



Montana
Native
Plant
Society

To observe - conserve - educate

P.O. Box 8783 Missoula, MT 59807

27 April 2015

Flathead National Forest
Flathead Plan Revision
650 Wolf Pack Way
Kalispell, Montana 59901

Dear Plan Revision Team,

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 proposed action for the revised forest plan for Flathead National Forest.

We appreciate the emphasis on ecological sustainability and the realization that old growth forest should be protected and the development of new old growth should be promoted. We are happy to see that populations of *Howellia aquatilis* will continue to be protected in a competent manner. We appreciate your commitment to plant species of conservation concern and that you have given consideration to the conservation of native pollinators. We strongly support the designation of the many new Special Botanical Areas.

P.21-22. Desired conditions for wetlands should include protecting wetlands by prohibiting or limiting timber harvest, road construction and other disturbances in the watershed that can adversely alter hydrology.

P.22. Desired conditions for riparian habitat conservation areas states that RHCAs will provide for healthy desired non-native plant communities. We do not believe that there are any desirable non-native, riparian plant communities. All riparian plant communities should be dominated by native species.

P.24. Desired conditions for aquatic habitat provide conditions that support desirable, non-native aquatic communities. We do not believe that there are any desirable non-native, aquatic plant communities. All aquatic plant communities should be dominated by native species. The majority of the non-native aquatic plant species are listed as noxious weeds.

P.24. Desired conditions for aquatic species states that habitat contributes to the support of self-sustaining populations of native and desired non-native aquatic plants (p.24). We do not believe that providing habitat for non-native aquatic plants should be a desired condition.

P.24-25. Desired conditions for aquatic species includes mention of improving habitat for bull trout, westslope cutthroat, loons and boreal toads. Shouldn't it also include maintaining or improving habitat for *Howellia aquatilis*?

P.43. We believe that standards for forest management (timber harvest) should include eradication or control of noxious weeds in management areas.

P.82. MNPS believes that livestock grazing is inappropriate in forest habitats and allotments with significant forest cover and should be terminated as soon as possible. We also believe that native low-elevation intermontane grasslands should not be subject to heavy livestock grazing during the growing season because these systems have not evolved with significant grazing pressure. Native grassland allotments should be subject only to mild grazing or discontinued when possible.

P.86. "Endemic species" is used under desired conditions. Does this refer to all species that are endemic to these wilderness areas; i.e., all native plants and animals found in these wilderness areas?

P.97. Hydrology of special botanical areas should be protected by restricting timber harvest or road building when necessary. MNPS is concerned about the possible use of snowmobiles because snowmobiles can affect the hydrology by compacting snow and can cause pollution and increased concentrations of ammonium, sulfate, and hydrocarbon compounds (U.S. Geological Service 1999. Effects of Snowmobile Use on Snowpack Chemistry in Yellowstone National Park. Water-Resources Investigations Report 99-4148).

P.H-1. It is not clear what "focal species" are.

P.H-3. MNPS believes that plant species of conservation concern should be included as indicators in the Flathead NF proposed plan monitoring program.

P.H-5. Restore whitebark pine and white pine- There is no good strategy to monitor whether restoration of whitebark pine and white pine is working. The Forest Service needs to monitor how successful the treatments have been not simply how many acres have been treated.

Thank you for this opportunity to comment.

Kathy Settevendemie
President

Peter Lesica
Conservation Chair