

Plan language notes water, upon exiting the forest boundary is captured in reservoirs for agricultural use. Additional language should be added to state the water is then used beneficially for agricultural needs of the local farmers and ranchers under the State Water Plan document and Montana's system of water law.

While the Plan briefly mentions small ranching operations within the Plan introduction under the subheading "Social and Economic Characteristics", this needs to be expanded to state the Teton and Sun River Watersheds downstream of the HLC is a major agricultural region and benefits the local economies surrounding it. Agricultural water usage needs are done under the State Water Plan document and Montana's system of water law.

The Plan indicates that climate change is the major influence on runoff timing. However, the condition and amount of forest cover are key contributors to runoff timing and volumes. On the Rocky Mountain Front, reduced or complete removal of forest canopy by fire or intentional removal increases the rate of spring runoff. Accelerated runoff affects water management and water rights of irrigation districts and producers in our county.

We encourage reconsideration of addressing downstream water supply and water quality in the Monitoring Program. The State of Montana Water Plan discusses the Upper Missouri River Basin Climate Impacts Assessment should be referenced in the Monitoring Program and included as part of the Forest Service adaptive management strategy. Using existing State and local reports and resources will minimize fiscal costs for the taxpayer and address issues of local concern to residents.

Climate change, drought, floods, wilderness management and fire are all part of natural resource land management practice considerations the forest service has to assess within their forest plan revisions. Recognize each of these impacts downstream watershed management including water usage, irrigated land, water rights and the economical sustainability of local communities surrounding forest service lands. It is the Board's request the Forest Service will issue a final Plan which considers the effects of HLC land management on the downstream lands. The management of forest service lands impacts three levels of government (local, State and Federal) and the ideal goal is to proactively manage the Rocky Mountain Region identified in your report to minimize conflict, promote alliance, cooperation and public benefit.

We welcome the opportunity to be a collaborative partner as you continue in the NEPA process. Sincerely,