

Data Submitted (UTC 11): 4/1/2024 7:11:11 PM

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Organization:

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Comments: To the Lolo NF Plan Revision Team,

Thank you for the opportunity to comment on the Proposed Action. I have the following comments:

1. I strongly support the expansion of the Carlton Ridge Research Natural Area to include all of section 23 (T11N, R21W) on the Lolo National Forest. This expansion, which was proposed during earlier plan revision work in 2005, is critical because this section includes the majority of the alpine larch forest on the ridge, and it also includes an important subalpine wetland with a diversity of wetland-obligate plant species. While this stand was impacted by the Lolo Peak Fire, expansion of the RNA will protect this ecologically unique area in perpetuity and provide opportunities for study of post-fire recovery in this forest type. Such studies are already underway in cooperation with the Rocky Mountain Research Station and addition of this section to the RNA will include several established monitoring plots. Dendrochronology field research has also occurred both in the currently established RNA and in the stand in section 23 for a study of burned area extent in the northern Rockies (Knapp and Soule 2011, upload attached), further underscoring the importance of the expansion area to forest ecology and fire history research.

2. For proposed and possible actions for at-risk plant species, a regional botany field survey protocol is available that should be incorporated by reference. This protocol, which was approved and distributed by Regional Forester Leanne Marten in 2020, outlines methods for pre-field review, risk assessment, and field surveys for at-risk plant species. It pertains to the actions identified in Appendix 3, section 3.2.2, page A3-20, and specifically bullet #3 in this section. The signed letter and protocol are attached and should be referenced in this section.

3. While the initial species at risk process was completed earlier, there are at least three additional plant species that should be reconsidered for SCC designation. These are *Cypripedium fasciculatum* (clustered lady's-slipper), *Mimulus clivicola* (monkeyflower), and *Carex rostrata* (a sedge). The first two species were previously designated as R1 sensitive species, occur in habitats that are frequently included in prescribed fire and silviculture treatment areas, and could be adversely affected by those management actions. *Carex rostrata* is extremely rare on the Lolo National Forest and in Montana; fewer than five populations are known in the state and they are restricted to peatland (fen) habitats. While fens will likely be covered by plan components (and rightly so), this species warrants SCC designation by virtue of its extreme rarity on the Lolo NF (one known population; such rarity in a plan area is one of the risk factors identified in the planning directives criteria for SCC designation). Extensive surveys in fens over the last 25+ years in western Montana have not detected any additional populations. Further comments on changes to the plant SCC list will likely be submitted and the planning directives allow for changes to this list, by the Regional Forester, at any time.

Thank you again for the opportunity to comment on the Proposed Action.

Steve Shelly

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