

SUMMARY MONTANA WETLAND COUNCIL MEETING
Wednesday February 6, 2002
9:30 am – 4:00 pm
DEQ Directors Conference Room, Helena MT

Note: The next Montana Wetland Council meeting will be scheduled for mid-summer.

Welcome and Introductions

Department of Environmental Quality Wetland Coordinator, Lynda Saul, welcomed attendees to the Montana Wetland Council meeting and asked all in attendance to introduce themselves (please see attached sign-in sheet). This Council meeting focuses on recent changes to wetland regulations. The last Council meeting concentrated on Montana's amphibians and aquatic reptiles and their habitat needs. Meeting summaries were sent and copies are still available.

State Wetland Regulatory Programs and Issues.

Lynda Saul presented information on pre-SWANCC state wetland regulatory programs: 15 states had regulatory programs for isolated freshwater wetland protection, another 10 states had regulatory programs for freshwater wetland adjacent to tributaries. The U.S. Supreme Court decision (1/9/01) in SWANCC vs. US Army Corps of Engineers (COE) ruled against federal jurisdiction over an isolated wetland with ties to interstate commerce based on the Migratory Bird Rule. A continuing lack of federal guidance on the SWANCC decision has many frustrated with COE and EPA. Estimates range that from 40 - 80% of the nations wetlands would no longer be covered by the Clean Water Act Section 404 program due to the SWANCC decision. Estimates depend upon how the terms 'adjacent', 'tributary' and 'hydrologically connected' are defined. Several states acted quickly to address the regulatory gap left by SWANCC. Eight states have new legislation, policy or rules in place and another six states are currently working on state options.

Implications to the SWANCC decision in Montana have focused largely on the prairie pothole regions. An estimated 2.7 million potholes occur in Montana, North and South Dakota. 87 percent are considered small (temporary or less than one acre) and all are critical to breeding waterfowl and production of young. Other types of wetlands which occur in Montana that may no longer be subject to the COE 404 program (dredge and fill) include: wet meadows, seeps and springs, fens, many forested wetlands, lake and riparian fringe wetlands, impacts from SWANCC on these wetland types has not been investigated. COE is responsible for jurisdictional determination and everyone is waiting for additional guidance.

A few web resources for more information about SWANCC include:

<http://cnie.org/NLE/CRSreports/Risk/rsk-56.cfm>. CSR Report for Congress.

<http://www.aswm.org/swancc/aswm-int.pdf>. ASWM paper on SWANCC decision.

The Farm Bill currently working through Congress is important to wetlands for two reasons. First, the Swampbuster provisions provide disincentives to landowners to convert wetlands for agriculture production because certain farm program subsidies are denied. Second, the conservation provisions in the Farm Bill provide financial incentives and restoration programs to landowners. The Farm Bill and Section 404 have provided complimentary wetland protection. Pointed out that other activities impacts wetlands such as flooding, clearing vegetation, draining, changing nutrient levels, introducing toxins and disrupting natural plant and animal populations. While physical loss of wetland has been reduced to about 117,000 acres per year nationally, quality impacts are reducing the natural functions of many of the nation's wetlands. Montana is just beginning development of a wetland monitoring and assessment program to determine the quality of the state's wetlands.

Update since the Council meeting: Farm Bill Passes Senate 2/13/02

The US Senate has completed work on their version of the Farm Bill. S.1731 passed with a 58 to 40 margin. Actually what they passed was "H.R. 2646 As Amended." That included what was in S.1731, as amended, several specific amendments and a "manager's amendment" consisting of a compilation of non-controversial amendments. A good chronology of what the recent bill has gone through in the Senate is at http://www.privatelands.org/farm_bill_US_Senate_2001-2.htm.

Montana's Wetland Regulations and Enforcement Procedures.

Jeff Ryan, DEQ Water Quality Specialist discussed Montana's current wetland regulatory authority through Clean Water Act Section 401 certification and DEQ violation and enforcement procedures. Section 401 certification of the Clean Water Act mandates that the state has authority to look whether federal permits will adversely affect Montana's water quality standards. There are three types of standards. The standards involve maintaining drinking water, swimming, fishing, agriculture and industrial water supplies. 1) Numeric standards, WQB7 <http://www.deq.state.mt.us/wqinfo/Circulars.asp>. 2) Narrative standards. 3) State non-degradation policy. These standards are used to allow a 401 permit or deny it. Can put stipulations permit to meet 401 compliance such as lowering a culvert to allow for fish passage.

