



Montana
Native
Plant
Society

To observe - conserve - educate

P.O. Box 8783 Missoula, MT 59807

30 March 2006

Monument RMP Team
BLM Lewistown Office
P.O. Box 1160
Lewistown, MT 59457

Dear Upper Missouri River Breaks Monument RMP Team,

We are writing on behalf of the more than 600 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 appreciate having this opportunity to comment on the draft resource management plan (DRMP) for the Missouri River Breaks National Monument.

We believe that the preferred alternative (F) adequately provides for protection of sensitive plant species. However, the EIS fails to mention *Mimulus ringens*, a species of concern, in Montana known only from 8 miles below Virgelle. MNPS agrees that establishing resource reserve grazing allotments (grass banks) whenever possible is a good idea because this will help prevent overgrazing during periods of drought. Wetland and riparian areas provide important but relatively rare habitat on the Monument. MNPS believes that surface disturbance should be prohibited within 1/4 mile of wetland and riparian areas as prescribed in Alternatives D and E. We also believe that the Alternative F outlines a sensible approach to managing fire on the Monument. Fire is a natural process in the semi-arid steppe vegetation. MNPS strongly opposes creating roads and bulldozing fire lines in native vegetation unless it is absolutely necessary to protect lives or property. MNPS agrees that non-native vegetation should be restored whenever possible, but we oppose using invasive exotics, such as crested wheatgrass (*Agropyron cristatum*), smooth brome (*Bromus inermis*) or sweetclover (*Melilotus* spp.).

MNPS believes that the DRMP fails to adequately acknowledge the threat of invasive exotic plants to the biological resources of the Monument. Mike Dombeck, former chief of the Forest Service wrote, "The problem of noxious weeds and nonnative invasive species threatens every aspect of ecosystem health and productivity, in forests and on rangelands, on public and on private lands. The increasingly devastating effects include reducing biological diversity, impacting threatened and endangered species and wildlife habitat, modifying vegetative seral stages, changing fire and nutrient cycles, and degrading soil structure." Protocols for preventing weed invasions should be incorporated into the preferred alternative. Specifically, we believe

that roads and oil and gas development provide habitat for invasive exotics. Roads should be closed to the public whenever possible. Allowing road travel by local ranchers who work there is not nearly as much of a threat because they are less likely to have seeds of exotic species than visitors from elsewhere. We also advise not bringing in foreign road materials, especially from sources in proximity to weed infestations. Native plant cover should be restored or retained along the edges of roads being built or maintained. The native vegetation at oil and gas sites must be restored after they are no longer in use, and all sites should be monitored for weeds during and after use. We encourage minimizing the number of disturbed sites by drilling multiple wells from one location whenever possible. Finally, the DRMP makes little mention of monitoring as a preventative weed-control strategy. MNPS encourages BLM conduct annual monitoring of all roads and recreation sites for new weed infestations. Over the long term this will be a cost-effective strategy. Thank you for considering our comments.

Sincerely,

Susan Winslow
President

Peter Lesica
Conservation Chair