MONTANA NATIVE
PLANT SOCIETY
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May 15, 2019

Custer Gallatin National Forest
Attn: Forest Plan Revision Team
P.O. Box 130
Bozeman, MT 59771

Dear Custer-Gallatin Forest Plan Revision Team,

Thank you for the opportunity to comment on the revision of the Custer Gallatin Forest 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 submitted online.

2.3.5 Watershed and Aquatics (WTR), Objectives 01 MNPS believes that stream and wetland restoration is important for maintaining plant species diversity. The natural hydrology of wetlands such as fens and marshes as well as riparian areas should be protected and restored as much as possible.

2.3.5 Watershed and Aquatics (WTR), Objectives 03 MNPS believes that protection and restoration of at-risk aquatic plants should be prioritized.

2.3.9 At-Risk Plant Species (PRISK), Objectives 01 At-risk species occurring on Custer-Gallatin should first be ranked based on their degree of risk. For example, *Carex gravida* is associated with green ash woodlands on the Sioux and Ashland districts. These woodlands are heavily used for livestock grazing. On the other hand, *Shoshonea pulvinata* is globally rare but is not threatened by human activities at this time, so at this time it should be ranked lower than *Carex gravida*.

Permanent monitoring should be established for at-risk plant species to allow for adaptive management. MNPS believes that there should be as many projects to promote conservation of at-risk plants as possible.

The identification and taxonomy of *Heterotheca fulcrata* requires an expert's opinion before the species is placed on the species of conservation concern (SCC) list. The Flora of North America monograph indicates that hybrids are common.

Three additional species should be considered for listing as species of conservation concern on the CGNF. *Lomatium nuttallii* has been collected only twice in Montana; one was in the valley of the Tongue River. *Penstemon caryi* is a local endemic, and nearly all of the known populations in Montana are on the CGNF. The only known location for *Kobresia sibirica* in Montana occurs on the Line Creek Plateau, in an area often visited by hikers.

MNPS believes that off-road vehicle use should be prohibited in areas supporting species of conservation concern. Weed control should be limited to spot spraying of herbicide in areas supporting species of conservation concern. Moderate livestock grazing may benefit species of conservation concern in grassland and shrubland environments that experienced bison grazing in the past. However, grazing should be limited or curtailed in wetland, riparian, alpine and forested environments.

2.3.10 Forested Vegetation (VEGF), Desired Conditions (FW-DC-VEGF), 03 Tables 6 and 12 show that old-growth forest is below desired condition. MNPS believes this indicates that harvest of old-growth forest should be avoided when possible.

(FW-DC-VEGF), 07 MNPS agrees that connectivity is an important goal when managing forests on public lands.

(FW-DC-VEGF), 10 MNPS agrees that the amount of old-growth forest should be increased or at least maintained to promote biological diversity.

Objectives (FW-OBJ-VEGF), 01 MNPS believes that the Forest Service should implement as many management projects as possible with the aim of benefitting at-risk species habitat, pollinator habitat and general terrestrial ecosystem conditions.

2.3.11 Grassland, Shrubland, Woodland, Riparian, and Alpine Vegetation (VEGNF), Desired Conditions (FW-DC-VEGNF) Green ash woodlands are often not resilient to fire (see MSU Extension bulletin 4601). Cottonwoods, especially plains cottonwood, are killed by fire and may not resprout. A flood event may be needed to reinitiate a burned stand of cottonwood.

Goals (FW-GO-VEGNF) MNPS agrees that it is important to expand inventories, identify potential habitat for at-risk species, and promote protection and restoration of associated habitats. We also believe that it is important to prioritize aspen, woody draws, and riparian areas.

Guidelines (FW-GDL-VEGNF) MNPS agrees with the proposed guidelines but also believes that surface and groundwater sources should be protected in order to preserve wetland areas such as ponds, marshes and fens.

2.3.14 Invasive Species (INV), Standards (FW-STD-INV), 02-03 MNPS believes that populations of invasive species and the native component should be monitored both before and following control measures, so that the treatment efficacy can be evaluated. Broad-scale herbicide application, such as boom spraying, should generally be avoided.

Guidelines (FW-GDL-INV) MNPS agrees that seeding soon after weed control is essential for success. Insofar as possible, native species should be used in these restoration efforts.

2.4.5 Permitted Livestock Grazing (GRAZ), Goals (FW-GO-GRAZ), 01 MNPS agrees that wetlands, riparian areas and green ash woodlands should be protected from livestock grazing, especially during the growing season, whenever possible.