DEQ enforcement program with regards to wetland and other areas was described as follows: Enforcement response manual empowered enforcement division within DEQ. Complaints come into DEQ, or other state agency and are directed to our agency. Take information and check the validation of the complaint. Write up inspection report and decide what program will address the problem. Will notify the party of what needs to be done to bring it into compliance. Try to direct the violator to bring the violation into compliance. Usually assign a time frame to allow for this to happen. If violator is not willing to comply then it is sent to enforcement for action. Demand reclamation with monetary fines for non-compliance and then order may be made legally that will force compliance.

The following summarizes the questions and discussion which ensued:

1. How is the state planning to protect wetlands? What authorities do the state have?
Mixed opinions, DEQ struggling with SWANCC. In some cases violations can be identified. Such as dumping waste into a pothole.
2. What mechanism is used for enforcement?
Federal permits need state 401 certification, either federal agency or applicant can apply directly for certification.
3. Do state water quality standards define wetlands as part of the state waters?
'Wetland' is explicit in non-degradation standard but not explicit in others.
'State water' is defined in the Water Quality Act
<http://www.deq.state.mt.us/wqinfo/Standards/WaterQualityAct.pdf>.
4. What is a 'state water'? Drainage ways are state waters. What if completely grassed in? In theory, a permit will be needed. If it affects entering state waters.
5. Sediment added to water is a pollutant. What if sediment is removed? Is there anything relevant to that in change of water quality? Could have a violation occurring due to erosion that can cause turbidity in the water. Final decision would have to be referred to legal.
6. Section 318, muddy water permit? The person has to do activity in a manner that turbidity is minimized or avoided.

In summary, DEQ legal section is working on some of these types of questions related to wetlands and the SWANCC decision and the Montana Water Quality Act. The Montana Wetland Council would like a presentation at the next meeting by DEQ legal section.

Changes to Corps of Engineers (COE) Regulatory Wetland Programs.

Jean Ramer, COE Project Manager, Helena Regulatory Office explained that they are still struggling with the outcome of SWANCC as to what aquatic resources the COE has regulatory authority over. They do know that migratory bird use does not qualify the water body for interstate commerce. But other commerce connections exist and are still valid such as industrial, agricultural and recreational navigation "if it floats a boat" describes what types of wetlands are still jurisdictional. Most of the wetland tributary's and navigable waterways are still under jurisdiction. The COE now has to look at the landscape context. Jurisdictional calls are taking a lot longer now. If wetland is isolated it will probably not be jurisdictional, if it is adjacent to, it may be. Adjacent is neighboring, bordering or contiguous. Lots of gray areas, COE needs additional guidance. COE is directing consultants/ project proponents to inventory (map, delineate) the aquatic resources in the area, COE is responsible for jurisdictional calls. Council questions include:

1. If it is adjacent to ground water what is the definition or criteria used? Is there a standard? Surface connection to surface water may be a standard. But a lot is still not clear.

2. Is the 100-year flood plain area still used? This is now in question. Wetlands within the 100 year floodplain may not be considered jurisdictional simply because they are in the 100 year floodplain. They must be considered adjacent in order to be jurisdictional.

If you look at where the potholes are some are protected others aren't, not a lot of new development or farming activity. Wet meadows or sub-irrigated ground is type where SWANCC will call jurisdiction into question the most. For example Bozeman area, but most wetlands are adjacent to other tributaries. COE has to be concerned with both surface connection and distance. Isolated lakes may also be affected by SWANCC.

3. Given our knowledge at this point, surface connection would be a regulated, what if there is no connection through the year? It would then be considered isolated regarding the amount of feet it is from surface water. Adjacent issue is still not clear. No formal guidance. Isolated waters have to be recreationally navigable to fall under jurisdiction.

