Montana
Native
Plant
Society

To observe - conserve - educate

P.O. Box 8783 Missoula, MT 59807

30 May 2013

Bureau of Land Management
Billings Field Office
Attn: Carolyn Sherve-Bybee
5001 Southgate Drive
Billings, MT 59101

Dear Billings Field Office,

We are writing on behalf of the 600 members of the Montana Native Plant Society. We are an orgarization 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 commenting on the Billings Field Office Draft Resource Management Plan and Environmental Impact Statement. Thank you for considering our comments that are presented below.

Regards,

David Hanna
President

Peter Lesica
Conservation Chair

Chapter 2, Page 52 Climate Change The alternatives are different in how they relate to climate change. Climate change is predicted to bring a warmer and drier climate to interior western North America. This means that water will become more precious and distribution of water among livestock operations, farming, fisheries and wildlife and wetland and riparian vegetation will become contentious. Thus, maintaining in-stream flows that benefit wildlife will become even more important as the climate warms etc. In this way the various alternatives are different in how they deal with climate change. Drought and grazing have similar effects on rangelands by favoring lower-growing, less productive species. As the climate warms, stocking rates will probably have to be adjusted down. Again, different alternatives deal with livestock grazing differently and this relates to climate change.

Chapter 2, Page 59, Rangelands Two studies by the Montana Natural Heritage Program indicate that Wyoming big sagebrush recovers very slowly after fire. Prescribed fire may not be a good way to restore habitat diversity in sagebrush stands.

Chapter 2, Page 60 Rangelands BLM manages a great deal of rangeland that has been converted to crested wheatgrass. Some of these stands have been significantly invaded by native species while others have maintained their monoculture character. It would be good if restoration was prioritized to concentrate on those areas that are near monocultures of crested.

Chapter 2, Page 62 Invasive species Early detection and control is key to managing invasive species (see Invasive Plant Science and Management (2013) 6: 48-59 and references therein).

Chapter 2, Page 83 Wild Horses There is no mention of wild horse impacts on special status plants and yet some special status plants occur on the wild horse range. Areas of potential conflict between horses and special status plants should be given priority for monitoring. There is a 1995 report done by Lesica and the Montana Natural Heritage Program that outlines the possible threats to *Lesquerella lesicii.*

Chapter 2, Page 148 East Pryor ACEC There is no mention of alternative management strategies that will mitigate possible conflicts between wild horses and special status plants. There is a 1995 report done by Lesica and the Montana Natural Heritage Program that outlines the possible threats to *Lesquerella lesicii.*

Herbicide application should only be by hand, not by boom or aerial in order to protect special status plants.

Chapter 2, Page 153 Grove Creek ACEC Herbicide application should only be by hand, not by boom or aerial in order to protect special status plants.

Chapter 2, Page 155 Meeteetse Spires (also Appendix E-22) There may be some historic value to this ACEC. Wasn't this an important trail for early settlers and maybe even Native Americans? Herbicide application should only be by hand, not by boom or aerial in order to protect special status plants.

Chapter 2, Page 160, Pryor Foothills ACEC This area has very low precipitation. Consequently the vegetation can easily be degraded by livestock grazing. Herbicide application should only be by hand, not by boom or aerial in order to protect special status plants.

Chapter 2, Page 172, Pryor Mtns. Horse Range Enhancing the grasslands and shrublands should be done only with native plants. These native habitats did not evolve with horse grazing; horses are not native animals. Restoration should not be done with the intent to increase horse numbers. Horse numbers should be kept low in order to allow successful restoration of habitat that is important for native species of animals and plants.

Page 173 Collecting of special status plant species should be by permit only (same as Alternative C).

Chapter 2, Page 181, Rangelands Two studies by the Montana Natural Heritage Program indicate that Wyoming big sagebrush recovers very slowly after fire. Prescribed fire may not be a good tool to restore age-class diversity in sagebrush stands.

Chapter 3, Page 40 Crested wheatgrass should be mentioned in Table 3-12.

Chapter 3, Page 41 Table 3-13 Utah juniper (*Juniperus osteosperma*) occupies many thousands of acres on the south side of the Pryors.

