Montana Fish, Wildlife & Parks

Region 1
490 N. Meridian Road
Kalispell, MT 59901

5-Year Farm Lease
North Shore Wildlife Management Area
Decision Notice

June 22, 2016

Description of the Proposed Action

The North Shore Wildlife Management Area (WMA) was acquired to protect surface and groundwater quality and wetlands on and near Flathead Lake. The property is managed to conserve and enhance habitats that provide forage and habitat for migratory waterfowl and upland game birds, while also benefiting a variety of nongame wildlife, and to promote public hunting and other compatible wildlife-related recreational opportunities.

To address these goals, Montana Fish, Wildlife & Parks (MFWP) has contracted with local farmers to plant and manage grain on the property, leaving a minimum of 15% of the crop standing in lieu of payment. These contracts allow MFWP, at no cost to the agency, to create vital food resources for migratory waterfowl and upland game.

MFWP proposes to lease approximately 359 acres of the 429-acre property for a period of five years for the purpose of increasing wildlife cover and forage.

Public Involvement

The 5-year Farm Lease of the North Shore Draft Environmental Assessment (EA) was released for a 23-day public comment period on May 27, 2016. MFWP ran legal ads in the Daily Inter Lake, a regional newspaper, and the Flathead Beacon describing the proposed project and the availability of the draft EA. The draft EA was posted on MFWP's official web site. MFWP also issued a press release that described the project, availability of the draft EA, and the public comment timeline.

Summary of Public Comments

MFWP received 6 letters or emails in support of the proposed project. Supporters stated their approval for the project because it would benefit wildlife, particularly waterfowl and upland game, the local agrarian economy, and public recreation. One of the written comments also encouraged MFWP to

continue land protection efforts along the North Shore of Flathead Lake and to pursue native grassland restoration on the WMA. FWP received 2 comments expressing concern that the 5-year lease period is too long, and one of those also commented that a 15% share for the state is too low. FWP received one comment proposing a third management alternative calling for grass and shrub planting goals of 10 acres annually to benefit upland game birds and annual farm lease renewals until such time that a restoration plan is developed for the property. Comments and MFWP's responses are below.

1. **Comment about restoring native grassland.** We received a suggestion to continue land protection efforts and pursue conservation partnerships to protect additional properties along Flathead Lake's North Shore and to include native grassland restoration as part of the future management of the property, including adding in native grasses and forbs/wildflowers, as well as including paved/gravel trails around the restoration area to enable use of fire and to restrict root invasion by nonnative grasses and other species. Are there grants for this type of restoration?

   MFWP Response: Working with area partners, MFWP will continue land protection efforts throughout the region and along Flathead Lake's North Shore to identify conservation opportunities and secure funding to implement priority actions.

   Our future restoration plan for the North Shore WMA will includes restoring uplands as well as wetlands. As stated in Objective 3 of the property Management Plan, we propose to ***"maintain/ enhance and possibly gradually expand native upland habitat, e.g., intact ponderosa pine stands with native understory."*** Although we appreciate the suggestion for native grassland restoration in theory, we do not currently plan to implement complete native grassland restoration at this time for a number of reasons.

   First, based on our experience and the experience of others, restoring the full native grassland ecosystem complete with the native grasses, forbs, and wildflowers, along with natural ecological processes (e.g., fire), is extremely difficult and expensive to implement and maintain at this scale over the long run. The problems of native grassland restoration are that native species cannot out-compete invasive and nonnative grasses and noxious weed species. This property and the general Flathead Valley are heavily populated by invasive, nonnative, sod-forming grasses (e.g., reed canary, quack grass, timothy), as well as numerous species of noxious weeds. Secondly, it is particularly hard, if not impossible, to maintain native forbs on a substantial acreage because noxious weeds tend to either establish first or gradually take over. Unfortunately, one cannot spray the noxious weeds without killing the native forbs/wildflowers, and pulling and managing weeds by hand is cost-prohibitive. Native grasses are also difficult to establish for many of these same reasons; however, once established they can persist for some time and aren't killed by typical noxious weed spraying. Even maintaining native or native-like grasses may require repeated planting efforts and ongoing maintenance to prevent nonnative takeovers.

As described in the Management Plan, MFWP is committed to trying to restore primarily native grasses (without the native forb/wildflower component) along with native shrubs and tree species because we believe this approach will be most successful for two reasons: (1) much of the land has been in grain production and should have a reduced seed bank that would compete with the native grass species, and (2) we will be able to promote native grass establishment by managing noxious herbaceous weeds using traditional methods, such as through the limited and careful application of appropriate herbicides. Should our attempts at native grass restoration fail, we may need to incorporate native-like species (pubescent or tall wheatgrass) that can better compete with nonnative invasive species and weeds and yet will also provide nesting and cover qualities for a variety of wildlife species. Adding in the complexity, costs, and risks associated with planting/establishing native forbs and wildflowers into this restoration project would be costly, limit management options, and require extensive maintenance.

Restoration of a complete native grassland ecosystem on a very small portion of this property is clearly not precluded by the proposed lease and could be possibly incorporated into management over time. We are not aware of any grants for native prairie restoration at this time, but we would be interested in any proposals from partners who are willing to take the lead to fund establishment and maintenance of native grasslands on a portion of this property.