4. Have the governing forces taken a position on this yet? Not that anyone is aware of.

The Montana Regulatory Office web address is:

<http://www.nwo.usace.army.mil/html/od-rmt/mthome.htm>

Wetland mitigation guidance. COE headquarters distributed a 10/31/01 letter that described the COE mitigation guidance. Priorities were acre for acre replacement of disturbed wetlands. Guidance letter expanded the COE options, to approve mitigation farther from the site, and include functional replacement. The new guidance includes more options and affects transportation more than anyone else. The intent was to allow flexibility on how field office could negotiate mitigation. Also to develop some standards for meeting mitigation obligations, such as revegetation. The Mitigation Regulatory Guidance Letter (RGL 01-1) follows:

http://www.usace.army.mil/inet/functions/cw/hot_topics/rgl01_1.pdf

Questions about mitigation guidance include:

1. Is Montana ready to take on this new mitigation? The COE has already gone here so they feel that they are prepared to do this. General guidance is there but the options are greater. RGL has been formalized. Montana mitigation policy will be a priority in the future. A public review will be included. It will also be done through all state agencies.

2. What about monitoring of the projects in the future? Monitored for 5 years is the present standard. Success will also be determined for mitigation. Defining these criteria will be important for mitigation. Presently this has to be shown in the 5 years.

EPA's Wetland Program Including Enforcement Responsibilities.

Kris Knutson, EPA Environmental Scientist, described EPA's role for enforcement of the Clean Water Act 404 program which regulates the discharge or fill dumped into waters of the U.S. Avoiding adverse impacts is the responsibility of the permittee. An enforcement memorandum of agreement between the EPA and the COE spells out responsibilities. The COE will enforce violation of their permit. Repeat violators or COE recommendation will have EPA take enforcement action. Letter of notification of violation will be sent, conduct inspections, ask questions to gather information and set time frame for response, some will comply and end it there, some will have to be given instruction for compliance and given a time frame to comply or a fine may be assessed. (Administrative penalty order) This may be negotiated. Some may go as far as Department of Justice in Washington DC for litigation.

Questions:

1. How many cases? Kris has been in this position for 4 months and is working on 15 civil cases dealing with wetlands in that time frame.
2. What is the criterion that distinguishes between civil and criminal? Criminal would be an intentional violation and would be decided by the investigator or lawyer. EPA has two criminal investigators assigned to Montana that deal with this.
3. How many cases are out there? Not known
4. Violation fees typically are non-directed. Does the EPA support the violation dollars going to the wetlands programs? It's possible that the violator would have to fund projects. Would have to be looked at.

SWANCC. A lot of areas under discussion. Interpretation still needs to be done. Only formal guidance was 1/19/01 joint EPA/COE letter. EPA interprets the Supreme Court decision as a statement that waters within state boundaries should be dealt with as a state matter, not a federal one. Question: What is EPA doing to bolster states ability to protect wetlands that have weak or no state authority? Is EPA doing anything to address the leadership in states that don't have plan for the SWANCC decision? EPA is concerned, encourage the public to make comment.

An Evaluation of 404 Wetland Permits in the State of Montana.

Janet Ellis, Montana Audubon, has a contract with DEQ to review of the Army Corps of Engineer's 404 permitting program. This would be an update to the Audubon's 1993 COE report and includes the period 1/1/90 to 12/31/01. It's a citizen's guide to the COE permit program and is a paper review, meaning there are no on-site visits to determine if the projects were built as permitted. COE 404 permits include: individual permits, nationwide general permit, and regional or state general permit. Individual permits: 358 issued in Montana, the largest category is for bank stabilization, totaling over 28 stream miles. Nationwide permits: 44 types of permits for different activities used nationally, 34 are used in Montana. Again in Montana the most frequent permit is for bank stabilization.

A previous DEQ contract with NRIS created a user-friendly searchable database of all 404 permits issued by the COE since 1990. It's updated regularly and provides geographic location of nationwide permit activity and either acres of wetlands impacted or linear feet of streams impacted. You can get a list of projects and select detailed information on a project or you can get summary information, also provides maps of the projects. Includes total acreage that was permitted (authorized), but has no information on denied permits. There are some shortcomings in the database, such as only about half the permits included an impact area analysis, so many times this information is left blank in the database. The final report may extrapolate information, if so, it would be well documented. This database will help to evaluate long-term and cumulative impacts of the 404 program on Montana's streams and wetlands.

<http://nr.is.state.mt.us/mapper/Corp404/CorpMain.asp>.

