



Environmental Assessment Decision Notice
for the
Canyon Ferry Wildlife Management Area
Agricultural Lease Renewals
Montana Fish, Wildlife & Parks
Region 3, Bozeman
March 2022

Preface

The enclosed Decision Notice has been prepared for the renewal of the six existing agricultural (farming) and the one existing bee yard (apiary) lease on the Canyon Ferry Wildlife Management Area. The Canyon Ferry WMA (CFWMA) is administered by the Bureau of Reclamation (BOR) and managed by Montana Fish, Wildlife & Parks (FWP) through a management agreement with the Bureau of Reclamation. FWP is proposing to renew the six existing agricultural leases and the one existing bee yard lease for seven (7) years (Jan 1, 2023 – December 31, 2029). The six agricultural leases comprise approximately 704 acres of irrigated cropland total which is approximately 11.9% of the total acreage of the CFWMA. The lessees are responsible for doing all of the work on their agricultural leases.

The agricultural leases provide food and cover for a host of wildlife species that utilize the CFWMA while also demonstrating that sustainable agricultural production can co-exist with wildlife and even benefit many wildlife species. Wildlife species that utilize the agricultural leases include waterfowl (Canada geese, a large number of duck species, etc), pheasants, white-tailed deer, mule deer, moose, occasionally elk and antelope, sandhill cranes and a variety of other nongame wildlife and bird species.

Public Process and Comments

FWP is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of a proposed action to the human and physical environment. An Environmental Assessment (EA) in compliance with MEPA was completed for the proposed action by FWP and released for public comment on February 1, 2022.

The following two alternatives were analyzed in the Environmental Assessment:

Alternative A: **No Action**. Under the No Action Alternative the agricultural leases on the CFWMA would not be renewed.

Alternative B: **Proposed Action**. FWP would renew the six existing agricultural leases and the one existing bee yard lease for 7 years (January 1, 2023 – December 31, 2029) – subject to Montana Fish & Wildlife Commission approval.

Public comments were taken for 30 days (through March 2, 2022). Legal notices were printed in the Bozeman Chronicle, Helena Independent Record, and the Broadwater County Reporter. The Environmental Assessment was also posted on the FWP webpage: <http://fwp.mt.gov>.

One individual submitted comments during the official comment period. The following is a summary of the comments received and FWP's response.

1. Individual questioned whether the proposed agricultural practices are sustainable. Individual felt that complete recycling of nutrients back into the soil needed to be occurring for practices to be sustainable and questioned whether or not that was occurring. Also felt that any fertilizer being used could be impacting the ecosystem.

FWP's Response: Farming has been occurring on all or at least most of the current agricultural lease areas since at least the mid-1950s prior to the establishment of the Canyon Ferry WMA (CFWMA) and have been maintained in agriculture production for approximately 70 years. FWP recognizes that not all nutrients are recycled into the soil when harvested crops are removed from the site. However, crop residue remains on the site, decaying and returning organic matter to the soils. Over time, soil health awareness has increased in the agricultural community. Resulting farming practices have changed to promote nutrient cycling and soil health. As such, at least one of the current lessees currently no-till farms on the CFWMA. In addition, approximately 50% of the cropped acreage on the CFWMA is irrigated alfalfa which is a nitrogen fixer. While fertilizer is allowed on those areas that are in wheat production, fertilizer practices performed by the lessees are applied according to product labels and in accordance with state laws.

2. Individual felt that the negative impacts on wildlife, of cancelling or buying out the leases, should be analyzed from a perspective going back before agriculture started. Individual felt that the agricultural practices altered the ecosystem and created a situation where wildlife are dependent on the crops now being produced and felt going back to a more natural ecosystem should be a higher priority than continuing with farming leases that provide artificial food for wildlife.

FWP's Response: There is a long history of the native ecosystem being altered in this area, and as mentioned above, the farmed agricultural lease areas on the CFWMA predate the existence of the Canyon Ferry Wildlife Management area, i.e. those areas were already farmland/agricultural land before the establishment of the CFWMA. The land that is now the CFWMA was altered prior to the establishment of the CFWMA, which included establishing Canyon Ferry Reservoir. Vegetation on CFWMA is comprised primarily of non-native plant species. Wildlife use of agricultural crops doesn't constitute animal feeding under state law. Migrating waterfowl, pheasants, and white-tailed deer make extensive use of domestic hay and small grain croplands because of their nutritional value. Waterfowl use croplands opportunistically to help fuel migration, molt, and nesting activities (Ringelman 1990). Ring-necked pheasants are an exotic game bird that requires waste grain from agricultural fields and other sources to survive and thrive in northern states like Montana (Flake et al. 2012). Irrigated hayfields are a magnet for white-tailed deer. In addition to the nutritional value, providing these fields on CFWMA at times helps reduce depredation on neighboring properties. In the past, FWP has retired portions or entire agricultural leases to establish a better integration of wildlife cover and cropland for overall improved habitat productivity.

3. Individual felt that there were contradictory statements in the draft EA regarding impacts on land resources under the analysis of Alternative A. Statements were that the soils would be less productive and the amount of cover would be reduced while also stating that an increase in plant diversity and species abundance would likely occur.

