



MONTANA NATIVE
PLANT SOCIETY

Observe – Conserve – Educate
P.O. Box 8783 Missoula, MT 59807

27 March 2017

Forest Plan Revision Team
Helena – Lewis and Clark National Forest
2880 Skyway Dr.
Helena, MT 59602

Dear Helena-Lewis & Clark 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. MNPS is 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.

Regards,



Peter Lesica
Conservation Chair

Gretchen Rupp
Vice President

P.20 As stated, it is important to maintain natural disturbance regimes; e.g., flooding.

P.21 Category 4- how is “riparian vegetation” defined? Perhaps a definition based on the standard wetland delineation protocols

P.22 03- having a buffer zone of 600 ft for peatlands as proposed, is desirable.

P.22 Guidelines- natural flood regimes should not be impaired by upstream impoundments or diversions.

P.27 There does not appear to be anything in the Plan dealing with off-road vehicle use. This topic is especially important with regards to vegetation. ORV use damages vegetation, encourages weed invasions and results in soil erosion. Specific information and restrictions may be presented in a forest travel plan. However MNPS believes this subject and general restrictions should be presented in the Forest Plan as well.

P.27 “Natural range of variation” is used throughout the vegetation section, but it is not clear how this is determined; a specific procedure or document should be cited

P.33 06-08, Table 8- MNPS supports management directions that help protect old-growth forests, especially at lower elevations.

P.36 Standard 01- MNPS supports the restoration of old growth forests, especially at lower elevations. Guidelines 02- MNPS supports the restoration of old growth forests, especially at lower elevations.

P.38 02- smooth brome is invasive in some areas of Canada and northeastern Montana. Stands of smooth brome are usually near-monocultures. These stands should be restored to more diverse native vegetation when possible.

P.40 Objective 01- MNPS discourages the use of broad-scale herbicide application

P.40 Guideline 01- MNPS discourages the use of non-native species for restoration. Many non-native species were considered benign at first but eventually became invasive.

P.40 Shouldn't there be a guideline for prescribed fire use in grassland-shrubland management?

P.41 A second goal should be locating and then protecting additional populations of at-risk species within the plan area. A third goal should be to establish long-term monitoring of at-risk populations.

P.43 Guidelines- MNPS believes that broad-scale (e.g., boom or aerial spraying) should only be used if effective restoration actions follow promptly. Studies have demonstrated that broad-scale herbicide application usually results in subsequent invasion of the same or different weed species unless successful planting of native species occurs shortly after herbicide.

P.82 Guidelines- livestock grazing should be managed in a manner that prevents noxious weeds from being spread from an area of infestation into other non-infested areas. This could mean electric fencing of infestations or temporary closures of allotments until after weed control.