



Montana
Native
Plant
Society

To observe - conserve - educate

P.O. Box 8783 Missoula, MT 59807

5 April 2003

USDA Forest Service Planning Rule
Content Analysis Team
P.O. Box 8359
Missoula, MT 59807

Dear USDA Forest Service Analysis Team:

We are writing on behalf of over 400 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 changes to the National Forest System Land and Resource Management Planning Rule (36 CFR Part 219). We are concerned about one aspect of the proposed rules: there will no longer be a firm mandate to protect biological diversity on national forests

The proposed rule changes present two options for analyzing and protecting the ecological components of sustainability: a more species-oriented approach and a more landscape-level approach. These correspond to the fine-filter and coarse-filter approaches in conservation biology. The rule changes propose to do one or the other, but most conservation scientists would say that both are needed. The fine-filter approach is aimed at protecting rare or endangered species but can fail to protect more common habitats and large-scale ecosystem functioning. The coarse-filter approach will protect most species (including difficult-to-inventory species) and their habitats but will allow some specialized rare species to "fall through the cracks." Many rare plants are habitat specialists and could suffer under the coarse-filter approach. Other less-well-studied plants like lichens and mosses could suffer under the fine-filter approach. MNPS urges you to adopt rules that will result in healthy populations of all plants on national forest lands.

Sincerely,

Elizabeth Kuropat
President

Peter Lesica
Conservation Chair