

11 August 2019

Bureau of Land Management Attn: Dan Brunkhorst 920 Northeast Main Lewistown, MT 59457

Dear Lewistown BLM Resource Management Plan Revision Team,

Thank you for the opportunity to comment on the revision of the Lewistown draft Resource 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. Our comments, organized by draft document page, are below and as an attachment.

- **2.1** MNPS agrees with BLM that monitoring the results of management activities is critical for adaptive management.
- **2.6.3** MNPS agrees that there are no areas on the Lewistown District that are appropriate for an OHV play area.
- **2.7**, **p.54** Acid shale forests have unique vegetation and may support rare plants and animals. For example, Bruce McCune (Oregon State University) has identified five species of rare lichens in the genus *Cladonia* that occur on acid shale in the Mosby and Briggs Coulee areas. One of these appears to be a species new to science. MNPS believes that special designation should be given to areas of acid shale forests in the Mosby area and perhaps expanded in the War Horse area to protect these rare and fragile plant communities and the rare organisms they support. Contact Bruce McCune for more information on the rare lichens (mccuneb@oregonstate.edu).

There are several BLM Outstanding Natural Areas (ONA) along the Front Range of the Rockies. Ear Mountain, Blindhorse, Chute Mountain and Deep Creek/Battle Creek all have significant limber pine woodlands and should continue to be protected. The Ear Mountain ONA has several small wetlands including a small fen supporting a population of round-leaved orchis (*Amerorchis rotundifolia =Orchis rotundifolia*).

- **2.7, p.19-20** MNPS believes that areas of public lands should be surveyed for biological values (i.e., sensitive plants and animals) prior to being made available for mineral leasing. This helps to avoid problems further along in the process of mineral leasing and extraction.
- **2.7, p.12-14** BLM administers ca. one million acres of prairie that has been converted to stands of crested wheatgrass. These stands usually have low native plant species diversity resulting in poor animal diversity. MNPS does not believe that these stands should be "improved" to increase production. Rather MNPS believes that BLM should make an effort to restore crested wheatgrass stands to some semblance of native vegetation. At least one attempt has been made along these lines, and researchers at Montana State University are working on developing restoration protocols. The Billings District management plan addressed this issue by setting annual restoration goals.

Only species native to a site should be used in restoration. Using exotic species frequently creates greater problems than those it was meant to address; witness Lehmann lovegrass and Garrison creeping foxtail.

MNPS agrees with the goal of improving the condition of sagebrush steppe, grasslands, shrublands and forest vegetation.

- **2.7, p.15-16** Wetlands and riparian areas occupy only a small portion of the landscape, but support a large portion of the biological diversity. For this reason they should be protected and enhanced when possible. Protecting biological diversity should be the primary goal in management of riparian areas. Historical bison grazing was not common in riparian areas, so riparian vegetation has not evolved with grazing pressure as the uplands have. These areas should be protected from livestock grazing as much as possible by being fenced out of allotments or through regular deferments. Impoundments may be contributing to reduced spring flows in smaller drainages with the result that cottonwood recruitment is becoming unlikely or impossible. Roads and powerline corridors should be minimized in riparian corridors.
- **2.7, 16-17** Leafy spurge can become a serious threat to the integrity of native grasslands and steppe. Nascent infestations should be treated promptly. Larger infestations should be mapped and biocontrol introduced for control. Russian olive can become a problem in riparian areas and reduce the likelihood of cottonwood recruitment. It should be eliminated from all riparian areas.

Restoration measures, such as seeding appropriate native species, should be applied immediately after mechanical or chemical treatments. Otherwise the same weed or a different one will invade the open ground created by treatment (see Pearson et al. 2016. Biological Conservation).

MNPS believes that disturbance of areas with weed infestations should be minimized until the infestation is controlled.

Table 4.24 MNPS prefers Alternative B because it protects the most riparian habitat from livestock grazing.

Table 4.27 MNPS supports Alternative B because it designates more area protected from disturbance and development.

4.2.4 MNPS supports Alternative B because it best protects sensitive soils such as acid shale or sandy sites. Alternative B would encourage the rejuvenation of certain riparian areas by reducing the effects of water impoundments. MNPS supports Alternative B because it maximizes disturbances to native plant communities and it protects a greater diversity of vegetation types as ACECs.

Thank you for considering our comments, and for your good work conserving these special landscapes.

Sincerely yours,

Gretchen Rupp, President

Gretchin Rupp

Committee

Peter Lesica, Chair - Conservation

leter Lonca