



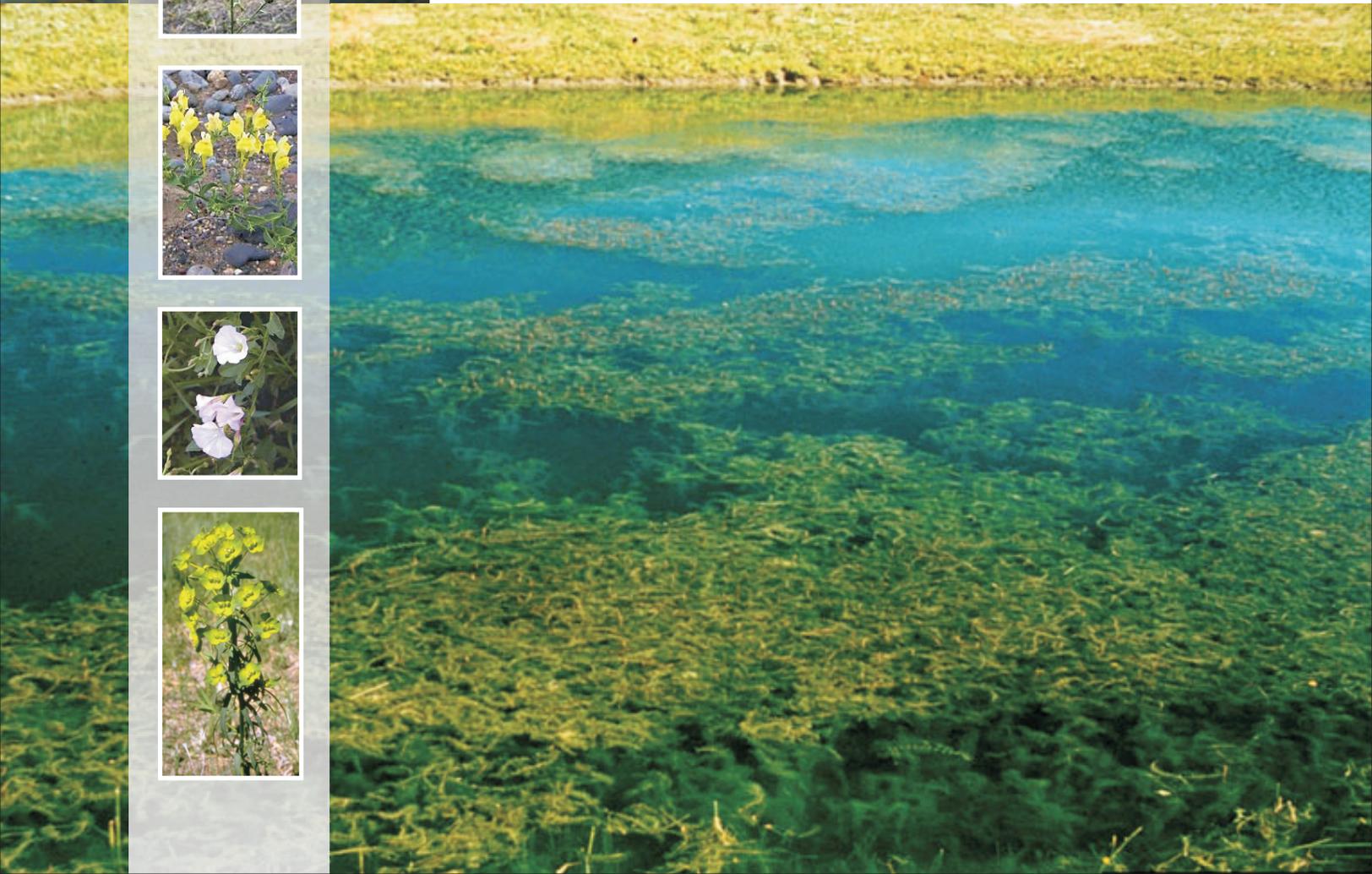
Final Programmatic  
Environmental Impact Statement

