SCOPING STATEMENT
ENVIRONMENTAL ASSESSMENT
FOR THE EURASIAN WATERMILFOIL/ CURLYLEAF PONDWEED RESEARCH PROJECT

I. PROPOSED ACTION

Sanders County, with assistance from the Eurasian Watermilfoil (EWM) Task Force, is proposing to conduct a dye and herbicide research trial on Eurasian watermilfoil and curlyleaf pondweed on up to 40 acres in Noxon Rapids reservoir. The purpose of the research is to determine effectiveness of herbicide treatment on controlling invasive non-native aquatic plants and feasibility of including herbicides in an integrated management approach.

II. BACKGROUND AND DESCRIPTION OF PROJECT

Eurasian watermilfoil (*Myriophyllum spicatum*) is a non-native, submersed, perennial plant that grows in aquatic environments including ponds, lakes, and rivers. The only known infestation of Eurasian watermilfoil in Montana is in Noxon Rapids and Cabinet Gorge reservoirs where the plant was discovered in 2007. The plant has the potential to impact aquatic environments and impair recreational resources. Inventory data collected in 2008 indicate that Eurasian watermilfoil infests 247 acres and 117 acres in Noxon Rapids and Cabinet Gorge reservoirs respectively. In addition, two other invasive aquatic species, curlyleaf pondweed (*Potamogenton crispus* L.) and flowering rush (*Butomus umbellatus* L.) are present in Cabinet Gorge, Noxon Rapids, and Thompson Falls reservoirs (Table 1). The confirmed presence of Eurasian watermilfoil and other non-native invasive aquatic plants in Montana increases need and urgency to protect non-infested water bodies; and contain, control, and eradicate (where feasible) existing infestations.

Table 1: Acreage infested by non-native aquatic plants in Cabinet Gorge, Noxon Rapids, and Thompson Falls Reservoirs. (Madsen, Mississippi State University, August/2008).

Reservoir	Cabinet Gorge	Noxon Rapids	Thompson Falls
Curlyleaf pondweed	195	401	72
Eurasian watermilfoil	117	247	0
Flowering rush	0	46	28

Montana's Aquatic Nuisance Species Plan lists Eurasian watermilfoil as a "priority class 3" species with a high potential for invasion, and the plant is listed as a Category 3 noxious weed in the state. Management criteria includes public awareness and education, early detection, prevention of introduction to non-infested sites, and immediate action to eradicate pioneering populations.

The following activities have been conducted at Noxon Rapids and Cabinet Gorge reservoirs since Eurasian watermilfoil was first reported in 2007 to address the management criteria set forth in the Montana Aquatic Nuisance Species Plan:

1) A task force was formed to direct management of Eurasian watermilfoil and other invasive aquatic plants. The Task Force includes representatives of Sanders County Board of County Commissioners, Avista Utilities, Noxon-Cabinet Shoreline Users Coalition, Confederated Salish and Kootenai Tribes, Green Mountain Conservation District, Tri-State Water Quality Council, US Forest Service, Montana Department of Agriculture, Montana State University Extension/Sanders Co. and Montana Fish, Wildlife & Parks.
2) An aquatic vegetation inventory on Cabinet Gorge, Noxon Rapids and Thompson Falls Reservoirs was completed in August, 2008 by Dr. John Madsen of Mississippi State University;
3) 27,000 sq ft of barrier fabric was installed at high risk locations, including US Forest Service boat ramp sites;
4) A public informational meeting was held with stakeholders, local and state decision-makers, the general public and experts in the field of invasive aquatic vegetation in August 2008;
5) A statewide Eurasian watermilfoil plan is being written;
6) A public education program is being developed with funding from Montana Noxious Weed Trust Fund.

