



MONTANA NATIVE
PLANT SOCIETY

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

22 September 2020

Mark Foster
Shoshone National Forest All Units
808 Meadow Lane Avenue ,
Cody, WY, 82414

Dear Mr. Foster,

Thank you for the opportunity to comment on the preliminary environmental assessment for the Shoshone National Forest Travel Management Plan. 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. Although Shoshone National Forest is in Wyoming, we are concerned about the Line Creek Plateau Research Natural Area (RNA) that straddles the state boundary between Wyoming and Montana.

The Forest Service established the RNA Program in order to have a system of pristine areas representative of habitats across Forest Service lands. They are intended to serve as baseline or reference areas to monitor changes that occur as a result of land management prescriptions. RNAs are managed to maintain the natural features for which they were established, and to maintain natural processes (<https://www.fs.usda.gov/rmrs/research-natural-areas>). The Line Creek Plateau RNA was delineated across the Wyoming/Montana border because it is the easternmost alpine area of the Beartooth Mountain Range and supports plants and plant communities found nowhere else in the Northern Rocky Mountains. *Salix barrattiana*, *Kobresia macrocarpa*, *Senecio amplexans* and *Eriophorum callitrix* are four arctic-alpine species found nowhere else in the Beartooth Range, and the latter three species nowhere else in Montana. Viability of plants and animals and successional processes on one side of the state line depend on the habitat across the entire RNA.

MNPS believes that allowing snowmobile use on the Line Creek Plateau RNA will greatly reduce its value as a reference area for some of the richest and most diverse alpine habitat in the Northern Rocky Mountains. In addition snowmobile use may harm populations of rare plants and plant communities that occur there by altering snow melt by compaction and through gasoline and exhaust pollution. Noise pollution could also cause changes in the behavior of resident animals that interact with the plants. MNPS opposes allowing any snowmobile use in the Line Creek Plateau RNA. Thanks you for considering our concerns.

Regards,

Peter Lesica & Elizabeth Bergstrom
Montana Native Plant Society Conservation chairpersons