Noxious Weed  
Trust Fund Grant Program

May 2010



**MONTANA DEPARTMENT OF AGRICULTURE**



## CHAPTER 1

### INTRODUCTION AND BACKGROUND

The Montana Department of Agriculture (MDA) administers the Noxious Weed Trust Fund (NWTF) under provisions of the Montana Noxious Weed Trust Fund Act of 1985 (80-7-8, Montana Code Annotated). The MDA collects funds generated from interest on the permanent noxious weed management trust fund, ongoing revenue from a 1.5% fee on motor vehicle registration, the general fund, Cooperative Forestry Assistance, and other federal funding. Revenue is distributed through cost-share grants or contract funds to communities, weed districts, universities, or other entities it considers appropriate for noxious weed research, public education and outreach, and local cooperative weed management projects.

A variety of techniques were used to notify the public about their opportunity to be involved in scoping regarding this project. The official scoping comment period occurred from January 13, 2009 through March 2, 2009. The MDA hosted 13 public meetings in February 2009 to provide information to the public, local agencies, and organizations to allow them to identify issues and concerns. The MDA has determined that changes in the grants program since 1992 constitute a major state action which requires preparation of another Programmatic Environmental Impact Statement (PEIS) as dictated by the Montana Environmental Policy Act (MEPA) (75-1-101, MCA) and rules (4.2.312-337 Administrative Rules of Montana (ARM)). The changes include the dramatic increase in the number and types of herbicides available for weed management (including use of generic products) and the methods proposed for treating some newly invading aquatic species (e.g., direct application of herbicides to water bodies). These changes have complicated the MEPA process for the MDA review of NWTF projects.

#### PURPOSE AND NEED

The MDA completed a PEIS for the NWTF grants program in 1992 and has administered environmental reviews of subsequent grant projects under guidelines developed by that document. The MDA has determined that changes in the grants program since 1992 constitute a major state action which requires preparation of another PEIS as dictated by the Montana Environmental Policy Act (MEPA) (75-1-101, MCA) and rules (4.2.312-337 Administrative Rules of Montana (ARM)).

The changes include the dramatic increase in the number and types of herbicides available for weed management (including use of generic products) and the methods proposed for treating some newly invading aquatic species (e.g., direct application of herbicides to water bodies). These changes have complicated the MEPA process for the MDA review of NWTF projects. The purpose of the project is to develop strategies for performing the MEPA responsibilities of the NWTF Grant Program.

#### Alternatives Description

Abbreviated descriptions of the Alternatives are provided below. Complete descriptions are presented in Chapter 2 of the original DPEIS.

### **No Action Alternative**

The No Action Alternative provides for continuation of the NWTF program in the same manner it is presently administered by the MDA. Projects funded by the NWTF are evaluated to measure effectiveness of the grant program. Individual projects are divided into four categories including: (1) cooperative weed management projects; (2) research; (3) education and outreach; and (4) special county and reservation grants.

### **Proposed Action Alternative**

The Proposed Action provides for continuation of the NWTF program in the same manner as it is presently administered by the MDA with a modification of the process by which the level of MEPA reviews are selected and developed. Under the Proposed Action, administration, development, distribution, and prioritization of NWTF funds and projects will continue to occur as described under the No Action. The Proposed Action proposes clarification and further definition of the MEPA process for MDA NWTF projects as presented within the MEPA process by a proposed flow chart. In order to provide a program to thoroughly evaluate any and all types of grant applications, a flow chart has been created to clearly identify the decision points of the MEPA review process. The Proposed Action also includes a reformat on the NWTF Checklist Environmental Assessment (EA) worksheet. The reformatted Checklist EA worksheet would allow the MDA and grant applicants to efficiently provide appropriate information for a MEPA review. The NWTF has received grant requests for aquatic weed treatment projects, which have included direct application of herbicides to water bodies as part of an integrated weed management approach. Future projects would undergo review by a full environmental assessment (as has been the case with the two previous grant proposals), unless they will only be implemented in isolated water bodies, which may only require a checklist EA. As per any terrestrial herbicide application, herbicides must be applied according to their EPA approved labels. Only projects using herbicides approved for direct water application would be approved by the NWTF Grant Program environmental review process.