Research is needed to determine feasibility of including EPA approved and labeled herbicides as part of an integrated program to control Eurasian watermilfoil and curlyleaf pondweed. The purpose of this Environmental Assessment is to review the environmental effects of conducting a dye and herbicide research trial on Eurasian watermilfoil and curlyleaf pondweed on 40 acres in Noxon Rapids reservoir. The following describes the project in more detail:

a. The US Army Engineer Chemical Control and Physiological Processes Team will oversee and conduct dye studies to determine water flow characteristics prior to herbicide application. Research cooperators will include Dr. John Madsen, Mississippi State Univ., Dr. Kurt Getsinger and US Army Corp of Engineers.
b. Plots 1 through 3 are selected for the dye and herbicide study and are indicated on the attached maps. Plot 4 is a control point and will be monitored; however no dye or herbicide will be applied. All sites are located on Noxon Reservoir and are on Avista Utilities property. The plots are at the following locations:
    - Plot 1 - 115°42'33.89"W, 47°56'42.41"N within S3 and 10, T25N, R32W PMM
    - Plot 2 - 115°41'59.32"W, 47°52'52.51"N within S34, T25N, R32W PMM
    - Plot 3 - 115°37'20.65"W, 47°51'26.09"N within S7, T24N, R31W PMM
    - Plot 4 - 115°35'50.19"W, 47°51'9.83"N within S8 and 9, T21N, R31W PMM
c. Water-exchange will be measured using the inert tracer dye, rhodamine WT (RWT), approved for use by USEPA in surface waters, using fluorometric instrumentation devises. Dye applications will be conducted using a multi-depth water injection system (LitLine®, Clean Lakes Inc.), simulating an operational aquatic herbicide application

calibrated for maximum delivery to targeted submersed plant stands. This will provide estimate of herbicide contact time, and can be matched with herbicide concentration/exposure time (CET) relationships in order to select the herbicide application rates most likely to provide control.

d. A herbicide combination of systemic auxin (2,4-D or triclopyr) with endothall to control both Eurasian milfoil and curlyleaf pondweed will be used, since these two non-native invasive aquatic plants occur as mixed stands in the reservoirs. Herbicide application rates will be selected based on results of water-exchange evaluations, with treatment to occur within 24-48 hrs of water-exchange evaluations. Herbicide applications will be conducted using a multi-depth water injection system (LitLine®, Clean Lakes Inc.). Water samples will be collected and analyzed for herbicide residues to determine actual CET values in the plots (and link with efficacy), and to monitor dissipation of herbicides within, and downstream of, the plots.

e. Assess changes in plant communities at pretreatment (2009), 6 week post treatment (2009), and 52 week post-treatment (2010) using quantitative techniques developed by Madsen. A data report summarizing all aspects of the 2009 work will be developed by February 2010.

III. CONTENT OF THE ENVIRONMENTAL ASSESSMENT

The Eurasian Watermilfoil (EWM) Task Force prepared this scoping document to inform the public of the proposed Environmental Assessment (EA) and to seek additional public input. The EWM Task Force is aware of a number of issues and concerns that are listed below. The Task Force encourages public participation in the preparation of the EA and requests public input on those issues outlined in Section IV. Public input will help the EWM Task Force focus on significant issues and concerns related to the proposed research project and to select alternatives for analysis by the EA.

Alternatives considered in the EA include the following:

A. No Action – This alternative would take no action and would allow the Eurasian Water milfoil and curlyleaf pondweed to continue to infest and proliferate in the Noxon Rapids and Cabinet Gorge reservoirs with a significant potential to spread to other waterbodies in Montana.

B. Preferred Alternative. Conduct research on aquatic herbicide effectiveness on Eurasian watermilfoil and curlyleaf pondweed to determine use of approved herbicides as part of an integrated management approach.

IV. ISSUES TO BE DISCUSSED

The following issues and concerns have been identified by the Eurasian Watermilfoil Task Force on behalf of Sanders County Weed District through discussions and may be used as a general guideline for discussion at the scoping sessions. The EWM Task Force encourages submission by the public of additional issues pertaining to research project for consideration.

1. What areas are proposed to be treated?
2. What are the size of treatment areas and methodology proposed for the research project?
3. What are direct, indirect and cumulative impacts of the proposed research project?
4. What are the impacts of not controlling invasive aquatic vegetation?
5. What are impacts of quarantine on Noxon Rapids and Cabinet Gorge reservoirs?

