

March 18, 2026

**VIA EMAIL & CERTIFIED U.S. MAIL
RETURN RECEIPT REQUESTED**

Lee Zeldin, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
zeldin.lee@epa.gov

Doug Burgum, Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240
exsec_exsec@ios.doi.gov

Sonja Nowakowski
Director, Montana Dept. of Environmental Quality
2401 Colonial Dr
Helena, MT 59601
sonja.nowakowski@mt.gov

**RE: Second Notice of violations of the Endangered Species Act in connection with
the Environmental Protection Agency's Oct. 3, 2025, Approval of Revisions
to Montana's Water Quality Standards for Nutrients**

You are hereby notified that Upper Missouri Waterkeeper, Flathead Lakers, and the Confederated Salish and Kootenai Tribes (Commenters) intend to file a citizen suit pursuant to the citizen suit provision of the Endangered Species Act (ESA), 16 U.S.C. § 1540(g), for violations of the ESA, 16 U.S.C. § 1531 et seq., and specifically violations of Sections 7 and 9 of the Endangered Species Act and its implementing regulations, 50 C.F.R. Part 402.

On October 3, 2026, the Environmental Protection Agency (EPA) approved revisions of the State of Montana's nutrient water quality standards (WQS). EPA's approval letter admitted the agency initiated, but had not completed, consultation. On October 31, 2025, the aforementioned parties sent EPA, the United States Fish and Wildlife Service (FWS), and the Department of the Interior (DOI) a 60-Day Notice of Intent to Sue under the ESA for failure to complete Section 7 Consultation.

On January 26, 2026, the aforementioned parties filed suit against EPA regarding its approval of Montana's elimination of nutrient water quality standards: that case is pending in the District of Montana.

By letter dated February 24, 2026, FWS belatedly completed informal consultation with the EPA, after the agency had approved Montana's revision of nutrient water quality standards and specifically the elimination of numeric nutrient criteria and reversion to a singular narrative standard applicable to nutrient pollutants.

FWS' concurrence consisted of a single page letter devoid of any analysis. Indeed, instead of providing any substantive rationale entailing application of best available science – including but not limited to any evaluation of the numeric nutrient criteria that both EPA and FWS previously found capable of - and necessary to - protecting both designated uses of Montana surface waters and protecting water-dependent species protected by the Endangered Species Act, the concurrence simply and solely tiers to EPA's defective finding that "Montana will be able to translate the narrative criteria relying upon the available science to provide the same level of protection as the numeric criteria."

In turn, EPA's conclusory finding (i.e., the October 3, 2025 approval of Montana's nutrient WQS revision) is itself contrary to procedural and substantive requirements of the agency's implementing rules, lacks substantial evidence, and was contrary to the CWA. Put simply, EPA's decision relies on unfounded promises from the State of Montana that speculative, future rulemaking implementing narrative nutrient water quality standards will offer equal protection as numeric nutrient criteria and/or necessary protections to waterways and water-dependent species today. EPA already determined in 2015 that the same narrative standard was incapable of offering adequate protection to designated uses or water dependent species, a finding in which FWS agreed. It is axiomatic that future, unenforceable aspirational actions and findings lacking a defensible scientific basis, much less by a third-party, cannot be the basis for FWS' ESA decision-making today. Moreover, FWS' concurrence was arbitrary and capricious in light of the scant evidence supporting its, or EPA's, decisions.

Legal Framework

Section 7 of the ESA imposes a substantive obligation on federal agencies to "*insure* that any action authorized, funded, or carried out by such agency...is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of" habitat that has been designated as critical for such species. *See* 16 U.S.C. §1536(a)(2) (emphasis added); *Pyramid Lake Paiute Tribe of Indians v. US. Dep't of the Navy*, 898 F.2d 1410, 1415 (9th Cir. 1990). Such jeopardy results where an action reasonably would be expected, directly or indirectly, to reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of that species. 50 C.F.R. § 402.02. Destruction or adverse modification of critical habitat occurs where there is a direct or indirect alteration that appreciably diminishes the value of critical habitat for both the survival and recovery of a listed species. *Id.*