## CHAPTER 2

### ANALYSIS OF COMMENTS

The eight comments received on the DPEIS are summarized and responded to by the section of the document they address. The comment e-mail is presented in **Appendix B**.

#### SOILS

##### Comment Summary

There is no mention of soil types in Eastern Montana on Page 3-7 and Eastern Montana's description of "flat sedimentary plain" is not entirely correct.

##### Issues Raised and Responses

This is a very general discussion of soils and topography in Montana and does not cover all conditions and features in the State. The description is adequate for the level of technical analysis conducted.

#### WATER RESOURCES AND GEOLOGY

##### Comment Summary

On page 3-9 Yellowtail Dam, Tongue River Dam and Fort Peck Dam are not mentioned.

##### Issues Raised and Responses

The description of water resources in the state is very general and some features are not included.

##### Comment Summary

**Table 3-1, Summary of Water Quality Standards for Common Herbicides Used in NWTF Projects**, does not specify whether this is the 2,4 D product approved for aquatic application or only terrestrial application.

##### Issues Raised and Responses

The information in this table is for the terrestrial 2,4 D product only. Details on the 2,4 D approved for aquatic application are provided in **Appendix A** of the DPEIS in the **Table** labeled **Herbicide Guidelines for Aquatic Weed Management in Montana Based on Herbicides Currently Approved in the State**.

## **WILDLIFE AND FISHERIES**

### **Comment Summary**

There is no mention of riparian areas on page 3-14.

### **Issues Raised and Responses**

Broad descriptions of habitat are discussed, so riparian areas are not specifically listed. Riparian areas are discussed in the Vegetation section of Chapter 3.

## **APPENDIX A HERBICIDE PROPERTIES AND APPLICATION GUIDELINES TABLES**

### **Comment Summary**

Common Crupina and Russian Olive are listed in **Appendix A** of the DPEIS. They are not currently designated as Noxious Weeds in the State of Montana.

### **Issues Raised and Responses**

**Appendix A** of the DPEIS incorrectly lists Common Crupina as a Category 3 Noxious Weed, which is in error and a carryover from the former weed classification system. It is no longer listed as a Noxious Weed in Montana under the new Priority system and should be removed from this table. This table has been corrected and is attached. Russian Olive is also listed on this table since it can be listed as a Noxious Weed by individual counties if they so choose. Hence, it is correct to have the herbicide guidelines listed for treatment of Russian Olive for future reference if a county chooses to designate it as a Noxious Weed.

## **APPENDIX C ENVIRONMENTAL ASSESSMENT WORKSHEET**

### **Comment Summary**

Why does Section 5 of the Environmental Assessment Worksheet state that all grazing projects are required to consult with FW&P. If the project is in Eastern Montana, the big horn sheep and grizzly bear probably are not an issue and wolves have been delisted.

### **Issues Raised and Responses**

The Worksheet could be read to require consultation with FW&P for all sheep and goat grazing projects, which was not the intent. The Worksheet has been modified to clarify that the applicant or MDA reviewer can skip this requirement in areas of the State that do not support these species. The revised page of the Worksheet is attached.

## **ERRATA AND REPLACEMENT PAGES**

The following corrections to the DPEIS have been made for the final PDEIS:

- Several cited references were missing from the DPEIS so a new list is attached.

- The corrected Table Herbicide Application Rate and Time of Application to Provide Optimum Noxious Weed Control on Range, Pasture and Wildland Areas is attached.
- A copy of the email providing the written comments received on the DPEIS is attached.
- The revised page of the Environmental Assessment Worksheet is attached.

