



27 September 2016

Flathead National Forest
Attn: Plan Revision
650 Wolfpack Way
Kalispell, MT 59901

Dear Flathead National Forest Plan Revision Team,

We are writing on behalf of over 600 members of the Montana Native Plant Society (MNPS) to comment on the draft Flathead National Forest Revised Forest Plan. We are a non-profit organization dedicated to preserving, conserving, and studying Montana's native plants and plant communities, and educating the public about the values of our native flora and its habitats. Our comments are below. Thank you for the opportunity to comment.

Regards,

Kathy Settevendemie

Peter Lesica

President

Conservation Chair

Chapter 2

MNPS applauds the increase in riparian management zones and increased emphasis on vegetation structure and composition (p.17).

Common tansy, tall buttercup and Canada thistle should be added to the list of undesirable non-native species (#12, p.19).

Mapping weed infestations in aquatic systems and along riparian corridors should be an objective (p.19) and/or guideline (p.20). Knowing where the weeds are precedes control.

Riparian management zones also provide critical habitat for dependent plant species such as willows and sedges (p.21).

RMZ guidelines should include prohibiting new road construction within 300 ft of Category 3 wetlands (p.23).

MNPS encourages the protection of uncommon habitat elements because these provide habitat for many rare plant species (05, p.27).

Upward trend for whitebark pine may only be possible with introduction of genotypes resistant to blister rust and with the protection of naturally occurring rust-resistant genotypes, such as those on Big (Whitefish) Mountain (p.27, Table 2).

Western white pine is not included in Table 2; an upward trend in some low-elevation, mesic sites is desirable (p.27).

Table 4 not Table 5 (09, p.29).

MNPS agrees that increasing the proportion of large-size trees is desirable (Table 7, p.32). In many forests, old-growth structure provides habitat for mosses and lichens not found in early successional stands (13, p.33).

Many species of lichens and bryophytes find optimum conditions in old-growth forest, and some species may be restricted to these forests (Table 11, p.35; see Canadian Journal of Botany 69:1745, 1991)

MNPS believes that the forest plan should present specific targets for old growth proportions based on what are thought to be the presettlement range of variation. Such targets will provide a means of determining management success or failure (Table 11, p.35-36; see Biological Conservation 77: 33, 1996).

Downed wood provides habitat for many liverwort species (18, P.37; see Canadian Journal of Botany 69:1745, 1991). Downed wood also provides habitat for pollinators.

MNPS believes that restoration of whitebark pine communities through planting of blister rust-resistant genotypes should be one of the objectives (P.44).

MNPS believes that all vegetation management treatments should be done in a way that minimizes or precludes construction of additional roads (P.44).

Restoration of whitebark pine is an important objective. It should be carried out across the forest, even in designated wilderness (P.49).

Guidelines for protecting plant species of conservation concern should specifically address the control and especially the prevention of noxious weed infestations. Guidelines should also

designate a minimum-size buffer zone around populations of species of conservation concern (P.50).

Guidelines for control of noxious weeds should prohibit boom spraying or other broad-scale herbicide application unless it is followed immediately by effective restoration plantings (P. 57; Biological Conservation. 197: 8, 2016).

Research Natural Areas and Special Botanical Areas should be included in “high priority areas” (Desired conditions, 01, P.57).

Highest priority should also be given to high priority areas listed under desired conditions (Objectives, 01, P.57).

MNPS agrees that timber harvest should be practiced on a sustained-yield basis (P.79).

Desired conditions for timber harvest should include minimizing road construction and closure and restoration of roads that are constructed to help minimize noxious weed infestations (p.80).

It seems that guidelines for timber harvest should include guidelines for replanting and minimizing weed encroachment. How does the F.S. decide what trees to replant? Is western white pine used? How are roads reclaimed (P.82)?

An additional guideline is needed- areas of the forest subject to livestock grazing should be monitored for weed encroachment, and weeds should be controlled as soon as possible after initial detection. (P.89).

Chapter 3

Designated wilderness should be suitable for restoration activities such as weed control, cone collecting and planting of disease-resistant whitebark and western white pine as long as they are consistent with the wilderness characteristics of the areas (P.97).

Ninemile, Shepard Creek, Bowen Creek and Crystal fens were identified by Greenlee (1999) of the Montana Natural Heritage Program as wetlands of high significance. In addition, Abbotts Flats and the Hay Creek Fen were identified as wetlands with high significance, Schnaus Cabin Wetlands, Coal Creek North Fork Floodplain with very high significance, and the Teepee Lake Complex as Outstanding Significance by Jones et al. (2000). Were these considered for special botanical areas? (Table 30, P.106)?

New road construction should be limited in all three classes of general forest. New roads constructed for timber harvest should be reclaimed after treatments are completed to keep the road density stable (P.115, 116).

Chapter 4

The Hungry Horse area is used extensively for huckleberry harvesting (P.124).

The General Overview of the Swan Valley should mention that it has a very high quantity, quality and diversity of wetland plant communities in Montana (P.148).

The many special botanical areas should be mentioned under Unique Characteristics (P.148).

Guidelines for the Swan Valley should include reforesting many of the closed roads to help reduce ORV use and noxious weed invasions.

Appendix A

It is difficult to evaluate the efficacy of the monitoring strategies because very little detail is provided.

Water howellia is notorious for being present one year and absent the next. Annual monitoring of a subset of ponds selected to be representative is necessary (Table A-2).

How will species of concern be monitored? Cover, density, frequency? Quantitative measurements, paired controls and monitoring intensity should be identified as part of monitoring assessments. The type and degree of monitoring should be addressed by the risk associated with the impact. A discussion of risk assessment should also be included; for example what types of projects would be a low impact versus high impact. (Table A-2).

Measuring cover of invasive species has problems because cover can be strongly affected by weather and by the identity of the recorder. In a dry year cover of a perennial weed may decline, but the actual number of plants will remain the same. Frequency may be better (Table A-3, Natural Areas Journal 22:148, 2002).

MNPS believes there should be a monitoring program for a subset of pollinators.

Appendix C

Planting conifers and tall shrubs should be used to decommission new and perhaps some old roads (C-17).

MNPS believes that new roads in areas managed for timber production should be decommissioned and revegetated to discourage ORV use and noxious weed invasion (C-18).

MNPS agrees that areas proposed for vegetation management activities should be evaluated for the presence of occupied or suitable habitat for threatened and endangered plant species (C-19).

MNPS believes that old growth should be preserved and increased across all low-elevation biophysical settings (P.C-21-C-22).

MNPS supports the plan's devotion to retaining and attaining old growth forest (P.C-24-C2-6).

Constructions of new roads should be minimized when salvage harvesting in burned forest (P.C-31).

MNPS agrees that restoration planting of whitebark pine should be done in recommended wilderness (P.C-33).

Control methods for noxious weeds should not include boom spraying or other broad-scale herbicide application unless it is followed immediately by effective restoration plantings (P.C-44; Biological Conservation. 197: 8, 2016).

MNPS believes that only spot spraying of herbicide should be allowed in special botanical areas (C-48).

Quantitative monitoring of grassland condition and the abundance of noxious weeds should be conducted on all grazing allotments (C-51).