Montana
Native
Plant
Society

To observe - conserve - educate

P.O. Box 8783 Missoula, MT 59807

9 May 2013

Bureau of Land Management
Miles City Field Office
111 Garryowen Road
Miles City, Montana 59301-0940

Dear Miles City Field Office,

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

Regards,

Dave Hanna

President

Peter Lesica

Conservation Chair

Chapter 1, Page 4, Issue 1 A large proportion of land in the MCFO area is LU Land, most of which is dominated by crested wheatgrass. Numerous studies have shown that crested wheatgrass-dominated vegetation is poor wildlife habitat and poor for livestock except in the spring. This should be a huge issue for the Miles City District, but it seems to be completely under the radar screen.

Chapter 1, Page 5, Issue 2. Three of the sensitive plant species in the MCFO are considered globally secure so they are under no "risk of future federal listing under the ESA."

Chapter 1, Page 5, Issue 3 Motorized vehicles have been shown to be the single most important vector for the transport of invasive, exotic plants. This should be a priority consideration when dealing with travel management.

Chapter 1, Page 6, Issue 5 Left out the word "critical" in the second paragraph.

Chapter 1, P. 9, Issue 1 Again there is no mention of the thousands of acres of crested wheatgrass and the possibility of restoration.

Chapter 1, Page 12, Climate Change Most ecologists agree that climate change will eventually spawn new plant communities. It would seem to make more sense to try to preserve ecosystem functions and services regardless of the changing community composition. I suggest you talk to David Wood in the State Office about this.

Chapter 2, Page 22, Hardwood draws The natural disturbance regime of hardwood draws is not known because dendrochonological analysis has not and probably cannot be done. Rather, good-condition draws should be managed to keep them in good condition, and restoration of poor-condition draws should be attempted when possible.

Springs are sometimes developed in hardwood draws. Having a developed spring is usually not by itself that harmful as long as the stock tank is placed well away from the draw.

Chapter 2, Page 23, Riparian and wetland areas Wetland and riparian area boundaries should be determined using standard wetland delineation procedures.

Chapter 2, Page 24, Riparian and wetland areas Having a developed spring is usually not by itself that harmful as long as the stock tank is placed in uplands well outside the boundary of the wetland or riparian vegetation.

Chapter 2, Page 26, Invasive species Several studies have shown that the most effective way to manage weeds is to maximize early detection and prioritize eradication of new (i.e., small), satellite colonies (see Invasive Plant Science and Management (2013) 6: 48-59 and references therein).

Chapter 2, Page 74, Cottonwood trees Cottonwood stands are self-thinning, so it is difficult to imagine when harvest would be needed to restore health to these stands.

Chapter 3, Page 29, Surface water. There is no mention of the numerous stock pond impoundments that are present on BLM lands in eastern Montana. These impoundments trap surface water during spring runoff that would otherwise help to cause the downstream flooding that is necessary for the regeneration of cottonwood and willow habitats which, in turn, support numerous species of wildlife.

Chapter 3, Page 45, Vegetation Hardwood draws are given their own section under vegetation in Chapter 2 but are not mentioned in Chapter 3.

Chapter 3, Page 45, Grasslands A large portion of the grassland mentioned in this short section is L.U. land that was farmed 100 years ago and then converted to near-monocultures of crested wheatgrass. This is an important element of the affected environment and should be mentioned.

Chapter 3, Page 45, Shrublands *Artemisia tridentata* ssp. *tridentata*, *A. tridentata vaseyana, A. nova*, and *Purshia tridentata* do not occur on the MCFO lands.

Chapter 3, Page 47 Table 3-47 *Astragalus aretioides, Cleome lutea, Erigeron allocotus, Grayia spinosa*, and *Sullivantia hapemanii* do not occur in the MCFO area and are not likely to occur there.

Chapter 4, Page 50, Management common to all alternatives There is no mention of stock ponds. How would the construction of new stock ponds affect the downstream environment? How would the decommissioning of stock ponds affect the downstream environment?

Chapter 4, Page 86, Assumptions and Methodology Many people in BLM are working to increase the amount of sagebrush on public lands to protect sage grouse, but this section states that sagebrush will not be restored but rather will be treated with herbicide. This needs further clarification.