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## **APPENDIX A**

**Table labeled - Herbicide Application Rate and Time of Application to Provide Optimum Noxious Weed Control on Range, Pasture and Wildland Areas.**

## Herbicide Application Rate and Time of Application to Provide Optimum Noxious Weed Control on Range, Pasture, and Wildland Areas

Weed Species	Plant biology	Herbicide (trademark)	Herbicide <sup>1</sup> Rate/Acre	Herbicide Application Timing	Comments
<b>Blueweed</b>	Biennial/ Tap-rooted	Cimarron <sup>2</sup> or Telar	0.5 to 1 oz	Rosette to early bud; fall	Use with a non-ionic surfactant
<b>Cinquefoil Sulfur (Erect)</b>	Perennial/ Tap-rooted	ForeFront R&P	2 to 2.5 pints	Active growth	Can apply to waters edge – do not get in water
		Milestone	4 to 6 fl oz	Pre-bud	
		Tordon 22K	1 pint	Active growth	Do not apply to shallow groundwater areas
		2,4-D	2 quarts	Rosette to bud	Apply before flower growth stage
<b>Common tansy</b>	Perennial/ Rhizominous	Cimarron or Telar	0.5 to 1 oz	Bolt to bud	Use with a non-ionic surfactant
<b>Dyers woad</b>	Perennial/ Tap-rooted	Cimarron	0.5 to 1 oz	Rosette to bud	Use with a non-ionic surfactant
		Telar	0.5 to 1 oz		
<b>Field bindweed</b>	Perennial/Deep-rooted Rhizominous	Tordon 22K + 2,4-D	1 quart + 1 quart	12" of growth, or fall	Do not apply to shallow groundwater areas
		Tordon 22K	1 quart	12" of growth, or fall	
<b>Hawkweed Meadow Orange</b>	Perennial/Shallow-rooted/ Rhizominous	ForeFront R&P	2 to 2.5 pints	Bolt to bud	Can apply to waters edge – do not get in water Addition of N fertilizer may improve control.
		Milestone	4 to 6 fl oz		Treat outside of dripline of desirable trees
		Redeem	3 pints	Bolt to bud	Do not apply to shallow groundwater areas
<b>Hoary alyssum</b>	Biennial to perennial/Tap-rooted	Cimarron or Telar	1 oz	Rosette to late bud	Use with a non-ionic surfactant
		2,4-D+ dicamba	1 qt + 1 qt	Rosette to early bolt	
<b>Houndstongue</b>	Biennial/Tap-rooted	Cimarron or Telar	0.5 to 1 oz	Rosette to late bud	Use with a non-ionic surfactant Must apply before bolting growth stage
		2,4-D	2 quarts	Rosette	
<b>Knotweed complex</b>	Perennial/Rhizominous	Habitat	2 qts/ac	Cut plant to within 12" of ground prior to treatment	Caution: can cause injury to desirable trees/shrubs if root systems extend into treated area
		glyphosate	5ml/stem	Inject full strength	Must treat each stem – may need re-treatment
<b>Knapweed Spotted Diffuse Yellow starthistle</b>	Tap-rooted	Milestone	5 to 7 fl oz	Actively Growing	Can apply to waters edge – do not get in water
	Perennial	ForeFront R&P	2 pints		
		Curtail	2 quarts	Rosette to bud	Do not apply to shallow groundwater areas
	Biennial/perennial Annual	Tordon 22K	1 pint	Actively growing	
		Transline	2/3 pint	Rosette to bud	
		2,4-D	2 quarts	Rosette to bolt	Provides least effective control of herbicides listed

From: Duncan, 2008

<sup>1</sup> Rate is based on amount of product/acre

<sup>2</sup> Metsulfuron, sold under trade names of Cimarron, Escort and others.