In fulfilling the substantive mandates of section 7 of the ESA, federal agencies planning to fund, authorize, or undertake an action (the "action agency") that "may affect" ESA-listed species or their critical habitat are required to consult with FWS (the "consulting agency") regarding the effects of the proposed action. 50 C.F.R. §402.14(a). Formal consultation concludes with FWS issuance of a biological opinion determining whether the action is likely to jeopardize ESA-

protected species or result in adverse modification of critical habitat. 50 C.F.R. § 402.14(h)(3). If FWS determines that such jeopardy is not likely, or that reasonable and prudent alternatives to the proposed action will avoid jeopardy, and that any taking of listed species incidental to the proposed action will not violate section 7(a)(2) of the ESA, FWS must issue an incidental take statement with its biological opinion. 16 U.S.C. § 1536(b)(4). The incidental take statement includes reasonable and prudent measures considered by FWS as necessary or appropriate to minimize impacts on ESA listed species. 16 U.S.C. § 1536(b)(4)(C)(ii); 50 C.F.R. § 402.14(i)(1)(ii).

Informal consultation is an optional process that includes all discussions between FWS and the action agency prior to formal consultation, if required. 50 C.F.R. § 402.02. If, through this process, the action agency determines that its proposed action is "not likely to adversely affect" protected species and FWS issues a written concurrence in that determination, the consultation requirements of section 7 of the ESA are fulfilled and formal consultation is not required. 50 C.F.R. § 402.13(a). Effects determinations must be based on the sum of the direct, indirect, and cumulative effects of the action, added to the environmental baseline and interrelated and interdependent actions. *Id.* § 402.02 (defining "effects of the action."). Further, FWS must use "the best scientific and commercial data available" to evaluate the impacts the action will have on listed species. 50 C.F.R. § 402.14(g); see also 16 U.S.C. § 1536(a)(2).

Section 9 of the ESA prohibits any person, including any federal agency, from "taking" any listed species without proper authorization through a valid incidental take permit. 16 U.S.C. § 1538(a)(1)(B); 50 C.F.R. § 17.31(a). "Harm" has been defined broadly to include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering. 50 C.F.R. § 17.3. Courts have found federal agencies liable for unlawful take of listed species where agency-authorized activities resulting in the killing or harming of species. *See, e.g., Defenders of Wildlife v. Adm'r, Env'tl. Prot. Agency*, 882 P.2d 1294 (8th Cir. 1989).

Absent a meaningful consultation, and without the procedural requirements of the ESA, the severity and magnitude of the threats to listed species is simply unknown—as is the amount of take that has occurred in the past due to water pollution, which has never been assessed or quantified, let alone legally authorized. If the revised water quality standards are insufficiently protective of endangered species — often the most sensitive species to water pollution — then harm and take will continue to occur, and the recovery of those endangered species will be delayed or precluded.

The ESA makes completely clear that an agency cannot proceed on actions that cause take without an incidental take statement ("ITS") from the Services. As part of an incidental take statement, the Services must provide reasonable and prudent measures ("RPMs") to minimize the impact of any taking of listed species. 50 C.F.R. § 402.12.

Indeed, in 2001, EPA and the Services entered into a Memorandum of Agreement Regarding Enhanced Coordination Under the Clean Water Act and Endangered Species Act ("MOA"). *See* U.S. EPA, U.S. FWS, and NMFS, 2001. *Memorandum of Agreement Between the Environmental Protection Agency, Fish and Wildlife Service and National Marine Fisheries Service Regarding*

Enhanced Coordination Under the Clean Water Act and Endangered Species Act January 18, 2001, EPA-823-F-01-002 (hereafter “2001 MEMORANDUM”) .

If the Service anticipates that incidental take will occur, the Service’s biological opinion will provide an incidental take statement that will normally contain reasonable and prudent measures to minimize such take, and terms and conditions to implement those measures. Reasonable and prudent measures can include actions that involve only minor changes to the proposed action, and reduce the level of take associated with project activities. These measures should minimize the impacts of incidental take to the extent reasonable and prudent. Measures are considered reasonable and prudent when they are consistent with the proposed action’s basic design, location, scope, duration, and timing. The test for reasonableness is whether the proposed measure would cause more than a minor change to the proposed action. 50 CFR 402.14(i)(2).

