



## **Environmental Assessment Decision Notice**

### **Eurasian Watermilfoil, Curlyleaf Pondweed, and Flowering Rush Treatment on Noxon and Cabinet Gorge Reservoirs**

**June 10, 2021**

#### **Description of Proposed Project**

The proposed action will maintain the use of herbicide treatment of Eurasian watermilfoil (EWM), curlyleaf pondweed (CLP), and flowering rush (FR) as has been done since 2010 under a previous environmental assessment (EA) as well as allow for the use of new herbicides as they become approved for use. Herbicides will be used to reduce coverage of EWM at access sites and high use areas. All herbicides will be used in accordance with their labels. The proposed action will also involve the use of physical means of treating or harvesting aquatic plants including cutting, pulling, raking, diver dredging, and bottom barriers. Similar to herbicides, these methods may be used to reduce coverage at boat launches and other high use areas (e.g., docks, swimming areas). Mechanical harvest is anticipated to be the primary method to modify EWM beds for the benefit of the fisheries resources in Noxon and Cabinet Gorge reservoirs.

#### **Montana Environmental Policy Act (MEPA) Process and Public Involvement**

FWP released a draft EA for a 30-day public review period on April 23, 2021, with comment closing May 24, 2021. The EA was advertised through media releases and legal notices in the Flathead Beacon, Helena Independent Record, Sanders County Ledger and on the FWP website and social media (Facebook & Twitter). Copies of the EA were available from the Kalispell FWP office, on the FWP web site, and at the Montana State Library and the Flathead County libraries.

The EA evaluated the potential impacts of the following alternatives:

**1. Alternative A: No Action**

This alternative would result in EWM, CLP, and FR being untreated in Noxon and Cabinet Gorge reservoirs. This could result in excessive growth, degraded fish habitat, and an increased likelihood of EWM and CLP attaching to watercraft or trailers and being transported to new waterbodies. This alternative is inconsistent with the management of EWM, CLP, and FR in Noxon and Cabinet Gorge reservoirs over the last ten years and with the adaptive management framework that has been implemented on these reservoirs since 2017.

**2. Alternative B: Proposed Action**

The Proposed Action would allow for the continued management of EWM, CLP, and FR by the Task Force and cooperating entities in Noxon and Cabinet Gorge reservoirs and reduce potential negative effects of these invasive aquatic plants. In addition, the Proposed Action includes more methods to control EWM, CLP, and FR than the previous EA and facilitates the use of any of these methods to manage EWM and CLP to benefit the fisheries present in each reservoir. Treatment under the proposed action will occur at locations determined annually based on pretreatment sampling results and available funding. Herbicide treatment will typically consist of a single event in late summer due to flow and turbidity conditions associated with spring runoff. Physical treatment may occur whenever necessary; however, it is most likely to occur as a single event in early summer with the potential for a second treatment in mid- to late summer. Depending on size, one or several priority and/or fish habitat areas may be treated daily. While it typically takes < 3 days to treat both reservoirs with herbicides, physical treatment may take up to a week per reservoir. Minimal disruption to recreation is anticipated because treatment is restricted to specific locations within a reservoir and will occur over a brief time period ( $\leq 1$  day) at each location. Overall, the Proposed Action seeks to improve the health of the fish habitat and provide more fishing and recreational access to the reservoirs earlier in the season.

### **Summary of Public Comment:**

FWP received one email and two online comments on the proposed project, and FWP staff reviewed these to identify comments. A comment was defined as a specific issue or impact. In some cases, multiple people listed the same or similar comments; these comments are summarized and listed once, and one response is provided.

The following is a synopsis of public input received during the comment period and FWP's response to those comments organized by subject matter.

## **I. Environmental Review Checklist**

### **3. Water**

*Comment A: 3a & h predict that water quality will have only minor effects – once again, if new herbicides or new combinations of herbicides are to be used, this should prompt a new review.*

FWP Response A: New herbicides will be used after receiving U.S. Environmental Protection Agency and Montana Department of Agriculture approval for aquatic use. As part of receiving approval by the U.S. Environmental Protection Agency, herbicides are studied to define application rates that are not toxic to humans, fish, invertebrates, or other animals. In addition, herbicides will be applied by licensed applicators and all instruction labels will be followed so that only minor effects to water quality may occur. Language has been added to the *Narrative summary of the proposed action* section of the EA to clarify that new herbicides need to be approved for aquatic use by both the U.S. Environmental Protection Agency and the Montana Department of Agriculture.