Chapter 4, Page 87, Management common… "Natural recovery" of hardwood draws is unlikely because the understory of many of these habitats is now dominated by exotic rhizomatous grasses. It would be better to emphasize the conservation of good-condition draw vegetation by manipulating season of livestock use and controlling deer browsing. Data suggest that natural disturbances such as fire do not necessarily maintain hardwood draws. MSU Extension just published a bulletin that summarizes what is known about hardwood draws in Montana.

There is a large body of research indicating that hoof action can also destroy vegetation and soil crusts that protect the soil from erosion.

Chapter 4, Page 88 "The potential for reestablishment of sagebrush shrublands" using fire will depend on the species of sagebrush. Silver sagebrush sprouts back after fire, while research indicates that Wyoming big sagebrush may take a century to recover after fire (see Cooper et al. 2007, Montana Natural Heritage Program).

Chapter 4, Page 91, Alternative E Surface-disturbing activities should be minimized across the planning area to help prevent the introduction and spread of weeds. Sensitive species and plant communities such as hardwood draws should be protected from surface-disturbing activities. Disturbed surfaces should be restored with native vegetation as quickly as possible and monitored for weed invasion and restoration success for at least five years.

Early detection of weeds is essential (see Invasive Plant Science and Management (2013) 6: 48-59 and references therein).

There is no mention of restoration. Restoring sagebrush has been a priority for land management agencies. Restoring rangelands dominated by crested wheatgrass should be a priority. There have been attempts to restore crested fields in the MCFO area. These actions should be mentioned and encouraged in the preferred alternative.

Chapter 4, Page 92, Cumulative impacts This section talks about soils, not vegetation, but it is under the vegetation section.

Chapter 4, Page 94, Alternatives common… Periodic livestock grazing may be the best approach for maintaining or restoring good condition hardwood draws. Grazing creates disturbance that can result in tree seedling establishment, followed at least 2 seasons of rest that allows for the growth of these seedlings.

There should be mention of man-made impoundments; there are very many on public lands. Stock ponds at the head of drainages have the potential to reduce stream flows during spring runoff, thereby reducing downstream flooding and establishment of desirable species such as cottonwood and willow.

Chapter 4, Page 105, Alternative E If springs are developed in wetlands, riparian areas, or hardwood draws, the water should be pumped or gravity-fed to upland sites to prevent attracting livestock into sensitive and important wildlife habitat.

Chapter 4, Page 106, There is no evidence that harvesting cottonwoods would "maintain or improve the integrity and functionality of riparian and wetland areas by maintaining cottonwood health." Cottonwoods establish on bare, mineral soil created by flooding. Harvesting has no effect on this process. Harvesting cottonwood would simply reduce the number of trees present, thereby reducing wildlife habitat and perhaps allowing tamarisk and Russian olive to invade.

Chapter 4, Page 108, Cumulative impacts It should be mentioned that these crested wheatgrass fields are often near-monocultures that provide poor wildlife habitat.

Chapter 4, Page 109, Management common… Monitoring in addition to restoration is needed following all disturbance activities.

Several studies have shown that the most effective way to manage weeds is to maximize early detection and prioritize eradication of new (i.e., small), satellite colonies (see Invasive Plant Science and Management (2013) 6: 48-59 and references therein). Reconnaissance and early detection should be part of any weed management plan.

Chapter 4, Page 112, Alternative E OHV and vehicle use should be curtailed in native vegetation whenever possible to help minimize the spread of weeds. Vehicles should be cleaned regularly if they are used in native vegetation.

Chapter 4, Page 114, Alternative E. Biological control other than sheep grazing should be implemented. There are good biocontrol organisms for both spotted knapweed and leafy spurge.

Chapter 4, Page 228, Lands with wilderness The Montana Native Plant Society believes that lands with wilderness characteristics should be managed to maintain those characteristics.

Chapter 4, Page 367, ACEC *Eriogonum visheri* is a native plant found only in a small area of the Dakotas and adjacent Montana. The best known population of this plant in Montana is on BLM lands administered by MCFO and in the proposed Powderville ACEC. This globally rare species should be included in the Powderville ACEC as one of the natural resources to be protected. Populations of *E. visheri* should be protected from surface disturbances caused by mining or paleontological research.

SPE-6 *Eriogonum visheri* is a native plant found only in a small area of the Dakotas and adjacent Montana. The best known population of this plant in Montana is on BLM lands administered by MCFO. This globally rare species should be included in the Powderville ACEC and protected from surface disturbances cause by mining or paleontological research.