Appropriate minor changes can include, for example, a condition stating that the EPA Regional Office will work with the State or Tribe to obtain revisions to the water quality standards in the next triennial review. Where either of the Services believe that there is a need for the standards to be revised more quickly, the Service should work with EPA and the State or Tribe to determine whether any revisions could be developed more quickly than the next anticipated triennial review. Because reasonable and prudent measures should not exceed the scope of EPA actions, reasonable and prudent measures in a water quality standards consultation should not impose requirements on other CWA programs unless agreed to by both EPA and the Services.

The Services may include research or data gathering undertakings as conditions of an incidental take statement contained in a biological opinion where it determines that the way to minimize future incidental take is through research and data gathering. However, to the maximum extent possible, the Services will work with EPA to identify research needs that will be addressed in the National Research and Data Gathering Plan. The Plan identifies high priority data and information needed to reduce the uncertainty inherent in the degree to which water quality criteria would protect listed species. Research and data identified in the Plan has the goal of minimizing any incidental take associated with water quality standards.

Where site specific research or data are needed that are not addressed in the Plan, the biological opinion will explain how the research or data gathering will minimize such take while not altering the basic design, location, scope, duration, or timing of the action.

Id. at 17.

ESA Violations

EPA approved substantive changes to Montana's numeric nutrient water quality standards that may affect threatened and endangered species before consultation, and then sought to cure the failure to perform consultation by securing a single-page concurrence from FWS. The single-page, belated FWS concurrence is devoid of any analysis and wholly ignores the potential effects

of eliminating numeric nutrient WQS on threatened and endangered water-dependent species in Montana. EPA's 2015 approval of Montana's numeric nutrient criteria found that criteria necessary to effective protection of designated uses, including aquatic life. Further, FWS supported that decision because the adoption of numeric nutrient criteria offered a more precise, affirmative and anticipatory, mechanism for both controlling nutrient pollution sources and restoring degraded water quality conditions in Montana, with both being necessary to protection of imperiled species protected by the ESA.

Montana's 2025 reversion to narrative, nutrient criteria - and EPA's approval thereof and now FWS' concurrence in this action - flies in the face of a robust evidentiary record demonstrating that Montana's dual numeric nutrient criteria for wadeable streams is both protective of designated uses, representative of best available science, and protective of water-dependent species protected by the Act. Absent Montana's numeric nutrient criteria, point source dischargers of nutrient pollutants will have effluent limits based on assessment and identification of negative biological responses in receiving waters, a reactive and less-precise approach to water pollution control and protection of designated uses than that offered by numeric nutrient criteria.

Moreover, because the majority of NPDES dischargers in Montana were never issued a permit directly applying numeric nutrient criteria, existing technologies and actually-attained pollution controls for sources discharging nutrient wastes have the reasonable potential to cause or contribute to violations of water quality standards. Put another way, there is no safe harbor for EPA or FWS to allege, based on evidence, that the CWA's antibacksliding mandate prohibits worse nutrient pollutant discharges. Rather, most nutrient dischargers continue to discharge nutrients at loads with the potential to both degrade designated uses and in the process harm or take water-dependent species or their habitat in Montana.

Similarly, the State of Montana's recent Integrated Reports demonstrate that nutrient pollution is a top source of impairment for more than a third of assessed waters, and the number of nutrient impaired waters is growing each reporting cycle, not diminishing. *See, e.g. Montana 2020 Integrated Report.* And more recently MDEQ refused to even act on best-available science demonstrating exceedances of dissolved oxygen and nutrient pollutant parameters in its combined 2022-24 Integrated Report. As FWS and EPA know or should know, nutrient loading of surface water has caused and continues to cause widespread impairment of Montana surface waters. Nutrient loading is closely related to eutrophication, which is the increase in nutrient levels that triggers excessive algae/plant growth, leading to alterations in the water body, namely oxygen depletion. These changes cause death of fish and other aquatic organisms, creating an entirely different aquatic environment. While eutrophication can happen naturally in some ecosystems, it is frequently human-caused. And, when it does occur, it occurs rapidly, frequently leaving "dead zones" in waterbodies.

