



Montana
Native
Plant
Society

To observe - conserve - educate

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Montana Weed Management Task Force
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Dear Montana Weed Management Task Force:

We are writing on behalf of nearly 500 members of the Montana Native Plant Society (MNPS). We are an organization dedicated to preserving, conserving and studying the flora of Montana and educating the public on the values of the native flora and its habitats. We are writing to comment on the Restoration and Reclamation section of the revised Montana Weed Management Plan.

We are pleased that the Weed Task Force recognizes the importance of restoration in weed management. Having and maintaining healthy native plant communities is an important way to slow or prevent the re-establishment of weeds after they have been treated mechanically, chemically or with biological control. It is an essential part of integrated pest management. The nine action needs address many important issues, including monitoring, research and education as well as developing and making available weed-resistant seed mixes. We do have suggestions for how some of the action needs might be better articulated.

Action need #1 suggests that areas treated for weeds be monitored to determine if revegetation is needed. We believe that the need for revegetation should be determined before treatment so that seeding can be done soon after the weeds have been removed and before the treated species or other weed species recolonize the site. There is often only a short window in which to establish native vegetation, and in many cases a second seeding may be required. Monitoring is required to determine which native species established well and whether a second seeding is desirable.

Action Need #2 states the need for standardized guidelines for native revegetation. We believe that these guidelines should discourage the use of invasive, non-native species, even if they are not considered noxious (e.g., sweetclover, crested wheatgrass, smooth brome). The guidelines should address the issue of when it may be appropriate to use non-invasive non-native species (e.g., wheat, rye, clover). Finally, there should be guidance on using native cultivars developed from non-local populations as opposed to local sources. Non-invasive non-natives,

cultivars and locally-collected seed may each be appropriate under some circumstances. There are several good articles on this subject:

Jones, T. A. 2003. The restoration gene pool concept: beyond the native versus non-native debate. *Restoration Ecology* 11: 281-290.

Knapp, E. E., and K. J. Rice. 1994. Starting from seed: genetic issues in using native grasses for restoration. *Restoration and Management Notes* 12:40-45.

Lesica, P. and F. W. Allendorf. 1999. Ecological genetics and the restoration of plant communities: mix or match? *Restoration Ecology* 7: 42-50.

Linhart, Y. B. 1995. Restoration, revegetation, and the importance of genetic and evolutionary perspectives. Pages 271-287 in B. A. Roundy, E. D. McArthur, J.S. Haley, and D. K. Mann, editors. *Proceedings of the Wildland Shrub and Arid Land Restoration Symposium; 1993 October 19-21; Las Vegas, Nevada*. USDA Forest Service General Technical Report INT-GTR-315, Ogden, Utah.

Wilkinson, D. M. 2001. Is local provenance important in habitat creation? *Journal of Ecology* 38: 1371-1373.

Action Need #4 doesn't seem to have anything to do with restoration or revegetation.

In the Action Plan, #30 mandates development of guidelines for restoration after fire or other disturbances. However, there is no mention of revegetation following weed control efforts. In cases where infestations are dense, revegetation is necessary if weed control is to be effective; otherwise weeds will simply recolonize the site, and control efforts will be required again. Considering revegetation should be part of every integrated weed management plan.

The Montana Native Plant Society urges the Weed Task Force to continue their efforts to protect Montana's native plant heritage by promoting enlightened, science-based management of invasive exotic weeds. Thank you for considering our comments.

Sincerely,

Elizabeth Kuropat
President

Peter Lesica
Conservation Chair