March 27, 2024

Lolo National Forest Supervisor's Office
Attn: Amanda Milburn - Lolo Plan Revision
24 Fort Missoula Rd
Missoula, MT 59804
SM.FS.LFNRevision@usda.gov

Citizens for a Weed Free Future
Preserving Native Vegetation. Restoring Habitat.

Dear Ms. Milburn;

Thank you for the opportunity to comment on the Lolo National Forest Revised Plan Proposed Action.

Citizens for a Weed Free Future (CWFF) is a non-profit organization dedicated to the prevention, control, suppression, and eradication of noxious weeds in Western Montana. We formed in 1999, at the prompting Missoula community leaders and the then Lolo National Forest Supervisor to promote and facilitate effective weed management in Missoula County. CWFF developed and got the June 2000 Missoula County mil levy passed which tripled the Missoula County Weed District budget and transformed them into the best funded, best staffed and most progressive weed district in Montana. Since then, we have transitioned into a fund granting organization that cost shares for on the ground weed control with private and public land managers in Western Montana. We have also worked closely with the Lolo NF over the years and provided project specific funding to treat noxious weeds on the LNF and neighboring lands. Our Board of Directors includes three former Program Managers for the Lolo NF Noxious Weed Program in addition to a rancher and a private land manager/developer. Between our Directors we have over 100 years of on the ground public and private land weed management experience.

In summary, the suggested 2,000 acres of treatment on PA page 31 is very low considering how many other ecosystems and ecosystem services rely on the prevention and treatment of invasive species. As the climate changes and the Lolo NF increases its desired conditions, you will need to increase your active management acres.

CWFF feels that the 2,000 acres is a simple number pulled from the national database (FACTS) from the past years. The Lolo can do better, and as it is stated in numerous sections of the proposed action invasive species management is very important to preserving and protecting resources. We believe the Lolo can and should maintain or improve the existing condition to fulfill the desired conditions.

For example, under acquired lands it is stated 3,000 acres of plant inventory and treatments will be conducted every year. That exceeds the 2,000 acres listed for the first objective for invasive species (FW-INV-OBJ 01). Maybe a clarification could be made to say, "in addition to meeting the invasive species objects of all the other resource areas, the LNF will treat, inventory and monitor an additional 2,000 acres for maintenance of past treatments". However, that acre number is still too low.

We also recommend the addition of desired conditions and an active and effective Early Detection, Rapid Response (EDRR) plan and an Integrated Pest Management (IPM) framework to best serve the LNF in your fight against invasive species.

Specific comments are as follows:

PA pg 19 Forestwide Roles and Contributions: Objective 1:

Comment: Grouping activities such as timber harvest, planned ignitions, thinning, **invasive species** management, and planting on a minimum of 20,000 acres is so broad a grouping of vegetation management treatments as to be meaningless in relation to the annual Objective for invasive species treatment.

Recommendation: have a separate Forestwide Objective for annual TERRESTRIAL invasive PLANT species treatments so we can have some idea of how much you intend to accomplish each year for invasive species, e.g invasive and noxious weed, treatments.

PA pg 31 Objectives (FW-INV-OBJ) 01

Invasive plant management actions are implemented annually on 2,000 acres, measured as an annual average on a decadal basis, to reduce invasive plant cover, infestation size, and/or occurrences, and to maintain and protect un-infested areas.

Comment: This is a low number of acres to treat annually based on how many desired conditions/objects require invasive species management. This objective only includes plant management.

Recommendation: Increase the acres to account for other treated acres suggested in the plan (for example acquired land restorations has 3,000 acres of treatment). Include acres for inventory and monitoring. Include a maintenance treatment plan of acres already treated. Include an objective for other taxa, likely not acre based.

PA Throughout:

Comment: The Desired Conditions for invasive plants are so vague and soft so to have no management impact. E.g. what does "minimal invasive plant species" mean on page 89?

PA pg 32 Guidelines (FW-INV-GDL) 03

To minimize the impacts to the untrammeled quality of wilderness, treatment of nonnative invasive plant species should use integrated pest management principles.