FWP's Resonse: Under the no action alternative (leases discontinued) the soils on the leases would no longer be irrigated which would reduce the annual amount of vegetation production (tons per acre) given that the annual

precipitation in the area of the CFWMA is only around 10" of moisture a year. Since those areas would no longer be actively managed for and planted to irrigated alfalfa and wheat, FWP recognizes that over time, other plant species would colonize and occupy these sites. This would indeed result in an increase in plant diversity and plant species abundance. However, because of the plant species that dominate most of the CFWMA, most plants that would take over the formerly cropped areas would be non-native species including annual agricultural weeds, noxious weeds, and smooth brome grass.

4. Individual questioned the statement under the analysis of Alternative A that an increase in plant diversity would likely not be beneficial to the wildlife that had become dependent on crops.

FWP's Response: As mentioned above, the plant species that would establish in the cropped areas over time, if they were no longer farmed, would likely be non-native species. Herbaceous vegetation on the CFWMA is currently dominated by non-native invasive species such as reed canary grass, smooth brome, crested wheatgrass and whole variety of agricultural weeds including noxious weeds. Much of the noncropped herbaceous vegetation on the CFWMA has very little value to many of the wildlife species that utilize the CFWMA. Some species such as pheasants may make use of some of the annual weed species for food and cover.

5. Individual felt that the statement under the Alternative A analysis that an increase in bare soil potentially leading to more erosion was contradictory to a note that said the topography was very flat and there is little to no runoff.

FWP's Response: The statements in reference are not in contradiction, as an increase in bare soil could lead to an increase in wind erosion, while the statement related to the topography being flat with little runoff was in reference to the potential for water erosion.

6. Individual agreed that weeds are an issue, but that they were probably introduced by farming.

FWP's Response: Some of the weed species present on the CFWMA may have been brought in as a result of agricultural practices that occurred in that area prior to the establishment of the CFWMA. However, a good portion of the CFWMA is often flooded on a periodic basis when the Army Corps of Engineers fills Canyon Ferry Reservoir into its flood pool stage – a good portion of the CFWMA is contained within that flood pool. As a result, weed seeds in that water from the entire upper Missouri River watershed are deposited on the CFWMA. Weeds are also spread around the CFWMA by wildlife, as well as by humans and their pets.

7. Individual felt that seeing farming operations on a WMA was objectionable and not aesthetically pleasing and that seeing a WMA in its natural condition was aesthetically pleasing.

FWP's Response: The viewpoint of the commentor that some individuals do object to farming being done on FWP WMA's and that it is not aesthetically pleasing to some individuals should have been reflected or noted in the EA and that will be corrected in the final EA.

8. Individual felt that FWP should not be promoting and supporting nonnative species and that FWP across the board should be working to remove all nonnative species, especially if they were introduced on purpose.

FWP's Response: The individual didn't mention which nonnative species were being referenced, but nonnative wildlife species such as pheasants, Hungarian partridges, and Merriam's turkeys are all found on the WMA. While these species are not native to Montana, these species have become naturalized to the state. These species are state game birds by statute and as such, are actively managed by FWP and are extremely popular with hunters and the wildlife viewing public.

9. Individual felt that all incompatible uses should be gradually phased out over time and that the Department's long term goal shouldn't be to try and prolong incompatible uses, but to gradually phase them out so the public land unit eventually achieves ecological integrity.

FWP's Response: FWP believes that agricultural (farming) leases are a compatible use of the CFWMA, as agriculture enhances productivity of the WMA.

Cited Literature

Flake, L.D., A.E. Gabbert, T.R. Kirschenmann, A.P. Leif, and C.T. Switzer. 2012. Ring-necked pheasants: thriving in South Dakota. South Dakota Department of Game, Fish and Parks. Pierre. 254 pp.

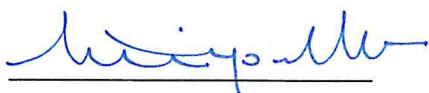
Ringleman, J.K. 1990. Managing agricultural foods for waterfowl. In Waterfowl Management Handbook, Fish and Wildlife Leaflet, US Fish and Wildlife Service. 258 pp.

Decision

It is my decision, based on the Environmental Assessment and the results of the public comment process to recommend approval of the Proposed Action (Alternative B) of renewing the six existing agricultural (farming) leases and the one existing bee yard lease for 7 years (January 1, 2023 – December 31, 2029). If approved by the Fish & Wildlife Commission, lessees would be given the choice of either a cash lease or a payment in-kind lease (payment is in services rendered in lieu of a cash lease payment) for the new seven (7) year leasing period. The bee yard (apiary) lease is proposed to be set at \$175.00/year for the 7-year lease period.

Renewing the six existing agricultural leases and the one existing bee yard (apiary) lease on the CFWMA would provide many positive benefits to both wildlife and the community. The agricultural leases demonstrate that sustainable agricultural production can co-exist with wildlife and even benefit many wildlife species. Managing a portion of the CFWMA as agricultural leases provides positive benefits (winter food plot set-asides, bird nesting cover for most of the nesting season, irrigation of existing shelterbelts which provide wildlife cover, potential for lessees to do other habitat improvement work) for a variety of wildlife species that utilize the CFWMA, and it also helps maintain a good relationship between FWP and the local community.

The analysis did not reveal any significant impacts to the human or physical environment as a result of the project. I therefore conclude that the Environmental Assessment is the appropriate level of analysis, and that an Environmental Impact Statement is not required.



Marina Yoshioka
Region 3 Supervisor
Montana Fish Wildlife & Parks

3/24/22

Date