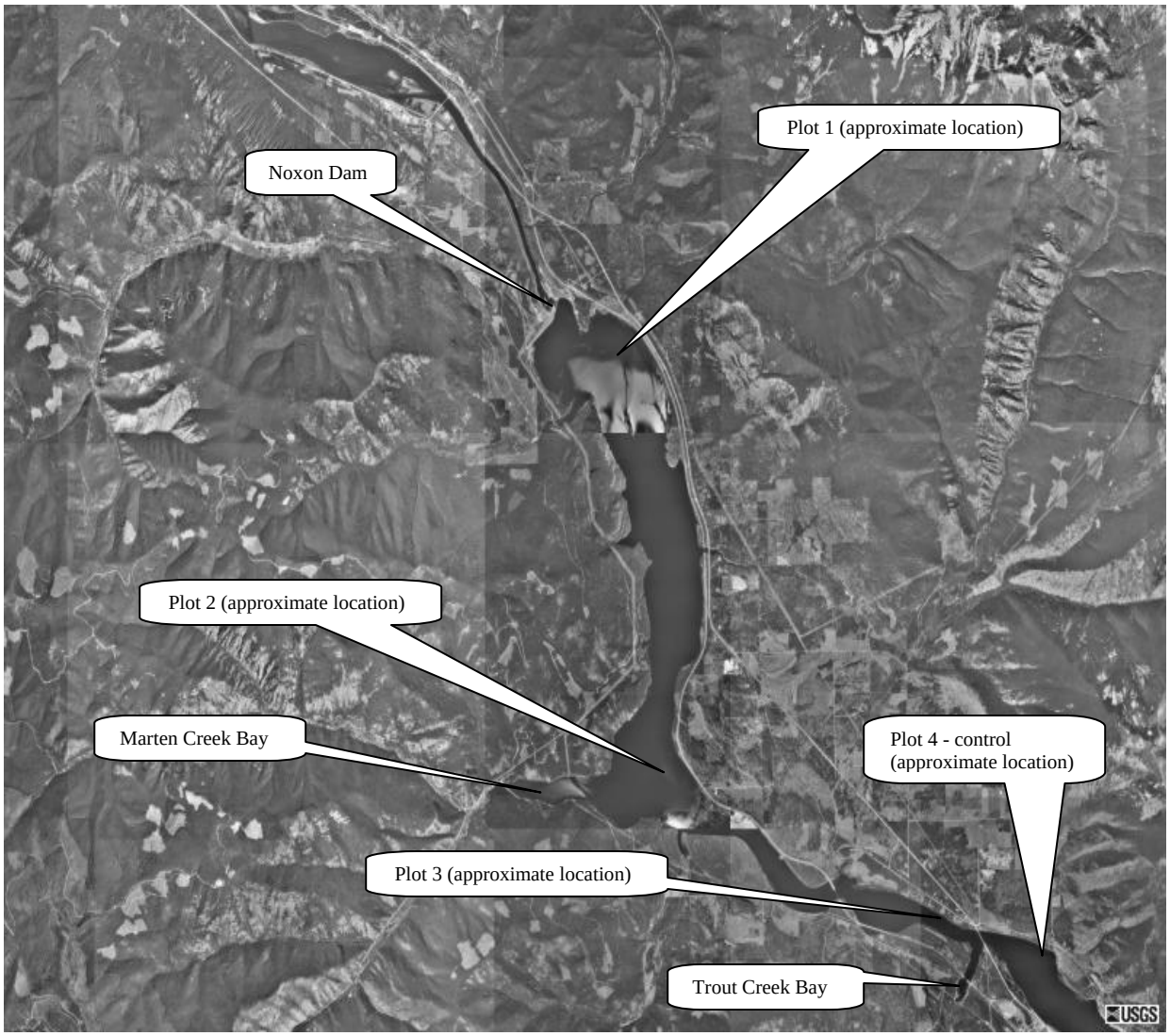
V. PUBLIC PARTICIPATION

Copies of this scoping document will be mailed or emailed to individuals, agencies and organizations on the EWM Task Force mailing list. The general public will be notified by legal notice in the Thompson Falls Sanders County Ledger http://www.scledger.net/ and The Missoulian http://www.missoulian.com The legal notice and this scoping document will also be posted on the Sanders County website: http://www.sanderscounty.mt.gov/ and the Noxon Cabinet Shoreline Coalition website www.ncshorelines.com The EWM Task Force will hold two open house style public meetings. The public meetings will be held on Monday March 16, 2009 in Noxon at the Emergency Services Bldg. at 401 Noxon