Questions:

1. Did the total come off the NRIS database? The totals do not match the COE database. After discussion with the COE, Audubon and others, the databases need to be reviewed to determine accuracy.
2. Do permit 29 totals look strange? This total is just nationwide permits, most development activities appear as individual permits.
3. Does it track completion? No this is strictly on paper.
4. Is the linear feet the actual project length or where does the figure come from? This data is reflective of the authorized footage.
5. In terms of evaluating, the different types of bank stabilization, are these going to be distinguished? Will try to break this information down in final report.
6. Would like some quality control on information of preliminary draft report. The contract requires that a draft report be reviewed by a committee including at a minimum the COE, EPA, NRIS and DEQ.

Discussion on Wetland Regulatory Issues.

Discussion began with additional information by Jean Ramer, COE, regarding new revisions of the Nationwide Permits which was issued January 15, 2002. Revisions are on a 5-year cycle. Handout includes a comparison of nationwide activity and 2001 proposed and 2002 final rules and indicates the changes to NWP 14, 21, 27, 30, 31, 32, 37, 39, 40, 42 and 43. Changes to General Conditions include GC 3, 4, 9, 11, 13, 19, 21, 26 and 27. These are scheduled to go into effect March 18, 2002. The COE states that despite recent news reports, the new nationwide permits offer no sweeping changes. In addition to the changes listed above, other summaries indicate that the revised permits include changes to the NWP mitigation and floodplain requirements, changes to water quality and water flow management requirement, changes to the 300-foot linear restriction and a new no-net-loss wetland policy.

The US Fish and Wildlife Service collated 15 pages of comments nationally on the proposed changes that were never forwarded on to COE by the Department of Interior.

Group discussion:

1. Is there a need for additional training or workshop on regulatory wetland issues, especially after additional guidance on SWANCC is released? Who would be target audience? Consultants and communities could be targeted, municipal officials. Didn't seem to be strong consensus that this is necessary, Council would like to hear from DEQ legal section.
2. Is there any intent to introduce state legislation to address wetlands that have fallen out of protection? DEQ staff is asking for legal opinions and interpretation on several issues related to SWANCC. For this legislative session nothing is planned.
3. Would attorneys be willing to give us some answers as to their interpretation of this gray area? It is unclear as to what SWANCC affects at the federal level and it is unclear as to what the states will have to do to protect wetlands. Everyone is anxious for more guidance.
4. Clarification on recreational navigation interpretation? Jurisdictional decision was given on an isolated lake where there was a marina and boats. If there is documentation of boat use there is cause for jurisdiction.

Update since the Council Meeting: Corps Publishes Issuance of Nationwide Permits: Notice: Correction. In the February 13, 2002, Federal Register (Vol. 67, No. 30 pp. 6692-6695) the Corps published corrections to the earlier Issuance of the Nationwides. It is noteworthy that in this particular version, the Corps has republished Nationwide 39 (Residential, Commercial, and Institutional Developments), as well as the Definition of the Loss of Waters of the U.S. in their entirety.

Wetland Protection through the Statewide Comprehensive Outdoor Recreation Plan (SCORP)

Walt Timmerman, Montana Fish, Wildlife & Parks (FWP), is revising the 1993 Montana SCORP and has requested assistance from the Wetland Council with the wetlands section of the plan. This recreation grants program may provide another opportunity for wetland mitigation and protection in Montana. Provided history on the Land & Water Conservation Fund (LWCF). The LWCF program encourages a full partnership between state and local governments and provides a 50% cost share. Maximum grant amount is \$75,000. Past LWCF funding has been sporadic, future funding for Montana dependent upon annual Congressional appropriations, but CARA passage would guarantee annual funding for the next 15 years. Wetlands have potential as a land swap in Section 6(f) mitigation as long as they have public access. Looking for volunteers to help FWP with information such as:

1. List wetland resources.
2. Identify wetland types
3. Distribution map of Montana wetlands
4. Rank and prioritize wetlands regionally
5. List of contacts and consultants

Generally, statewide information is not available, but developing a process for ranking wetlands and utilizing experts and consultants in the decision-making process could be a reasonable approach. Several Council participants agreed to help with different aspects.

Wetland Updates and Coordination Reports.

Montana Department of Environmental Quality. Lynda Saul discussed 6 wetland proposals submitted to EPA for funding, one local government in the Flathead Lake area and 5 for development of a comprehensive wetland monitoring and assessment program. EPA should make funding decisions in March. DEQ web site includes wetlands grants information.

