



MONTANA NATIVE
PLANT SOCIETY

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

4 October 2018

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 EIS for the Helena-Lewis & Clark National Forest management 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
President

3.5 Aquatic Ecosystems

MNPS agrees that the Pacfish/Infish Biological Opinion (PIBO) monitoring program should be continued. We hope that monitoring protocols for wetlands will be developed and implemented because many rare plants occur in wetland habitats such as fens, marshes and springs.

Forest-wide RMZs should include protection for wetlands as well as lakes and natural ponds. Wetlands seem to get short shrift compared to riparian areas in the DEIS. This is unfortunate because fens and marshes provide habitat for many rare vascular plants and mosses as well as invertebrates.

Livestock grazing should be minimized in riparian areas and around wetlands.

Herbicide treatment of noxious weeds should be limited to spot spraying. Broadcast spraying should not be allowed.

3.8 Terrestrial vegetation

Livestock grazing in grasslands or shrublands that have noxious weeds should be avoided because grazing will often result in the spread of these weeds.

Existing old-growth forests should be protected, and the area of old growth should be allowed to increase because many species of vascular plants and mosses occur only in these habitats. Prescribed fire may be a reasonable approach to managing old growth in some situations.

Salvage harvest is a reasonable activity if it can be accomplished with minimal disturbance. Construction of new roads causes disturbance that allows introduction of weeds. In many cases it takes decades for roads to return to their pre-construction condition.

Elymus innovatus is misspelled.

Hydrology of peatlands often depends on shallow ground water which is affected by surrounding upland vegetation. Depending on local geology, peatland hydrology could easily be affected by extensive road building and timber harvest more than 100 meters away. The threats to peatlands include those listed for wetlands and riparian areas.

Perhaps the most significant threat to grasslands and associated rare plants is exotic weed invasions, which are often associated with livestock and off-road vehicle use. Equally threatening is the broad-scale application of herbicide to control noxious weeds. Herbicide should be spot-applied in most cases. broad-scale application must be followed by seeding with native species or other restoration actions.

Monitoring is one strategy in Appendix C of the draft plan. Monitoring population trends of rare plants is essential for adaptive management. It may be best accomplished with permanent, randomly-selected plots that are visited on a regular basis. The section on monitoring of plant species at risk in the draft plan should have more detail. For example, “number of stems” can be highly variable among years because for some species stems are only produced for reproduction and is therefore often a poor indicator of trend in the number of individuals. Monitoring every five years will work for some species. However, some species such as orchids display prolonged dormancy; these species need to be monitored by mapping for three consecutive years to obtain a baseline because some plants can stay beneath the ground for one or two consecutive years. Monitoring plans should be developed for each plant species at risk; one plan for all will not work.

Rare plant species are well protected from motorized use, noxious weeds, etc. within recommended wilderness areas. The presence of rare plants should be considered when choosing which RWAs to designate.

Removal of noxious weeds often just prompts reinvasion of the same species or invasion by a different noxious weed because removal creates open, disturbed soil. Restoration planting should be part of all major weed treatment projects in order to help curb subsequent invasions.

Administratively Designated Areas

Botanical Special Areas should be included in this list.

MNPS recommends the Green Timber Basin/Beaver Creek/Sawmill Flat area for designation as a Botanical Special Area. The area supports large populations of two rare orchids, *Amerorchis rotundifolia* and *Cypripedium passerinum*. The areas have been thoroughly surveyed, but the exact boundary delineation would have to be determined by planners.