Ave. from 1:00 – 3:00pm and in Thompson Falls at the Commissioners Conference Room in the Sanders County Courthouse at 1111 Main St. from 5:30 – 7:00pm. The purpose of these meetings is to help determine the scope of the EA and to identify issues to be addressed by the EA. Individuals providing verbal comments at the meeting are requested to provide a copy of their comments for the record. Written comments will be accepted by the EWM Task Force through March 31, 2009. Written comments at the meetings will be accepted, as well as e-mail or mailed comments directed to:

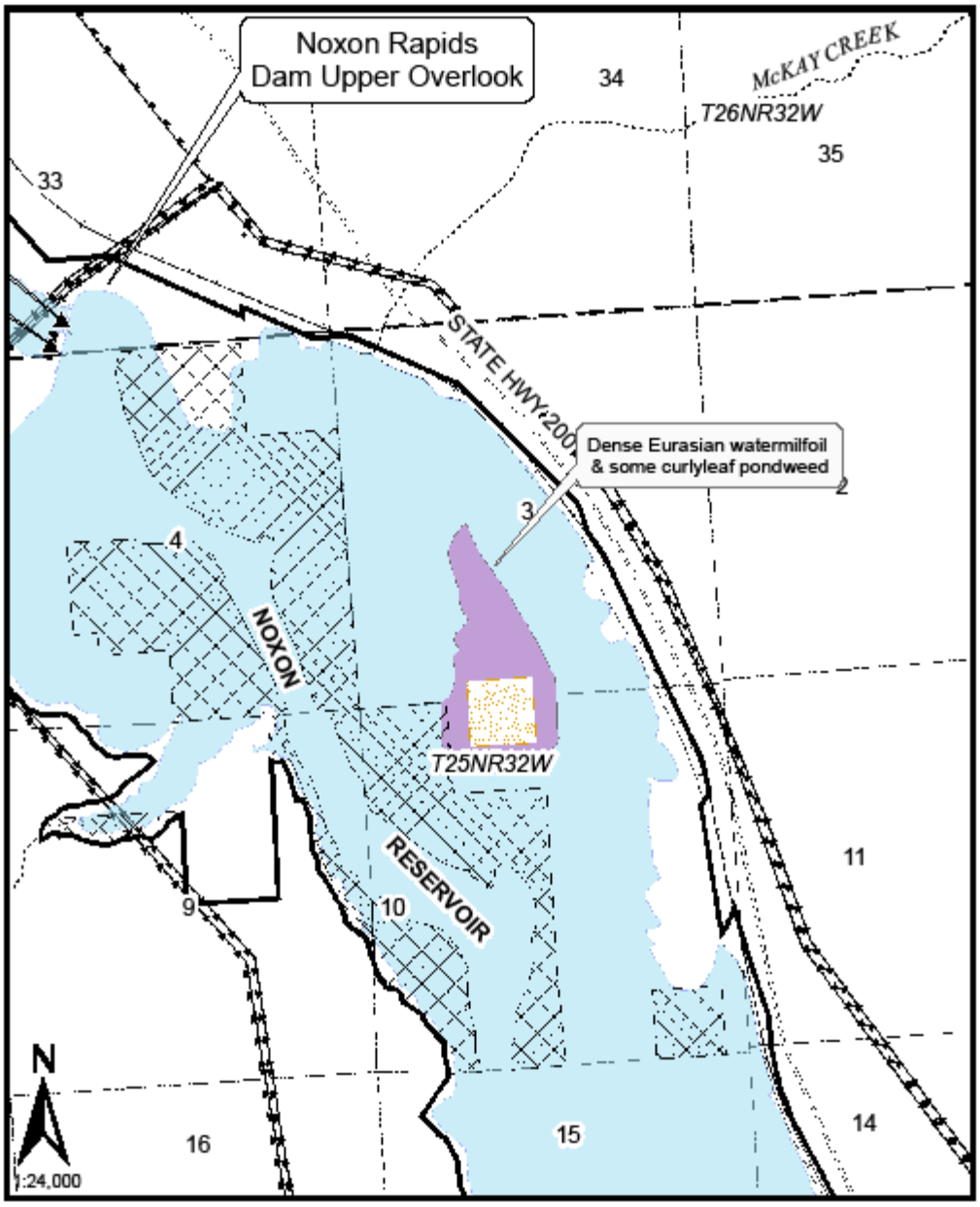
Eurasian Watermilfoil Task Force, c/o John Halpop,
2504 Tradewinds Way, Suite 1B
Thompson Falls, MT 59873
jhalpop@montana.edu