Two information sources for those interested in keeping up on national wetland issues:

- 1) Association of State Wetland Managers' Wetland Breaking News - Providing a free bimonthly briefing about the news and events concerning America's wetlands. Wetland Breaking News is an edited compilation of wetland-related information submitted by readers and gleaned from list-serves, press releases, and web sites from throughout the U.S. aswm-wbn-request@aswm.org.
- 2) National Wetlands Newsletter published bimonthly by the Environmental Law Institute, 1616P Street N.W. Suite 200, Washington D.C. 20036. Subscription \$40 for 6 issues. Phone 800/433-512 or orders@eli.org.

Montana Wetland Legacy. Tom Hinz works out of Bozeman Fish Wildlife and Park office 994-7889 for consortium of wetland protection entities: state, local, federal, private, industry. Voluntary and incentive based program, goal 250,000 acres protected in 5 years. Montana Natural Heritage program tracking progress, 73,000 acres in first year. Working on grant writing and 3 projects in Madison-Missouri corridor. Setting up new web page will be at www.wetlandslegacy.org.

Montana State Library. Duane Anderson, continue to update digital orthophotos, 80 percent of the state available. Latest update of COE permits in database. New water rights database with interactive query, 1.2 million records in Montana. Groundwater well database now keyed to which wells have water quality information and link to that data. Currently recruiting for water information position in NRIS.

Montana Department of Transportation. Larry Urban, MDT is in need of mitigation in the Musselshell. Several projects under construction near Hall (Maxwell to Drummond) and near Sula Camp Creek restoration project. Finished Kleinschmidt Flat creek restoration in the Ovando valley.

U.S. Fish and Wildlife Service. Rob Hazlewood reported on several ongoing projects. Private Lands Division works cooperatively with landowners on on-the-ground wetland protection. Have staff devoted to Endangered Species Act compliance for all MDT projects. Working on Madison-Missouri project with \$10 million private funds from PPL Montana FERC relicensing on wetland and river restoration from Hebgen Dam to Fred Robinson Bridge. New aerial photos of entire Madison and Missouri rivers for NWI and riparian mapping. Working with BOR, others on a flow inundation study to evaluate different flow stages on the Madison and Missouri. Working on stream mitigation guidelines with MDT.

Natural Resources Conservation Service. Pete Husby, NRCS wetland protection programs, Swampbuster and landowner assistance responsibilities have not changed as a result of SWANCC. The Farm Service Agency is reviewing the CRP Enhancement program for the Madison-Missouri corridor. This program would bring in \$40 million of federal funds for landowners for restoring wetlands and other private lands along the corridor. Requires 20 percent match to federal money which is provided by PPL Montana from the FERC relicensing. Hope to have sign ups starting this spring.

Bureau of Reclamation. Justin Kucera reported on three new projects; Helena Valley study with MSU on migratory birds, Bowdoin piping plover and flow inundation study on the Madison Missouri river.

U.S. Geological Survey: Northern Rockies Science Center. Rick Sodja discussed three studies. Ecological successes and wetland functions at Red Rocks, integration of trumpeter swam habitat and developing a proposal to evaluate the impacts of coal bed methane development on wetlands.

U.S. Army Corps of Engineers. Jean Ramer reported that the COE and EPA are looking are redefining fill material. Mine waste was not regulated, but will now include mine waste and processed gravel as part of 404. Changing how they regulate where they regulate and what they regulate.

Montana Department of Military Affairs. Sundi West introduced herself as the new Military Affairs Environmental Protection Specialist. They have two properties in Montana; Fort Harrison at 6,000 acres and Limestone Hills at 20,000 acres. DMA has fenced off the wetlands on these properties.

Missoula County. Brian Maiorano reported that the County is supporting removal of Milltown dam. It's been 2 years since the County's ban on riprap and the new floodplain rules are working well. Brian is also Chair of the Montana Association of Floodplain Managers and reminds everyone of the MAFM annual conference April 10 thru 12 on the downtown Missoula riverfront. The theme of this year's conference is "Changing Our Ways—Historic Mistakes and Creative Solutions." Bank stabilization field tours are on the agenda. Registration will be sent out soon. Floodsinmt@aol.com for more information.

Lewis and Clark County Water Quality District. Jim Wilber LCWQPD is completing phase 2-wetland grant to prioritize wetland restoration and conservation projects in the greater Helena valley area.