Weed Species	Plant biology	Herbicide (trademark)	Herbicide Rate/Acre	Herbicide Application Timing	Comments
<b>Knapweed Russian</b>	Perennial/Deep-rooted Rhizominous	Milestone	4 to 6 fl oz	Bolt to bud, or fall	Can apply to waters edge – do not get in water
		ForeFront R&P	2 to 2.5 pints	Bolt to bud, or fall	
		Tordon 22K	1 quart	Bud, flower, or fall	
<b>Leafy spurge</b>	Perennial/Deep-rooted Rhizominous	Tordon 22K	1 to 2 quarts	Full flower or fall	Do not apply to shallow groundwater areas; retreat when control drops < 80%
		Tordon 22K + 2,4-D	1 to 2 pint + 1 quart	Full flower or fall; apply annually for 3 yrs	Combination of Tordon 1 qt + 4 fl oz Plateau; or Tordon 1 qt + 6 oz Overdrive also effective
		Plateau	8 to 10 fl oz	Fall or prior to first frost	Use with non-ionic or methylated seed oil surfactant
<b>Loosestrife, Purple</b>	Perennial/ Deep-rooted Rootstock	Garlon 3A	1.5% solution	Apply July through Aug.	Can use in aquatic sites
		Glyphosate (Aquamaster/ Rodeo)	2 quarts/ac or 2% solution	Pre-flower	Use aquatic label glyphosate such as Rodeo and add an approved surfactant. Use 2% solution + surfactant for spot spraying.
		Habitat	1 pint/ac	Actively growing	Can use in aquatic sites.
<b>Oxeye Daisy</b>	Perennial/Shallow-rooted/ Rhizominous	Cimarron	0.5 oz	Rosette to early flower	Use with a non-ionic surfactant
		ForeFront R&P	2 to 2.5 pints	Rosette to early flower	Can apply to waters edge – do not get in water , Addition of N fertilizer may improve control.
		Milestone	4 to 6 fl oz	Pre-bud	
<b>Pepperweed, Perennial</b>	Perennial/ Deep-rooted Rhizominous	Cimarron	0.75 to 1 oz	Bud to flower	Use with a non-ionic surfactant
		Telar	1 oz	Bud to flower	
		Plateau	10 fl oz	Flower	Use with a methylated seed oil surfactant @ 1 qt/ac
<b>Rush skeletonweed</b>	Perennial/ Deep-rooted Rootstock	Milestone	5 to 7 fl oz	Rosette to early bud	Category 3 weed in MT, contact Dept of Ag. Can apply to waters edge – do not get in water
		Tordon 22K	1 quart	Rosette to early bud;fall	Do not apply to shallow groundwater areas
		Transline	1 pint	Rosette to early bud;fall	
<b>Russian olive</b> Invasive in riparian areas County-listed weed	Woody tree	Arsenal	1% solution	Apply to foliage	Apply 1.3 oz herbicide/gallon water
		Remedy	25-30% solu. + basal oil	Basal bark treatment or apply to cut stump	Apply any time of year: see label for application instructions.
		Glyphosate	Full strength	Apply to cut stump	
<b>St. Johnswort</b>	Perennial/Deep-rooted Rhizominous	Tordon 22K	1 to 1.5 pint	Pre-flower	Do not apply to shallow groundwater areas
		Milestone	5 to 7 fl oz		
<b>Tall buttercup</b>	Perennial/ Rhizominous	ForeFront R&P	2 pints	Seedling to early flower	Can apply to waters edge – do not get in water
		Milestone	4 to 6 fl oz		
		MCPA Amine	2 quarts	Seedling to early flower	
<b>Tamarisk</b> Mature tree	Woody tree	Arsenal	1% solution	Apply to foliage	Apply 1.3 oz herbicide/gallon water
		Remedy	25-30% solu. +basal oil	Basal bark treatment or cut stump	Apply any time of year: see label for application instruction.