Standards (FW-STD-GRAZ) MNPS believes that allotment plans should be adjusted to protect wetlands, riparian areas and green ash woodlands.

Guidelines (FW-GDL- GRAZ) Grazing should be curtailed for several years prior to a controlled burn in dry low-elevation forests in order to allow for accumulation of fuels that will carry the fire and kill the woody undergrowth. MNPS believes that wetlands, riparian areas and green ash woodlands should be protected from livestock grazing, especially during the growing season, whenever possible.

2.4.39 Research Natural Areas (RNA), Goal (FW-GO-RNA) MNPS believes that the Forest Service should designate at least one RNA to represent green ash woodlands.

2.4.40 Special Areas (SA) MNPS recommends a Special Botanical Area for a portion of the Pryor Mtns. that supports populations of both *Shoshonea pulvinata* and *Penstemon caryi*. Both are local endemic species found only in this part of MT/WY. T8S R27E should be surveyed and then special designation should be given to an area large enough to protect these species and the other species identified in the MNPS Pryor Mountains Important Plant Area.

Ranunculus sulphureus is widely disjunct in the Beartooth Range from up near the Arctic Circle. It would be appropriate to designate a Special Botanical Area for one of the larger populations.

3.2 Sioux Geographic Area, 3.2.5 Forest Plan Land Allocations MNPS supports special designation for the Chalk Buttes area.

3.3 Ashland Geographic Area, 3.3.5 Forest Plan Land Allocations MNPS supports protection of the biological values for the Tongue River Breaks, which likely include habitat for *Astragalus barrii*, a regional endemic plant. We believe that recommended wilderness would provide the most protection.

3.4 Pryor Mountains Geographic Area, 3.4.7 Plan Components– Terrestrial Vegetation (VEGNF) MNPS applauds the Forest Service for recognizing the unique botanical values of the Pryor Mountains.

3.4.5 Forest Plan Land Allocations MNPS recommends a Special Botanical Area for a portion of the Pryor Mountains that supports populations of both *Shoshonea pulvinata* and *Penstemon caryi*. Both are local endemic species found only in this part of MT/WY.

Guidelines (PR-GDL-VEGNF) MNPS agrees that sensitive plant species should be protected from mineral development, recreation, and livestock and wild horse grazing.

3.5 Absaroka Beartooth Mountains Geographic Area, 3.5.4 Forest Plan Land Allocations *Ranunculus sulphureus* is widely disjunct in the Beartooth Range from up near the Arctic Circle. MNPS recommends designating a Special Botanical Area for one of the larger populations.

Standards (AB-STD-RNA) The Line Creek Plateau has many rare plants as well as high-elevation wetlands. MNPS supports protecting rare plants and wetlands from horse grazing, camping, mountain biking and ORV use.

3.6 Bridger, Bangtail, and Crazy Mountains Geographic Area, 3.6.2 Distinctive Roles and Contributions Alpine areas near Crazy Peak in the Crazy Mountains support at least two disjunct arctic plant species, *Carex norvegica* (sensu stricto) and *Papaver radicatum*, otherwise known only in the Beartooth Range in Montana.

3.6.5 Forest Plan Land Allocations MNPS recommends special designation to protect the above-mentioned species and their habitat.

3.7 Madison, Henrys Lake, and Gallatin Mountains Geographic Area, 3.7.5 Forest Plan Land Allocations *Castilleja puberula* occurs in the Mount Jefferson area and is disjunct from high elevations of Colorado's Central Rocky Mountains. This area would be appropriate for designation as a Special Plant Area.

Chapter 4. Monitoring Plan FIA and remote sensing methods may be adequate for the coarse-filter approach but are not adequate for the fine-filter approach. For example, on-the ground monitoring is needed to determine whether green ash recruitment is occurring in the understory or whether rare plant populations or invasive exotic plants are increasing or declining. Long-term monitoring programs should be established for at-risk plant species across the CGNF to allow for adaptive management.

Finally, we'd like to make one key point that does not refer to the draft Forest Plan. The Custer-Gallatin National Forest is currently one of only two national forests in Region One that does not have a botanist on staff. MNPS believes that having a Forest Botanist would go a long way to helping conserve biological diversity on the Forest, and we urge the Forest to include this position in future budget requests and plans.

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

Sincerely yours,

Gretchen Rupp

Gretchen Rupp, President

Peter Lesica

Peter Lesica, Chair - Conservation Committee