Eutrophication and nutrient loading are well known water pollution problems in Montana, and nationally. The State of Montana's most recent and approved Integrated Report identifies nearly one third of assessed surface waters as impaired by nutrient pollutants who, under EPA's action, now have less precise and more subjective standards and implementing criteria. A wide variety of activities are implicated in Montana's nutrient impairment or nuisance algal growth

determinations, including mining, animal feeding operations, residential development, and other point source discharges. Additionally, a whole host of other, largely non point-source discharges also contribute to these water pollution challenges. Agriculture, livestock grazing, riparian habitat loss and stream bank modifications are common sources of nutrient pollution, as are urban pollution from stormwater and the like. *Id.*

Rather than ameliorating these problems, Montana's elimination of numeric nutrient WQS will cause these water quality problems to increase and spread throughout the state. ESA-listed species that are freshwater dependent, dependent on freshwater prey, and/or require freshwater habitat for survival will be adversely affected by the revised nutrient WQS. Under the reversion to a singular narrative criterion prohibiting harmful effects on waterways, nutrients are allowed to be discharged to a waterbody to the point that eutrophication results. ARM 17.30.637. These narrative prohibitions by denotation require adverse effects to occur before the standard is triggered. Indeed, because adverse effects to aquatic life, including endangered and threatened species, are required for narrative nutrient standard in Montana to apply in the first instance, the plain language of these revisions automatically triggered the need for formal consultation.

Montana's waterways contain some of the last intact habitat and native populations of wild salmonids in the Lower 48. Montana is home to a wide range of species protected under the ESA, including a diversity of freshwater-dependent species. FWS' online database provides a long list of water-dependent species that must be addressed in EPA's biological evaluation and FWS' decision-making. An initial evaluation of each listed and candidate species potentially affected by changes to nutrient standards is necessary to determine whether the revised nutrient standards may affect listed, proposed for listing, and candidate species. Readily available information strongly suggests that threatened or endangered water-dependent species protected under the ESA in Montana are likely to be adversely affected by the revised nutrient standards adopted in Montana, including but not limited to eliminating the application of numeric nutrient criteria as best-available science capable of preventing harm to Montana waterways and their designated uses.

Exacerbating the negative biological effects caused or contributed to by nutrient pollution is the undisputed and variable effects of climate change. The ESA and its implementing regulations require the Services to consider current and projected climate change effects in their ESA decision-making process, using the best scientific data available. *Nat'l Wildlife Fed'n v. Nat'l Marine Fisheries Serv.*, 184 F. Supp. 3d 861, 917–23 (D. Or. 2016) FWS decisions violate the ESA if they “fail[s] to utilize the best available scientific information by not addressing the . . . issue of climate change” *Nat. Res. Def. Council v. Kempthorne*, 506 F. Supp. 2d 322, 388 (E.D. Cal. 2007). Here, FWS wholly failed to consider how climate change will interact with the effects of the action.

Climate change is projected to increase variability in Montana's freshwater ecosystems, including warmer temperatures and increased thermal loads that synergistically cause and contribute to eutrophication among other negative water quality impacts. Climate change will also negatively

affect flow and the distribution and quality of aquatic habitat for water-dependent species.¹ Among the best-available science available – but not considered – are peer reviewed climate models from the University of Montana’s Climate Office predicting continued and increasingly intense variability and drought in streamflow in many Montana surface waters.² FWS’ concurrence does not even identify much less evaluate a synthesis of anticipated effects of the proposed action and those of climate change.³ This omission represents a failure to consider a critical element related to whether the action will adversely affect imperiled species. *Nat’l Wildlife Fed’n v. Nat’l Marine Fisheries Serv.*, 184 F. Supp. 3d 861, 917 (D. Or. 2016) (“One inadequacy with NOAA fisheries’ analysis of climate impacts is that it does not consider whether the effectiveness of the . . . actions designed to offset adverse effects . . . will be diminished by climate change.”). These failures cannot be excused by any uncertainty, as the ESA does not require scientific certainty. *See Nw. Ecosystem All. v. U.S. Fish & Wildlife Serv.*, 475 F.3d 1136, 1147 (9th Cir. 2007) (NOAA Fisheries “may not ignore evidence simply because it falls short of absolute scientific certainty”); *see also Arizona Cattle Growers’ Ass’n v. Salazar*, 606 F.3d 1160, 1164 (9th Cir 2010). Ultimately, FWS failed to analyze an important aspect of the problem when they failed to discuss how to deal with climate change impacts for this Project.