2. **Comment about lease duration.** MFWP received a telephone inquiry expressing concern that a 5-year lease may be too long a period given the rate of habitat loss within the Flathead Valley and the need, therefore, to aggressively restore habitat to offset losses.

   MFWP Response: Leave crops and food plots left in lieu of payment provide important food and cover for wildlife – resources MFPW is unable to sustain without sharecropper assistance. Lease duration is an important attribute of lease value. Providing a lease term of sufficient duration maximizes MFWP return and incentivizes the lessee to manage for long-term productivity. Maintaining soil health, controlling invasive species, and establishing healthy and diverse buffer strips all require a several-year commitment. With a shorter duration lease, MFWP anticipates reduced lessee commitment to maintaining property productivity.

   As stated on page 2 of the draft EA, MFWP anticipates reducing crop land area by as much as 92 acres during the 5-year lease agreement period as habitat restoration projects are implemented. When fully implemented, over a third of the WMA would be managed to provide native upland and wetland habitats. The 5-year lease agreement will stipulate the potential for this conversion via habitat restoration. Regardless, agriculture will always remain an important facet of habitat management at the North Shore WMA to provide those important food resources.

3. **Comment about lease duration and 15% minimum crop share.** MFWP received a comment expressing concern that if a management plan for the property is not complete, a 5-year "firm" agricultural lease is premature. The individual also commented that they receive a 50% crop share

on hay and grain fields they lease in eastern Montana, and that a 15% MFWP share at the North Shore WMA is inadequate.

MFWP Response: A management plan is in place for the North Shore WMA that calls for a mix of cover and agriculture on the property. Regardless, MFWP recognizes the concern expressed that a 5-year lease would unduly limit or delay management options. As stated on page 2 of the draft EA, MFWP anticipates reducing cropland area by as much as 92 acres during the 5-year lease term to accommodate implementation of habitat restoration projects. Lease agreements will be written to provide this flexibility and the annual review of cultivated areas vs. plans for restoration. Prior to initiating restoration, a comprehensive property restoration plan will be developed and released for public comment through the environmental review process.

In regard to terms of the lease agreement, the sharecrop opportunity is bid competitively with the 15% state share a stated minimum. In addition to leave proportion, proposals are evaluated on their commitment to a number of best management practices (BMPs) geared toward improving: (1) wildlife habitat (e.g., crop type, stubble height, etc.), (2) long-term agricultural productivity (e.g., crop rotation schedule, soil organic matter augmentation, etc.), and (3) environmental benefit (no-till methods, reduced herbicide/pesticide application schedule, buffer strip, and food plot plantings and maintenance, etc.). Negotiated terms are directly related to the attractiveness of the opportunity and the competitiveness of the bidding process. Enhancing the public's share is one of our explicit rationales for proposing a multi-year lease for the WMA.

4. **Comment about lease duration and proposed management alternative.** MFWP received a comment that the two management alternatives (preferred and no-action) failed to articulate measurable habitat improvement goals or provide assurances for habitat enhancement. To remedy this, the individual proposed a third alternative, one establishing an annual habitat enhancement goal of 10 acres per year through planting grasses interspersed with shrubs to benefit upland game birds. An initial restoration goal of 100 acres is suggested and recommendation that agricultural leases be renewed annually until such time that a comprehensive restoration plan is established.

   MFWP Response: As stated in the property Management Plan for the North Shore WMA (November 2013), enhancing and restoring native riparian, wetland, and upland habitats for wildlife are primary management objectives. In addition, the plan recognizes the important wildlife habitat contribution of active agriculture (food and cover). This draft EA evaluates the impacts and options for perpetuating agricultural activity on the North Shore WMA and the associated wildlife benefits. In acknowledgement of MFWP's accelerated restoration timeframe for the property, the draft EA highlights that as many as 92 acres will be taken out of agricultural production during the 5-year lease period to accommodate restoration (page 2). Together with the existing native cover (70 acres of uncultivated land), habitat restoration and management stands to improve 172 acres of the North Shore WMA within the next five years, upwards of 1/3 of the 429-acre property. MFWP is planning to consolidate and update the three management plans that currently cover the property over the

coming fall and winter. That process will include reaching out to potential partners and soliciting additional public input on management goals for this property.

MFWP is currently on track to restore more acres more quickly than the alternative 10-acre per-year plan proposed by the commenter. At the same time, a multi-year lease will provide both the flexibility to implement restoration and the means to secure sound stewardship of the property's cropland.

MFWP Final Decision

In reviewing all the public comments and other relevant information, and evaluating environmental effects, I hereby recommend the Commission approve the 5-year agricultural lease of 359 acres of the 429-acre North Shore Wildlife Management Area.

Through the public review process described above, MFWP found no significant impacts on the human or physical environments associated with this proposal. Therefore, the EA is the appropriate level of analysis, and an environmental impact statement is not required.

Noting and including the responses to public comments, this decision notice together with the draft EA will serve as the final document for this proposal. MFWP believes a farming lease is in the best interest of waterfowl conservation in the Flathead Valley. It will also provide opportunities to manage and improve habitat for wildlife, and it will provide recreational opportunities for the public.

Jim Williams
Regional supervisor

6/23/16
Date