Weed Species	Plant biology	Herbicide (trademark)	Herbicide Rate/Acre	Herbicide Application Timing	Comments
Tansy ragwort	Perennial/Rhizominous	ForeFront R&P	2 to 2.5 pints	Seedling to pre-bud	Can apply to waters edge – do not get in water; will damage conifer trees Clip flowers prior to treating to stop seed production – safe to use in conifer trees Not effective when applied at flower stage – suppression only
		Milestone	4 to 6 fl oz		
		Transline	1 pint	Actively growing	
		2,4-D	2 quarts	Seedling to rosette	
Thistle, Canada	Perennial/Deep-rooted	Milestone	5 to 7 fl oz	Bolt to bud, or fall	Can use up to waters edge – do not get in water
	Rhizominous	ForeFront R&P	2 to 2.5 fl oz	Bolt to bud, or fall	
		Redeem	3 to 4 pints	Bolt to bud	Do not apply to shallow groundwater areas
		Curtail	2 to 4 quarts	Bolt to bud	
		Tordon 22K	1 quart	Bolt to bud or fall	
		Transline	1 to 1.3 pints	Bolt to bud or fall	Can apply over conifers trees with no damage; do not apply to shallow groundwater areas
Toadflax Dalmatian Yellow	Perennial/Rhizominous	Tordon 22K	1 to 2 quarts	Flower or fall	Do not apply to shallow groundwater areas Use 2 qts on yellow toadflax for spot treatment Use with a non-ionic surfactant Use with a non-ionic surfactant Results may be inconsistent; apply with MSO
		Telar	1 oz	fall	
		Tordon + Telar	1 quart + 1 oz	fall	
		Plateau + MSO	12 ounces	fall	
Whitetop (hoary cress)	Perennial/Rhizominous	Cimarron	0.5 to 0.75 oz	Pre-bud to bloom (use higher rate at bloom)	Use with a non-ionic surfactant
		Telar	0.5 to 1 oz		
Yellow-flag iris	Perennial/ Rhizominous	Rodeo	8% solution	Bolt to flower – prior to full bloom	Use with an aquatic approved surfactant;

**APPENDIX B**

**WRITTEN COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD**

**From:** Treasure Weed [mailto:treasureweed@rangeweb.net]  
**Sent:** Wednesday, May 05, 2010 9:27 AM  
**To:** Burch, Dave  
**Cc:** Bearden, Carol  
**Subject:** NWTF PEIS

Good Morning-

I read through the proposed PEIS and noticed a few things.

pg. 44- no mention of soil types in Eastern Montana(Parent Material Factor)

Topography- Eastern Montana's description of "flat sedimentary plain"

is perhaps a little off. Makoshika, badlands around Ft. Peck, the Wolf Mts, Big Horns are just an example.

pg 46- no mention of Yellowtail Dam, Tongue River Dam or Fort Peck.

pg 49- chemical sheet- is the 2,4-D listed on it an aquatic 2,4-D or a regular 2,4-D?

pg 51- Wildlife & Fisheries- there is no mention of riparian areas.

pg 73- Common crupina is listed.

pg 74 Russian olive is listed.

pg 88- Grazing Projects- why are all grazing projects required to consult with FW & P? If the project is in Eastern MT, Big Horn sheep and grizzly bear probably are not an issue and wolves have been delisted.

I just noticed these items and thought I'd send them to you.

Jennifer Cramer

Treasure Co. Weed

**APPENDIX C**

**REVISED PAGE OF ENVIRONMENTAL ASSESSMENT WORKSHEET**

# ENVIRONMENTAL ASSESSMENT WORKSHEETS

*Please answer each question on this worksheet. Use additional pages if needed.*

- 1) **FISH AND WILDLIFE HABITAT** : This section should address the potential for effects from weed control actions on fish and wildlife habitat in the project area.

Describe how the use of an herbicide, grazing, tillage, or other control actions for noxious weed management will affect the habitat of a fish or wildlife species currently using the project area. Please include a list of fish and wildlife species in the project area. (The effect of the control action may be negative, positive or neutral. Species that might be affected include big game species such as elk and antelope, upland game birds such as sage grouse and sharp-tail grouse, and non-game birds such as long-billed curlew, western meadowlark, and sage thrasher.)

**For grazing projects** - All sheep/goat grazing projects are required to consult with the Montana Fish, Wildlife and Parks Department (FWP) prior to project implementation in areas associated with bighorn sheep grizzly bears or wolves, due to possible conflicts. Special preventative action and caution may be necessary with grazing projects in these areas. If bighorn sheep, grizzly bears, or wolves are observed in or near your grazing project area, FWP must be notified immediately. Please describe what steps you have in place to address this issue within your project area.

DESCRIPTION:

MITIGATION:

Consult the herbicide label. Does the label identify any fish or wildlife species that are particularly sensitive to the herbicide? If so, how will impacts to these species will be mitigated?