**ana Department
of
Fish, Wildlife & Parks**

**Decision Notice
For Proposed Noxious Weed Management Plan
Department of Fish, Wildlife and Parks
Region 3**

**Department of Fish, Wildlife and Parks
1400 South 19th Avenue
Bozeman, MT 59715**

STATE DOCUMENTS COLLECTION

JUL 28 1994

March, 1994

**MONTANA STATE LIBRARY
1515 E. 6th AVE.
HELENA, MONTANA 59620**

The Montana Department of Fish, Wildlife and Parks proposes to implement their Noxious Weed Management Plan which outlines an integrated approach to noxious weed management on all of their owned or leased lands in Region 3 (Southwest Montana).

The department received eight separate sets of written comments pertaining to the Environmental Assessment prepared for the Noxious Weed Management Plan. These comments are summarized below.

1. Encourage the use of non-impacting methods of weed control to protect surface archaeological resources. Cultural methods and boom spraying have much more negative affect than biological controls.
2. New species of Larkspur, Delphinium bicolor, was recently identified at Lewis and Clark Caverns State Park. This is a plant of "special concern". Also, Urophora affinis released at this park in 1985 and 1986. Park's acreage has recently increased from 2696.1 to 2887 acres.
3. Alternative 1 (Status Quo) is unacceptable because of uncoordinated and undocumented efforts in past. Must coordinate with weed boards and adjacent landowners in future. Otherwise, commend efforts on EA and Plan.
4. Noxious Weed Management Plan is well thought out but recommend that we reconsider aerial application as a good method for spraying herbicides.
5. No comment, thanks for letting us review.
6. Overall, the documents were well prepared but would like to see grazing management systems addressed as a useful weed control tool. Also, should look into coordinating weed control activities with other public agencies to stretch budgets.

PLEASE RETURN

7. Department is legally bound to submit weed management plan to county board; professional applicators should be contracted, not county weed crews; should prevent introduction and manage current infestations; quarantines to restrict access to land should be considered; non-chemical alternative will not meet legal obligation; interpreting label regarding rainfall requirement, set-back from water and herbicide loading in soils; FW&P does not have adequate funds or manpower to carry out an effective program; environmental review criteria should consider impact of not treating weeds on wildlife.
8. Concerned the department is reacting to "weed-mania" with quick fix use of chemicals. Should emphasize long term solution of vegetation enhancement through livestock grazing systems (rest-rotation management, A.L. Hormay). Very disappointed that department did not focus on this approach. Also, photo monitoring should be considered; chemicals should be avoided in riparian areas altogether; the questions of liability, funding and long term use of chemicals should be addressed; should include causes and reasons for weeds spreading in Montana.

Based on these comments, the following changes were made to the draft EA:

1. Page 48, table 11 (Plant Species of Special Concern) - added Larkspur sp., Delphinium bicolor, Lewis and Clark Caverns State Park. Also added to appendix F of the Noxious Weed Management Plan.
2. Page 13, table 3 - changed acreage of Lewis and Clark Caverns from 2696.1 to 2887.

At this time, the department would like to make the following clarifications and explanations regarding implementation of their Noxious Weed Management Plan.

1. The department fully recognizes the merits of rest-rotation grazing management, where livestock can be used to enhance the quality and quantity of vegetation and soil conditions (Hormay, A.L. 1961 Rest Rotation Grazing - A New Management System For Perennial Bunchgrass Ranges).
2. Chemicals will not necessarily be the primary method driving our weed control efforts. The department recognizes that chemical herbicides will probably be used as a tool for short term control providing all Environmental Review Criteria are met (pages 59 and 60, EA). The department acknowledges that long term noxious weed control can only be accomplished through re-establishing healthy perennial vegetation and through the establishing of natural predators (bio-controls).
3. The department is required to control those state and county declared weed species which occur only on those lands which they own or control (lease). The department is not responsible for controlling weed infestations along river and stream banks, riparian corridors or on islands which are in private ownership.

With these revisions, the draft EA has been adopted as the final EA. This decision notice will act as a supplement which changes the draft to the final EA.

The department has evaluated the EA and applicable laws, regulations and policies and has determined that this action will not have a significant effect on the human and natural environment. Therefore, an environmental impact statement will not be prepared.

The department's decision is to implement an integrated Noxious Weed Management Program as proposed in alternative 2 of the EA.

The Environmental Assessment may be viewed or obtained from the Department of Fish, Wildlife and Parks, Bozeman, Montana. Please direct requests and questions to me.

Thank You.

Sincerely,

A handwritten signature in dark ink, appearing to read "E. Richard Vincent". The signature is fluid and cursive, with the first name "E." and last name "Vincent" clearly distinguishable.

E. Richard Vincent
Acting Regional Supervisor
(406) 994-4042