Chapter 3, Page 44, Rangelands A Montana Natural Heritage report describes several plant communities from the Pryor Mtns. that are considered rare in Montana. Recognizing and doing protective management is a "coarse-filter" approach to conserving biological diversity. The existence of these communities is mentioned in the ACECs and should also be mentioned here.

Chapter 3, Page 112, Wild Horses Figure 14 of Ricketts et al. (2004) indicates that much of the Sykes Ridge area (mid-elevation) has an SI index of 0.10 which is very poor condition as we understand it. Many of the steep slopes provide little forage but are still subject to trampling degradation.

Chapter 4, Page 159, Impacts from vegetation Impacts from timber harvest in a watershed may not always be "negligible." Loss of trees can cause more water going into shallow groundwater and eventually into streams because trees take up water and lose it through transpiration. Removing trees can result in greater snowpack and higher groundwater. Removing trees can also cause higher/earlier runoff due to lack of shade protecting the snowpack.

One rangeland improvement action can be the construction or maintenance of stock ponds. These ponds can capture significant amounts of spring runoff that would otherwise be transported downstream and possibly causing the flood conditions necessary for cottonwood and willow rejuvination.

Chapter 4, Page 222, Special Status Plants Herbicide treatment by airplane or boom sprayers is much more likely to be detrimental than by hand spot spraying.

Chapter 4, Page 224 Impacts from livestock grazing Many special status plants are broad-leaved forbs. Forbs are often benefitted by cattle grazing that helps to reduce the dominance of grasses. In some cases removing grazing pressure could cause a decline of special status broad-leaved forbs; this possibility should always be considered.

Chapter 4, Page 549 East Pryor ACEC The draft RMP states that Alternative D would designate 11,122 acres and that this is more than Alternative A, but under the Alternative A section, it states that the ACEC would be 29,550 acres. Clearly Alternative D designates less that Alternative A; i.e., Alternative D reduces the acreage of East Pryor ACEC by two-thirds.

Three species of globally rare vascular plant species occur in the East Pryor Mountains area. *Erigeron allocotus* occurs only in the Pryor and Bighorn mountains; *Shoshonea pulvinata* is found only in the Pryor Mountains and the foothills of the Absaroka-Beartooth; and *Physaria* (=*Lesquerella*) *lesicii* is known only from the Pryor Mountains. Populations of all three species should be protected by ACEC designation. Although Wilderness Study Area (WSA) designation will preclude motorized vehicle use, it is not adequate to protect these plants from habitat degradation caused by livestock or wild horses and does not mandate periodic monitoring that should be conducted. In order to protect significant populations of these species we recommend that the East Pryor ACEC encompass at least the BLM land in the following sections: T8S R28E sections 20, 21, 28, 29, 30, 31, 32, 33 and T9S R28E sections 4, 5, 6, 8, 9, 10, 15, 16, 17, 20, 21, 22.

Chapter 4, Page 553, Grove Creek ACEC The size and location of the Alternative D proposed ACEC are appropriate.

Chapter 4, Page 554, Meeteetse Spires ACEC Livestock grazing is allowed under all alternatives. It might be good if livestock management maximized range condition, although this is probably mentioned in the Rangelands & Shrublands section. The size and location of the Alternative D proposed ACEC are appropriate.

Chapter 4, Page 562, Pryor Foothills ACEC A Montana Natural Heritage report describes several plant communities from the Pryor Mtns. that are considered globally rare as well as rare in Montana. Many of these occur in the Gyp Springs area. These communities are just as important for conservation as the special status species. Recognizing and doing protective management for these communities is a "coarse-filter" approach to conserving biological diversity. We believe that the ACEC boundaries should be extended west to include Section 30 which has large outcrops of Chugwater sandstone which is associated with the *Atriplex nuttallii/Artemisia spinescens* community as well as populations of *Leptodactylon caespitosum* and *Mentzelia pumila*. It would also be good to include at least a portion of Section 31 which has extensive stands of *Artemisia pedatifida*-dominated communities which are rare in Montana. Soils in this area are very highly erodible, and soils on many of the slopes are protected from erosion by fragile communities of lichens and mosses. Oil and gas exploration could be disastrous to the fragile soils and vegetation in this area. It would also be good to limit or discontinue livestock grazing when it is feasible in order to prevent trampling on the slopes. It seems unlikely that these six sections provide significant forage for livestock.