In its February 24, 2026 letter, FWS issued a single-page concurrence, stating that EPA’s action is not likely to adversely affect protected species. FWS did not provide any evaluation of water-dependent species in Montana. FWS did not examine how the implementation of narrative nutrient criteria in pollution permitting or waterway assessments could affect listed species or their habitat. FWS did not evaluate the character of proposed narrative nutrient standards against Montana’s prior numeric nutrient criteria or provide any rationale as to how the former is equally - or more - protective than the latter.

Indeed, FWS issued its concurrence despite the data deficient character of the WQS package offered to EPA by the State of Montana in support of its revision of nutrient WQS, and despite the documented harm and significant risks posed by Montana’s application of less-protective, reactive, and speculative narrative nutrient standards to water-dependent species protected by the ESA.

One example of an ESA-listed water-dependent species that is likely to be adversely affected by Montana’s revised nutrient water quality standards is the Bull Trout. The Bull trout is a sub-

¹ “Characterization factors for the impact of climate change on freshwater fish species”, Institute of Environmental Sciences, available online:

<https://www.sciencedirect.com/science/article/pii/S1470160X23003801?via%3Dihub>; “Agency management plans also fail to address threatened species vulnerability to climate change in the US,” Center for Conservation Innovation, available online:

<https://www.sciencedirect.com/science/article/pii/S0006320723002859>

² *See, e.g.*, Montana Climate Office, Headwaters Hydrology Office, Streamflow Model, available online at: <https://climate.umont.edu/streamflow/>; *see also* “Drought Model”, available online at: <https://drought.climate.umont.edu>

³ *See also* “Anticipated climate warming effects on bull trout habitats and populations across the interior Columbia River basin,” *Transactions of the American Fisheries Society*, 136: 1552-1565, available online: <https://research.fs.usda.gov/treesearch/31563>

population of the salmonid family that is currently listed under the ESA. *See* 64 Fed. Reg. 58910 (November 1, 1999). Bull trout are threatened by "the combined effects of habitat degradation, fragmentation and alterations associated with dewatering, road construction and maintenance, mining, and grazing; the blockage of migratory corridors by dams or other diversion structures; poor water quality; incidental angler harvest; entrainment [...] into diversion channels; and introduced non-native species. *Id.* at 58910. Further, best available science has already determined that bull trout may be especially vulnerable to climate change given that spawning and early rearing are constrained by cold water temperatures creating a patchwork of natal headwater habitats across river networks. Climate change would both increasingly fragment local habitat and populations and exacerbate the negative effects of nutrient pollution loading to freshwater ecosystems in Montana.

Of native salmonids in the Pacific Northwest of the United States, bull trout have the most specific habitat requirements, which are often referred to as "the four Cs": cold, clean, complex, and connected habitat. Habitat components that influence bull trout distribution and abundance include water temperature, in-stream and stream-bank cover, channel form and stability, valley form, spawning and rearing substrate, and unobstructed migratory corridors. Juveniles remain in the substrate after hatching; the time from egg deposition to emergence of fry can exceed 200 days. During the relatively long incubation period in the gravel, bull trout eggs are especially vulnerable to fine sediments, streambed scour, and water quality degradation. *See* Five-Year Status Review: Summary and Evaluation, Bull Trout, USFWS, September 2024, p.6.

Nutrient loading of freshwater is directly linked to increased water temperatures, diminished dissolved oxygen in near-shore reaches, and eutrophication events, including but not limited to nuisance algal blooms that degrade substrate and foraging conditions. Numerous regulated point sources and many non-point sources discharge nutrient pollutants into waters designated as critical habitat for Bull Trout in Montana. Furthermore, many waterway segments designated as critical habitat for Bull Trout in Montana are in-fact impaired waters for nutrient pollution and remain listed on the state's 303(d).

FWS has violated its procedural and substantive obligations under ESA Section 7, 16 U.S.C. § 1536, by concluding that EPA's proposed approval of Montana's elimination of numeric nutrient WQS may affect but are not likely to adversely affect protected species. In reaching this determination FWS failed to consider the best scientific and commercial data available. Similarly, FWS issued a concurrence in response to informal consultation despite the removal of Montana's WQS and its rules presenting circumstances requiring formal consultation. FWS' actions were arbitrary, capricious, and abuse of discretion, and not in accordance with law.