The meetings will be held to share information and receive comments related to the proposed research project in Noxon Rapids reservoir. A representative from the EWM Task Force will provide a brief description of the research project. There will also be a presentation on the EA process. After presentations, attendees will have an opportunity to speak with the EWM Task Force technical staff with expertise in various disciplines and to submit written comments. The EWM Task Force will make reasonable accommodations for persons with disabilities who wish to participate in one of the meetings or who need an alternative accessible format of this notice. If you require an accommodation, please contact, John Halpop at 827-6934.

A comment form is included at the end of this scoping document for your convenience.


Plot 1 (approximate location)
Noxon Dam
Plot 2 (approximate location)
Marten Creek Bay
Plot 4 - control
(approximate location)
Plot 3 (approximate location)
Trout Creek Bay
USGS

PLOT 1

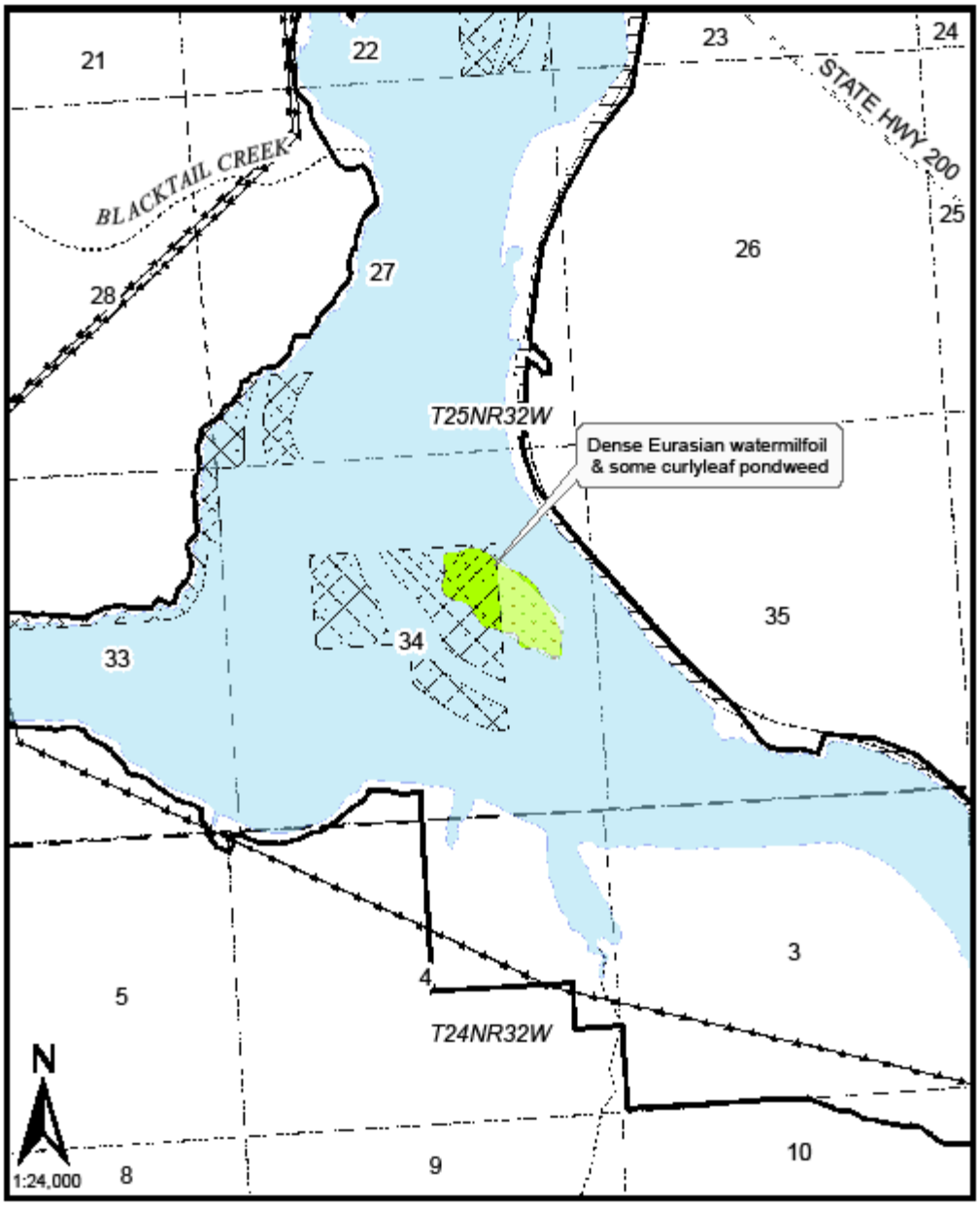


Forest Service Parcels

- KANIKSU/IDAHO PANHANDLE NATIONAL FOREST
- KANIKSU/KOOTENAI NATIONAL FOREST
- LOLO NATIONAL FOREST

- Plot 1 Aquatic Noxious Weed
- 20 Acres Treat Site
- Noxon Reservoir

PLOT 2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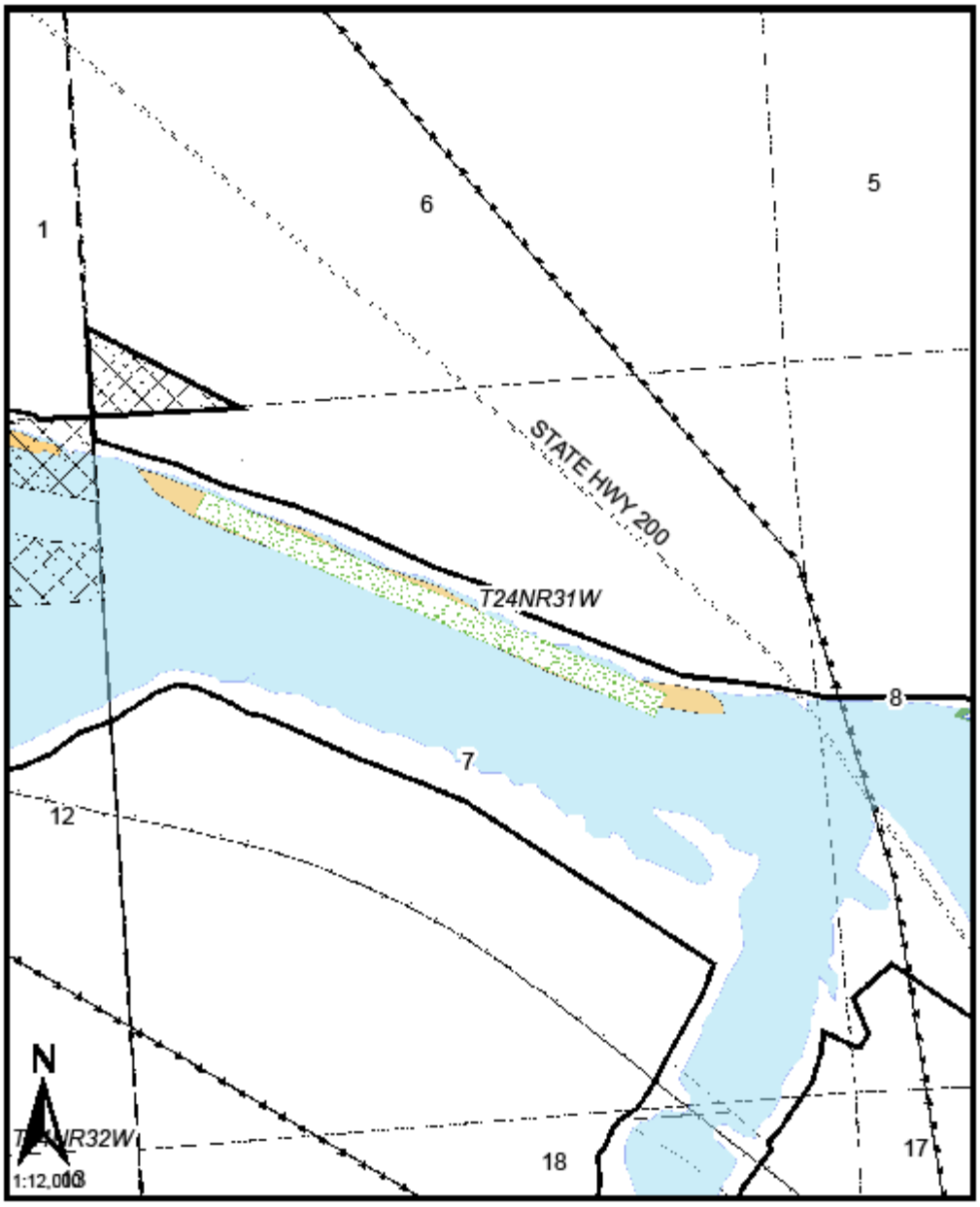
10
BLACKTAIL CREEK
STATE HWY 200
T25NR32W
T24NR32W
Dense Eurasian watermilfoil
& some curlyleaf pondweed
N
1:24,000
Forest Service Parcels
KANIKSU/IDAHO PANHANDLE NATIONAL FOREST
KANIKSU/KOOTENAI NATIONAL FOREST
LOLO NATIONAL FOREST
Plot 2 Aquatic Noxious Weed
17.8 Acres Treat Site
Noxon Reservoir