Montana Water Course. Pete Shade reported that Montana Water Course Director and Wetland Education staff positions have been vacant for several months, so wetland education contracts with DEQ have largely been on hold. Expect to be hiring a new Director soon. The Rocky Mountain Watersheds Volunteer Monitoring Network will hold meeting to discuss citizen wetlands monitoring in Utah June 16-18. If interested contact khoffman@plumasnet.com

Montana Audubon. Janet Ellis reported that they are creating a field guide of bank stabilization, are working on a land use planning guide to protect wetlands and recently protected 2.5 acres of wetlands as a natural park in Helena valley near the fairgrounds.

Montana Water Center. Michelle White reported that the Montana Water Center received a congressional legislative earmark for \$400,000 for fish habitat informational project including creating a web site to document fish habitat restoration including bull trout and cold-water fish diseases.

Montana Department of Natural Resources. John Peterson reminded folks when working on wetland restoration projects to look into water right issues and possible needs for a permit.

Potential Agenda Items for Next Wetland Council Meeting.

Next meeting will be in mid-summer. Potential agenda items identified by participants include:

- Presentation by DEQ legal staff on wetlands and DEQ authority and update on SWANCC.
- Montana Watershed Coordination Council - consider including some participants to attend this meeting.
- Share some specific projects that are Montana Wetland Legacy projects, species benefits, and acres preserved.
- Wetland monitoring and assessment work plan.
- Time on agenda to brainstorm research needs for wetlands in Montana.
- CRP Enhancement update and Farmable wetland pilot program/Farm Bill update.
- Water right information available over the Internet - NRIS new program.

Montana wetland information can be found at the NRIS Wetland Clearinghouse web site <http://nris.state.mt.us/wis/wetlands>.

The Montana Wetland Council meets three times a year in Helena; everyone is welcome to attend. For additional information please contact Lynda Saul, Montana DEQ, 444-6652 or lsaul@state.mt.us.

Montana Wetland Council Meeting - February 6, 2002

Sign-In Sheet

Jean Ramer
Mary Price
Donna Pridmore
Chris Thelen
John Peterson
Gordon Stockstad
Jolene Jacobson
Lawrence J. Urban
Rob Hazlewood
Rick Sojda
Jim Domino
Sundi West
Rick Walsh
Mary Vandenbosch
Mary C. Weatherwax
Mark Traxler
Brian Maiorano
Steve Brown
Jim Wilbur
Kris Knutson
Pete Schendel
Janet Ellis
Connie Cole
Bruce Waage
Curtis Kruer
Dennis Longknife
Jean Riley
Michelle White
Pete Schade
Allan Steinle
Cary Hegreberg
Vicki Sullivan
Myrna Walking Eagle
Tillman McAdains
Mike Merigliano
Matt Koozer
Walt Timmerman
Duane Anderson
Scott Jackson
Jeff Ryan
Justin Kucera
Stan Sternberg
Jim Lovell
Pete Husby
Lou Moore
Lynda Saul

Representing

U.S. Army Corps of Engineers
Self
RLK Hydro
Hyalite Environmental
Water Rights; Dept of Natural Resources & Conservation
Montana Department of Transportation
Confederated Salish and Kootenai Tribes
Montana Department of Transportation
U.S. Fish and Wildlife Service
United State Geological Survey
MT Department of Natural Resources and Conservation
Military Affairs
Montana Power Company
Legislative Environmental Policy Office
Blackfeet Environmental Office
Land & Water Consulting
Missoula County
Garlington, Lohn, and Robinson
Lewis and Clark Water Quality Protection District
Environmental Protection Agency
U.S. Army Corps of Engineers
Montana Audubon
Harding ESE
Western Energy Company
Self
Fort Belknap Indian Community - Wetlands Program
Montana Department of Transportation
Montana Water Center
Montana Watercourse
U.S. Army Corps of Engineers
Contractor's Association
U.S. Army Corps of Engineers
Fort Peck Tribes
Self/Relocating to Montana
University of Montana
Aquatic Design and Construction
MT Fish, Wildlife, and Parks
Montana Natural Resource Information System
U.S. Fish and Wildlife Service
Montana Department of Environmental Quality
U.S. Bureau of Reclamation
Montana Department of Transportation
Confluence Consulting
Natural Resource Conservation Service
Montana Department of Environmental Quality
Montana Department of Environmental Quality