

Data Submitted (UTC 11): 8/14/2022 7:40:26 PM

First name: Peter

Last name: Lesica

Organization: Montana Native Plant Society

Title: Conservation Chair emeritus

Comments: Thank you for the opportunity to comment on the scoping package for the The Douglas Hill Off Highway Vehicle (OHV) Area and dispersed campground. We are writing on behalf of over 900 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.

Douglas bladderpod (*Physaria douglasii*) is a small plant native to northeast Washington, adjacent British Columbia and southwest Alberta. A single population of Douglas bladderpod also occurs on the northern margins of Lake Koocanusa in Lincoln Co., Montana. Although there is a small subpopulation along the west shore of Lake Koocanusa, the majority of the Montana plants are found in the Douglas Hill OHV Area in very sandy soil along the edge of the forested areas close to the shore of the reservoir (see attached maps). Peripheral populations are often genetically and morphologically divergent from central populations, and long-term conservation of species is likely to depend upon the protection of genetically distinct populations (see Lesica and Allendorf, *Conservation Biology* 9:753, 1995). Furthermore this is the only known population of Douglas bladderpod in our state. The Montana Native Plant Society supports conservation of Montana's only population of Douglas bladderpod.

The Montana Native Plant Society urges Kootenai National Forest to do all that it can to protect Douglas bladderpod on their lands. MNPS supports the proposal to withdraw the area both north and south of Road 254A from off-road travel. We also urge KNF to withdraw the area of bladderpod habitat northwest of this proposed withdrawal from both OHV use and camping to help protect a large portion of the population (see Map 1 for our suggested withdrawal boundary). If it is not possible to completely close this area, perhaps it would be possible to have one or two designated routes through this bladderpod-occupied area between the forested area and the beach. In addition, MNPS suggests that select areas within the bladderpod-occupied closed area be monitored for disturbance. This could be accomplished using permanently monumented photopoints. MNPS would be willing to help with this effort.

Regards,

Patrick PlantenbergElizabeth BergstromPeter Lesica