Recommendation: ALL invasive plant treatments should use integrated pest management principles, not just those in Wilderness. Wilderness areas should include an early detection, rapid response (EDRR) framework to ensure no invasive species are established to avoid trammeling activities in the future.

PA pg 46 Standards (FW-WRISK-STD)04 Bullet 3:

Appropriate measures to prevent turnout of sick or diseased domestic sheep and goats on grazing allotments, on trailing routes, or in invasive plant management situations. Sick or diseased animals shall be removed as soon as possible after their recognition.

Comment: Does the LNF even have any sheep or goat grazing permits? If not delete this Standard.

PA pg 95 Objectives (FW-ALR-OBJ) Item 04

Over the life of the plan, accomplish 3,000 acres of invasive plant inventory and treatments.

Comment: Conservatively assuming the revised LNF Plan will be in force for at least 25 years, 3,000 acres total of inventory AND treatments is only 120 acres / year out of over 2MM acres of LNF land. This is virtually nothing in terms of management activity and weed management.

PA Pg 146: 3.7.10 Plan Components: Nonforested Vegetation (VEGN)

Desired Conditions (RC-VEGN-DC) 01 Open grasslands in the Rock Creek area support low fuel levels, are absent of invasive plant species and Douglas-fir encroachment, are resilient to fire, and provide native species habitat.

Comment: Open grasslands of Rock Creek currently have large acres of invasive plant species some of which are highly flammable and would be considered fuels (e.g., cheatgrass). Most of these areas have never been "officially" inventoried and so the presence of invasive plant species is not captured in the database.

Recommendation: Complete actual on the ground surveys to ensure accurate treatment acre objectives can be captured in the plan.

Pg 152 4.1 MA 1: Designated Wilderness (MA1)

Desired Condition 09: *Non-infested areas remain free of invasive species. Where invasive species occur, their range is reduced where possible, or at a minimum, they do not expand and they do not disrupt ecological functions. Invasive plant introduction through recreational use is prevented.*

Comment: Need to map weed-free areas first in order to maintain.

Recommendation: Inventory and map the designated Wilderness areas for invasive plant species (should consider for other taxa too) and develop a EDRR framework to eradicate invasive plant species upon detection.

Appendix 3: Pot. Management Approaches Possible Actions

3.1.6 Invasive Species (INV)

Comment: Rather than rely on mitigation and treatment after weeds establish, why not "Treat invasive and noxious weed prevention with the same emphasis as is currently placed on fuels, fire management and timber management." Treatments for out-year projects should begin as soon as they are identified as a potential project area.

"Prioritize noxious weed species listed by the State of Montana for integrated pest management. Some Montana counties have additional species listed as noxious on their websites."

Comment: Add invasive species that are specific or of significant threat to the LNF in addition to the State list.

"Use protection measures outlined in applicable weed management decisions or subsequent weed management decisions."

Comment: What happened to and why not use and expand on the existing LNF Forest wide weed mitigation and prevention measures?

We submit the table below on pages 5 to 11 to help you determine a new number for treatment acres and that the corrected plan will include a number that better represents acres stated throughout the plan.

Thank you for the opportunity to comment.

Sincerely,

Dusty Deschamps

Dusty Deschamps, President
Citizens for a Weed Free Future

CWFF Recommendations in bold/italicized below

Topic	Noxious weed / Native Veg Conducive Disturbance	Direct Invasive species management	Page	Acres per Unit	Time frame	Recommended Additional Acres estimates	Guideline conflict
Forest Veg		Forested vegetation - obj 01	19	20,000 acres	decade average	***0-20,000 to match forest vegetation mgt objectives***	FW-INV-GDL 01, FW-INV_OBJ 01
Connectivity	soil disturbance during stream connectivity restoration		27	3 miles	every 5 years	***15 acres***	FW-INV-GDL 01, FW-INV_OBJ 01
Connectivity	remove or upgrade stream crossing structures		28	20 AOPs	every 5 years	***1 to 4 acres***	FW-INV-GDL 01, FW-INV_OBJ 01
FFW		FFW- OBJ 01	30	220,000	first 10 years	***0-2,000 acres to match FFW objectives***	FW-INV-GDL 01, FW-INV_OBJ 01
INV		***Need to include objectives for all taxa***	31				
FW_INV-DC	Include EDRR framework	***prevent new invasive plant species from becoming established in terrestrial or aquatic plant communities on the forest using an early detection, rapid response framework.***	31				

