

**Montana  
Native  
Plant  
Society**

*To observe - conserve - educate*

P.O. Box 8783 Missoula, MT 59807

22 January 2014

Ms. Deb O'Neill  
Montana Fish, Wildlife & Parks  
P.O. Box 200701  
Helena, MT 59620-0701

Dear Ms. O'Neill

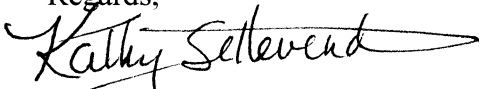
We are writing on behalf of the 600 members of the Montana Native Plant Society (MNPS). We are an organization dedicated to preserving, conserving and studying the flora of Montana and educating the public on the values of the native flora and its habitats. We are writing to comment on the draft 2014 Montana State Wildlife Management Plan (SWAP).

The plan provides management guidelines at two levels of organization: communities and species. Protection of plant communities and the animals they support at this landscape scale is a reasonable approach. We have one suggestion. The Montane Grasslands section does not differentiate grasslands east and west of the Continental Divide. Both are dominated by bunchgrasses; however, grasslands west of the Divide did not evolve with large herds of ungulates that grazed during the growing season, while those east of the Divide evolved with bison. This means that grasslands of the Bitterroot, Missoula, Blackfoot, Mission, Flathead and Tobacco valleys are easily degraded by spring and summer grazing of even moderate intensity (see R. N. Mack and J. N. Thompson 1982. *Evolution in Steppe with Few Large, Hooved Mammals. American Naturalist* 119: 757-773). Most of these grasslands have lost most of their large, native bunchgrass cover and are invaded by noxious weeds. Pastures that have been used primarily for winter grazing are often still in good condition. The plan should point out the distinction between grasslands east and west of the Divide and should recommend winter grazing for moderate- and good-condition pastures.

Unfortunately we believe that the SWAP falls short at the species level by not including plants. The Executive Summary states that "This SWAP is not meant to be an FWP plan, but a plan to guide conservation in Montana for the next 10 years." The Introduction states that the SWAP is "a document that provides conservation direction for the next 10 years in Montana." We believe that a plan that attempts to guide statewide conservation must at the very least address globally rare plants that are deemed threatened or endangered. Insects and other invertebrates are not included in the main body of the SWAP, but they are included in Appendix O. Rare plants frequently provide habitat for rare invertebrates. We suggest that the SWAP devote an appendix to threatened G1 and G2 plant species similar to that devoted to invertebrates. This information is available from the Montana Natural Heritage Program.

Thank you for considering our suggestions. We look forward to an improved plan following the comment period.

Regards,

  
Kathy Settevendemie  
President

  
Peter Lesica  
Conservation Chair