*Comment B: 3j. No effects expected on other water users as a result of any alteration in surface water quality – I would think that use of herbicides has the potential to affect downstream users of water for irrigation or drinking.*

FWP Response B: Following instruction labels, licensed herbicide applicators will apply the minimum amount of herbicide necessary to treat Noxon and Cabinet reservoirs. In addition, only limited areas will be treated (a maximum of 200 acres). These practices along with the high flow rates in the reservoirs and relatively high discharge of the Clark Fork River should result in no impacts to downstream users. As previously mentioned, approval by the U.S. Environmental Protection Agency involves defining application rates that are not toxic to humans, fish, invertebrates, or other animals.

#### **4. Vegetation**

*Comment C: 4a & b indicate that potentially significant benefits are expected in the plant community (presumably the aquatic plant community). Are the herbicides & harvesting expected to kill/remove non-native water weeds, but not kill/remove native water plants? What is the evidence for this?*

FWP Response C: The herbicides will kill/remove both non-native and native aquatic plants. Areas are only treated with herbicide when non-native aquatic plants are present in density that causes a nuisance. Additionally, treatment occurs at limited locations such as boat launches and other high use areas resulting in most habitat suitable for native aquatic plants left being untreated.

*Comment D: 4e indicates that there will be a minor impact on establishment/spread of noxious weeds – apparently due to possible release of fragments; as mitigation an attempt will be made to collect the fragments. Is this a capability of the harvesters being considered for use?*

FWP Response D: The machinery used to harvest the non-native aquatic plants should collect the majority of plant fragments. Although some fragments will escape, they are unlikely to result in any new populations within the system.

#### **5. Fish & Wildlife**

*Comment E: 5c predicts minor beneficial impacts to nongame fish species. Have impacts on amphibians been considered?*

FWP Response E: Amphibians were considered in the 2010 EA for herbicide treatment of non-native aquatic vegetation and it was anticipated that the invasion of EWM and CLP in the reservoirs could have a detrimental effect. This EA is written to be consistent with the findings of the 2010 document. In addition, because a limited area may be treated, it is anticipated that the project will not have any measurable effects, good or bad.

*Comment F: 5g says there will be minor increases in conditions that stress wildlife populations but that this will be beneficial. The footnote does not explain this but seems to contradict it, saying that fish habitat quality is expected to increase. I would think that harvesting could impact amphibians, and possibly aquatic insects used by other species. In addition, noise from harvesters may impact birds that nest near the water's edge.*

FWP Response F: The project may result in additional stress due to more recreational use, but this is extremely minor. Overall we consider this a benefit because these reservoirs sustain popular fisheries. The purpose of the mechanical treatment is to improve fish habitat. An

improvement in fish habitat may improve fish numbers and thus result in more harvest. While increased harvest may be a stressor to fish populations, in this scenario it is considered a beneficial effect. Because of the limited areas treated and the limited amount of time required to treat under the EA, it is anticipated that negative impacts to amphibians, insects, and birds will be minor and short-term. 5g has been edited to recognize these potential effects.

## **10. Public Services**

Comment G: *10a predicts no impact on solid waste disposal – does not say how the harvested water weeds are to be disposed of.*

FWP Response G: A note has been added to 10a to clarify that harvested material will be transported offsite to either be disposed of in the local landfill or composted.

Comment H: *10d predicts no increased use of an energy source – yet the harvester will use fuel.*

FWP Response H: Typically, 10d refers to new utility demand, and not fuel. However, you are correct that fuel will be used for this project.

## **11. Aesthetics/recreation**

Comment I: *11a predicts no alteration of scenic vista – yet flowering rush was introduced as an ornamental. There may be some who see its removal as affecting the aesthetics of the area.*

FWP Response I: Flowering rush is listed as a priority 2A noxious weed in Montana, therefore, it has been determined that any potential aesthetic benefits of the plant are outweighed by its negative ecological effects.

## **13. Significance**

Comment J: *13d Establish a precedent or increase likelihood of propose future actions that may have significant effects – since the harvesting is being studied to see if it could benefit fish populations – it may result in recommendations to do more harvesting.*

FWP Response J: Increased harvest is not viewed as establishing a precedent as harvesting would be used in lieu of herbicide treatment and the total treatment area will remain at 200 acres.

Comment K: *13e not expected to generate substantial debate or controversy – most changes in management generate some controversy – especially if they are visible. And harvesting is visible and may draw attention to herbicide use as well.*

FWP Response K: Herbicide treatment is a visible activity and has been occurring on Noxon and Cabinet Gorge reservoir for over a decade. The local community is notified annually about treatment activities and it is believed that they are generally aware of the program.

## **II. Summary of support for the project**

Comment A: *There were two commentors that voiced support for this project.*

FWP Response A: Treatment of EWM, CLP, and FR has been a long-term activity on Noxon and Cabinet Gorge reservoirs that has garnered much local support. Many entities are actively involved with the management of these invasive plants and numerous grants have funded monitoring and herbicide application.