



P.O. Box 4310, Whitefish, Montana 59937

Tom Livers, Director  
Montana DEQ  
PO Box 200901  
Helena, MT 59620-0901

Delivered via email

Date 5/23/16

Dear Mr. Livers:

The proposed Montana Artesian Water Company (MWC) water bottling plant in Creston, Montana, has elicited tremendous public concern in the short time since the company announced its plans and the public became aware of those plans. The water rights permitting process under DNRC rules do not afford the general public with an opportunity to participate in the matter of water development and export from Montana as an issue of considerable public concern. However, rules under the DEQ's authority may provide an opportunity for the public to participate in their government's decision-making process.

We request with this letter that DEQ authorize a full environmental impact study review of the MWC proposal and examine the cumulative impacts of this proposal in the context of the high likelihood that MWC's proposal will be the first of many such proposals. We request that the EIS also examine and reveal:

- The legal framework that would permit the export of water from Montana, as well as the ability of the state of Montana to limit the subsequent extraction and export of water should MWC's initial proposal be approved.
- A realistic assessment of the potential or likelihood of subsequent or additional water mining for bottling and export purposes, given the history of water bottling developments across the country, and
- The direct and secondary impacts of this specific operation. This should include impacts associated with heavy truck traffic (dust, noise, impact to local neighborhoods), on-site industrial lighting, water discharge effluent, and geothermal water discharge, impacts to adjoining property values and other potential negative economic impacts.

Headwaters Montana works to protect the water, wildlife and traditional, quiet outdoor recreational opportunities in the Crown of the Continent. We maintain a list of over 2000 individuals who subscribe to our e-newsletter. We look forward to participating in the MEPA process associated with the MWC proposal.

Sincerely yours,

Dave Hadden, Director

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*Headwaters engages citizens of the Crown of the Continent in the region's critical conservation issues: water and wildlife conservation, and climate change.*