And as referenced above EPA and Montana DEQ are also in violation of the ESA's prohibition on the "take" of listed species in Section 9. 16 U.S.C. § 1538(a)(1)(C). *Strahan v. Cox*, 127 F.3d 155, 163 (1st Cir. 1997), cert. denied, 525 U.S. 830 (1998) (holding state liable for take of endangered right whales by virtue of its licensing of private commercial fishing with equipment that caused whale entanglements and deaths); *Loggerhead Turtle v. Cty. Council of Volusia Cty.*, 148 F.3d 1231, 1251 (11th Cir. 1998), cert. denied, 526 U.S. 1081 (1999) (holding Volusia County subject to the take prohibition in the ESA for impacts of artificial beach lighting on loggerhead sea turtles).

Federal agencies are liable for take resulting from actions they approve. By approving Montana's nutrient WQS revisions absent formal consultation, EPA, along with Montana DEQ and any new NPDES permittees authorized under the revised standards, are operating without take liability. Montana DEQ implements the CWA in the State of Montana, and adopted inadequate water quality criteria for nutrients that result in the take of listed species. Montana's revised nutrient WQS will cause take, including death and injury to ESA-listed species, either from direct impacts or from habitat modification. *See* 50 C.F.R. § 17.3.

Under the CWA, water quality standards are the regulatory basis for establishing water quality-based controls for point sources of pollution. 33 U.S.C. §§ 1311, 1316. Water quality standards are also used to establish measures to control nonpoint source pollution. *See*, e.g., 33 U.S.C. §§ 1288, 1313, 1329. Additionally, these standards provide the foundation for identifying impaired waterbodies for listing and development of total maximum daily loads established to clean up contributing pollution sources. *See* 33 U.S.C. § 1313(d)(1)(A); 40 C.F.R. § 130.2(j). Montana's elimination of numeric nutrient criteria means MDEQ now cannot enforce science-based effluent limits in NPDES permits, cannot enforce numeric nutrient criteria-derived pollution controls in any CWA action, including impairment or TMDL actions, allowing both harmful pollutant loads and existing impairments capable of harming or taking water-dependent species protected by the Act. The revised nutrient standards allow nutrient loading to the point that eutrophication or adverse biological responses occur in the waterbody. These adverse effects will harass, harm, injury, and even lead to the death of ESA-protected species such as the bull trout.

By relying on a sole narrative nutrient prohibition absent any binding implementation tools or nutrient translator both demonstrated equally protective as numeric nutrient criteria and approved by EPA, MDEQ allows permittees under its jurisdiction operating pursuant to NPDES permits to discharge nutrient pollutants at levels capable of harming, or even taking, listed species, as well as permitting "significant habitat modification or degradation" otherwise prohibited by the Act. *See* 40 C.F.R. 17.3

In order to achieve safe harbor from ESA take liability for its approval of Montana's revised nutrient WQS, EPA, in addition to MDEQ and any newly permitted dischargers, must have written authorization from FWS in the form of an incidental take statement issued as part of FWS' biological opinion at the conclusion of formal consultation under Section 7. Because EPA has failed to carry out its obligation to comply with Section 7 formal consultation and obtain an ITS from the FWS as part of a biological opinion, EPA is liable for violations of Section 9 of the ESA. 16 U.S.C. § 1532(19); EPA's violations of ESA section 9 in connection with its approvals of Montana's revised nutrient WQS are actionable under the ESA's citizen suit provision, 16 U.S.C. § 1540(g)(1)(A).

Conclusion

If the EPA and FWS do not act to remedy these violations within 60 days, Commenters will amend their litigation in federal district court against the EPA and add the FWS as a party and seek declaratory and injunctive relief and reasonable attorneys' fees and costs. If you have any questions or would like to discuss potential remedies prior to the expiration of this notice, please do not hesitate to contact us at the telephone numbers or email addresses below.

Sincerely,

Guy Alsentzer, Esq.
Upper Missouri Waterkeeper
24. S. Willson Ave, Ste. 6-7
Bozeman, MT 59715
T: 406.570.2202
Guy@uppermissouriwaterkeeper.org

Other Commenters:

Confederated Salish & Kootenai Tribes
PO Box 278
Pablo MT 59855
406.675.2700

Flathead Lakers
PO Box 70
Polson, MT 59860
406.883.1346