

Data Submitted (UTC 11): 4/8/2024 2:31:13 AM

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Organization: Montana Native Plant Society - Clark Fork chapter

Title: President

Comments: Dear Lolo National Forest Plan Revision Team,

We are writing on behalf of over 900 members of the Montana Native Plant Society (MNPS) to provide suggestions for the scoping for the draft Lolo National Forest Revised Forest Plan. MNPS 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 scoping comments are below.

Regards,

Teagan Hayes

President, Montana Native Plant Society Clark Fork chapter

#### Sensitive species

Sensitive species should be determined by known rarity and threats. Monitoring is necessary for adaptive management of sensitive species and their habitat. MNPS believes that off-road vehicle use should be prohibited in areas supporting species of conservation concern. Proposed logging and mining operations should be thoroughly surveyed for sensitive plant species and communities before activities commence.

#### Special botanical areas and other special areas

MNPS encourages the protection of uncommon habitats because these provide homes for rare plant species (e.g., Mary's Frog Pond). For example MNPS has designated St. Mary's Peak as an Important Plant Area. We urge continued protection of Research Natural Areas and Special Botanical Areas.

#### Invasive exotic plants and herbicide application

Broad-scale herbicide application, such as boom spraying, should generally be avoided. MNPS believes that populations of invasive species and the associated native component should be monitored both before and following control measures, so that the treatment efficacy can be evaluated. Broad-scale herbicide application should be followed immediately by effective restoration plantings (Biological Conservation 197: 8-17, 2016). Road construction for timber harvest should be minimized. New roads should be closed and restored once harvest is completed to help minimize noxious weed infestations.

#### Streams and wetlands

Wetlands should be protected by prohibiting or limiting timber harvest, road construction and other disturbances in the watershed that can adversely alter hydrology. Guidelines should include prohibiting new road construction within 300 ft of significant wetlands. Streams that have been degraded should be restored in order to promote insect and plant diversity. Exotic species should be controlled with minimal harm to native species and stream function. Natural disturbance regimes such as flooding should be maintained.

#### Grasslands

Grasslands west of the Continental Divide have not evolved with grazing. As a result, livestock grazing must be managed carefully and minimized during the short growing season. Prescribed fire can be used to protect native grasslands from conifer invasion. Off-road vehicle use should not be allowed in native grasslands. Monitoring grasslands is important to detect and control invasive, exotic plants which need to be controlled with herbicide spot-spraying (see above). Pollinator habitat should be protected whenever possible.

#### Forests

Whitebark pine populations should be restored where they have been severely damaged by blister rust. MNPS believes that restoration of whitebark pine communities through planting of blister rust-resistant genotypes should

be a main objective. Old-growth forest, especially at lower elevations (e.g., West Fork Fish Creek, Ward Creek) should be conserved. These forests are an important contributor to biological diversity, especially lichens and mosses (Canadian Journal of Botany 69:1745, 1991). Minimizing road construction for timber harvest and closure and restoration of roads that are constructed to help minimize noxious weed infestations is important. Timber harvesting should include guidelines for replanting and minimizing weed encroachment. Planting conifers and tall shrubs should be used to decommission new and perhaps some old roads. Historical fire regimes should be preserved whenever and wherever possible.