PLOT 3

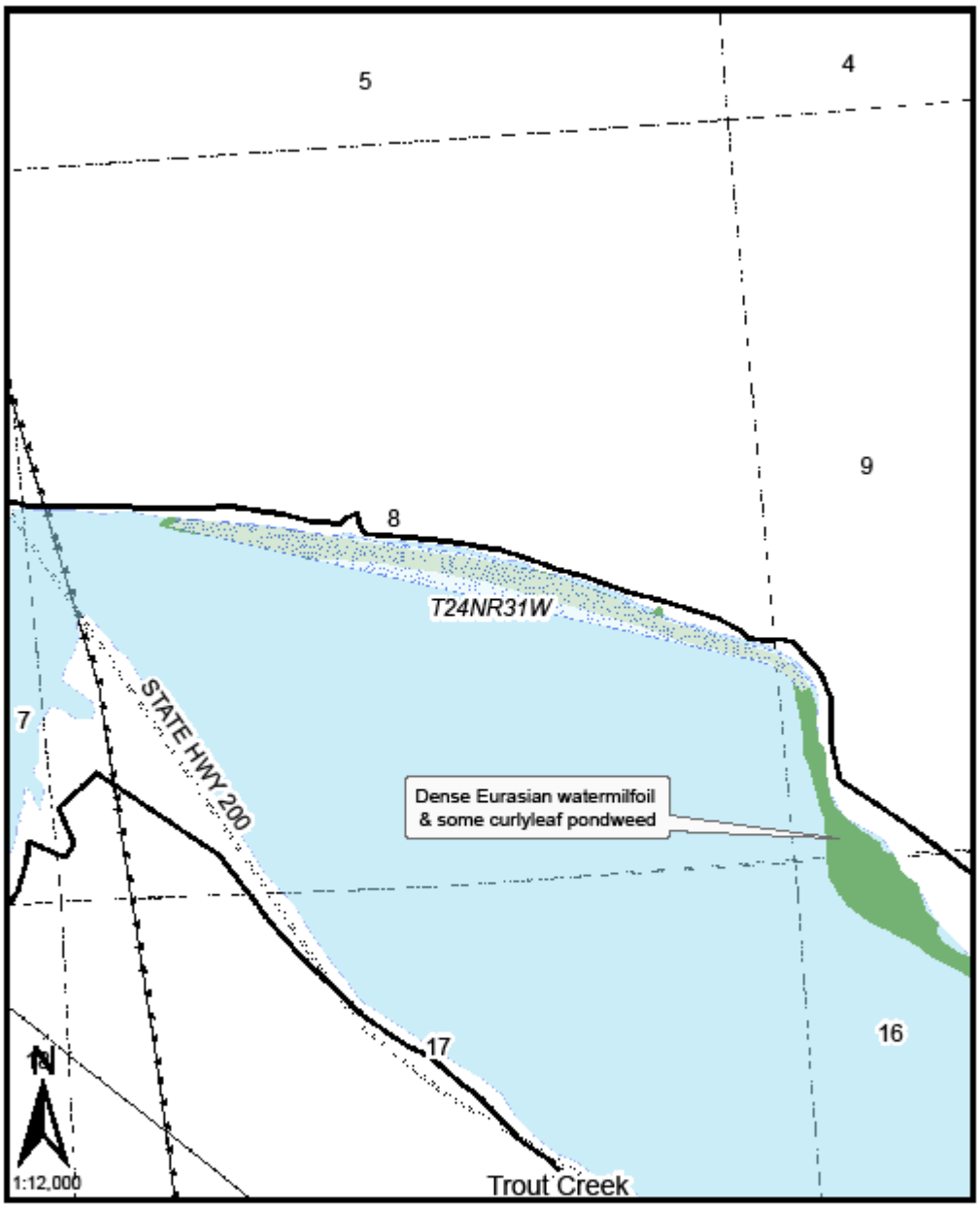


Forest Service Parcels

- KANIKSU/IDAHO PANHANDLE NATIONAL FOREST
- KANIKSU/KOOTENAI NATIONAL FOREST
- LOLO NATIONAL FOREST

- Plot 3 Aquatic Noxious Weed
- 14.8 Acres Treat Site
- Noxon Reservoir

PLOT 4



Forest Service Parcels

- KANIKSU/IDAHO PANHANDLE NATIONAL FOREST
- KANIKSU/KOOTENAI NATIONAL FOREST
- LOLO NATIONAL FOREST

- Plot 4 Aquatic Noxious Weed
- 20 Acres Control
- Noxon Reservoir

Eurasian Watermilfoil Task Force
Environmental Assessment for Herbicide and Dye Research Project
On Invasive Aquatic Vegetation In Noxon Rapids Reservoir
Public Comment Form

Thank you for your interest in this project. Please provide any comments or questions you would like addressed in the environmental assessment. You may submit your comments in writing on the back of this form and submit them either at the public meeting or by mail to the address specified on this form. Electronic comments can be sent to jhalpop@montana.edu

Please submit all comments by March 31, 2009. Submit additional pages of comments if needed.

Please fold in thirds, staple and affix postage.

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Affix Postage

Eurasian Watermilfoil Task Force, c/o John Halpop
2504 Tradewinds Way, Suite 1B
Thompson Falls MT 59873

Eurasian Watermilfoil Task Force Environmental Assessment for Herbicide and Dye Research Project On Invasive Aquatic Vegetation In Noxon Rapids Reservoir
Public Comment Form

Name:

Mailing Address:

E-mail Address:

Phone:

Optional: add me to your Eurasian Watermilfoil Task Force mailing list

☐ Yes ☐ No ☐ Already on mailing list for EWM Task Force

Alternatives Proposed: (please **check which you alternative you support and add comments below**).

☐ A. No Action – This alternative would take no action and would allow the Eurasian water-milfoil and curlyleaf pondweed to continue to infest and proliferate in the Noxon Rapids and Cabinent Gorge reservoirs with a significant potential to spread to other waterbodies in Montana.

☐ B. Preferred Alternative - Conduct research on aquatic herbicide effectiveness on Eurasian watermilfoil and curlyleaf pondweed to determine use of approved herbicides as part of an integrated management approach.

Submit additional pages of comments if needed.

Enter comments here: