MONTANA NATIVE
PLANT SOCIETY
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9 August 2019

Bureau of Land Management
Missoula RMP
3255 Fort Missoula Road
Missoula, MT 59804

Dear BLM Missoula Field Office RMP Team,

Thank you for the opportunity to comment on the Draft Resource Management Plan for western Montana. We are writing on behalf of over 700 members of the Montana Native Plant Society (MNPS). The Society 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, organized by topic, are below.

2.3 Aquatic Habitats. Although wetland and riparian areas compose a small portion of the western Montana landscapes, they support many plant and animal species are not found in upland communities. MNPS believes that these special habitats should be protected from overgrazing, timber harvest and weed invasions.

2.3 Forest Vegetation and Special Status Plant Species. MNPS agrees that forests should be managed in a way that provides habitat for all native species. This entails having a natural range of successional stages. MNPS believes that this implies protecting low- and mid-elevation old growth forests.

MNPS agrees that whitebark pine habitats should be restored with blister rust-resistant strains of the tree.

MNPS believe that other vascular plants should also be protected on BLM lands in western Montana even though they are not listed as sensitive on the state BLM list. Keeled bladderpod (*Physaria carinata*) is known from Idaho and Wyoming and fewer than a dozen populations in southwest Montana, many on lands managed by BLM. There is evidence that some BLM populations are declining according to the Montana Natural Heritage Program. At least some populations of this species should be protected.

2.3 Noxious and Invasive Plant Species. MNPS agrees that early detection is critical. All BLM field people should be trained to identify even small populations of noxious weeds. Broadcast spraying of herbicides should be avoided because it often results in continued weed invasion. Spot spraying and

biological control should be prioritized. Planting of native species should follow soon after weed control efforts; otherwise the same or different weeds will return to the open soil created by control efforts. Monitoring the results of weed management should be a priority.

2.3 Grassland and Shrubland Vegetation. A large proportion of grasslands in western Montana have been degraded by livestock grazing, weed invasions and fire suppression. All grazing leases should be monitored for grassland condition; i.e., productivity of long-lived bunchgrasses and diversity of native forbs. Lease terms should be changed if a negative trend is observed.

2.3 Soil, Water, and Riparian-Wetlands-*Riparian*. MNPS agrees that the condition of riparian areas should be monitored to ascertain whether livestock grazing should be curtailed or allowed to continue.

2.3 Livestock Grazing. MNPS believes that livestock grazing should be conducted in a manner that is sustainable and allows for native biological diversity. Monitoring is required, and downward trends may require changes to animal unit months (AUMs), season of use, rest rotations, or removal of cattle from a portion or all of the allotment for a period of time.

<u>Alternative B versus Alternative C (2.4, 2.5)</u>

Forest Management. MNPS believes that prescribed fire, thinning and even harvest have a place in forest management. However, many of these treatments might require road construction and could result in weed invasions, both of which should be avoided. New roads should be decommissioned after use and restored to undisturbed condition. Old growth forest conditions should be protected wherever they occur. This includes protecting snags and coarse woody debris. Although Alternative B and C are similar, Alternative C obtains these goals better than Alternative B because it includes decommissioning roads after projects are finished.

Noxious and invasive species. Early detection is critical. All BLM field people should be trained to identify even small populations of noxious weeds. Broadcast spraying of herbicides should be avoided. Spot spraying and biological control should be prioritized. Planting of native species should follow soon after weed control efforts; otherwise the same or different weeds will return to the open soil created by control efforts. Monitoring the results of weed management should be a priority. Preventative treatment along roads and in areas disturbed by management activities should be prioritized for early detection and treatment. Alternative B obtains these goals better than Alternative C because there are more proposed treatments.

Soil, Water, and Riparian Resources. The condition of riparian areas should be monitored to ascertain whether livestock grazing should be curtailed or allowed to continue. Although wetland and riparian areas compose a small portion of the western Montana landscapes, they support many plant and animal species are not found in upland communities. MNPS believes that these special habitats should be protected from overgrazing, timber harvest and weed invasions. Alternative C appears to

address this issue better than Alternative B because it provides for assessment activities which will help to prioritize projects.

Livestock grazing. MNPS believes that livestock grazing should be conducted in a manner that is sustainable and allows for native biological diversity. Monitoring is required, and downward trends may require changes to animal unit months (AUMs), season of use, rest rotations, or removal of cattle from a portion or all of the allotment for a period of time. Alternative C appears to address this issue better than Alternative B because it provides specifics such as rest periods and stubble height.

Special Designations and Lands with Wilderness Characteristics. Rattler Gulch and West Fork Buttes areas both contain populations of *Physaria carinata*. Both of these areas should be given ACEC status to protect the habitat of this globally rare species.

Chamberlain Meadows is a large wetland complex with diverse vegetation and relatively little disturbance. It is the only known location in Montana for the moss, *Pseudoleskeella arizonae*. It would be best if it became part of a wilderness study area. Otherwise designation as an ACEC would provide some needed protection.

Thank you for considering our comments, and for your good work conserving these special landscapes.

Sincerely yours,

Gretchen Rupp, President

Peter Lesica, Chair - Conservation Committee