FW-INV-DC	Include an IPM framework based off the LNF Integrated Weed Management Plan FEIS but also include other taxa.	***Invasive plant species are controlled with integrate pest management (IPM) approaches in a strategic and adaptive manner. The IPM approaches include effective prevention and education program, combined with mechanical, biological, cultural, and chemical methods of invasive species control. The adaptive management approach is outline and should be included by reference from the 2007 Lolo NF Integrated Weed Management FEIS.***	31				

FW-INV-OBJ	Need to increase implemented annual acres from 2,000 acres to cover all the other topic areas desired conditions/goals/objectives	***or add "In addition to the acres treated for other resource areas/ecosystems"***	31				
FW-INV-GDL 02		***Need to keep terminology consistent (replace non-native with invasive); change "boats" to watercraft to include all watercraft; need to include the word treatment in one of the guidelines.***	32				FW-INV-GDL 01, FW-INV_OBJ 01
WTR	restoration work in the CWN, WCF		34	4000	every 5 years	***800 acres***	FW-INV-GDL 01, FW-INV_OBJ 01
RMZ	restoration work in the RMZ		36			***100-200 acres***	FW-INV-GDL 01, FW-INV_OBJ 01
SDIV		***Need to add invasive species management in order to protect species diversity***	41				FW-INV-GDL 01, FW-INV_OBJ 01

SES		***Need to add invasive species management to Desired Conditions/Goals. Invasive species threaten all Ecosystem Services.***	48				FW-INV-GDL 01, FW-INV_OBJ 01
CC		***Invasive species, especially annual invasive grasses and insects/disease are expected to increase due to climate change altering ecosystems and biomes. The Lolo need to acknowledge this as well under climate change and include invasive species management as a mitigation.***	50				FW-INV-GDL 01, FW-INV_OBJ 01

RNA		***Elk Meadows (Seeley RD) and Mary's Frog Pond (Missoula RD) need to be added as was intended since their establishment as a Botanical area of interest. This should be well documented in the 2006 revision. Noxious weed management should be included to preserve the ecological processes of all the RNAs listed and forgotten (missing "Squaw Cr IRA, sure it's called something else) since all their establishments are vegetation based.***	81-82				FW-INV-GDL 01, FW-INV_OBJ 01

IRA		***Include invasive species management as a goal/desired condition for the IRAs. An Early Detection/Rapid Response program should be designed to protect the important wildlife habitat the IRAs preserve.***	85	756,068	EDRR every couple years	***1000 acres***	FW-INV-GDL 01, FW-INV_OBJ 01
SA		***If decide not to elevate the protection of these areas to RNAs, still need to include invasive species management to protect their ecological integrity***	89	675	EDRR every couple years	***39-460 acres***	FW-INV-GDL 01, FW-INV_OBJ 01
ALR		***The plan graciously includes 3,000 acres of invasive plant inventory and treatments. It will take 61 years to inventory and treat the 184,447 acres. Suggest increasing these acres.***	94-95	3000	year	***need to increase substantially to at least 6,000 / year to cover a Forest Plan life of approx. 20-30 years***	FW-INV-GDL 01, FW-INV_OBJ 01

GRAZ		***Need to include noxious weed management for grazing allotments so it can be included in the allotment management plans and annual operation plants. Need to list all grazing allotments by acres and cow/calf pairs. The Lolo has several allotments that need to go under environmental review.***	102-104	200,000	yearly	***Include a % of allotment in AOPs. There isn't even a list of the grazing allotments on the LNF in the Proposed Action, but there should be.***	FW-INV-GDL 01, FW-INV_OBJ 01