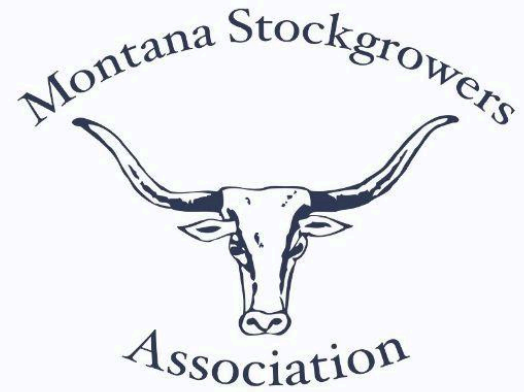


August 8, 2025

Director Amanda Kaster
Montana DNRC
1539 Eleventh Ave
Helena, MT 59635



RE: Montana Administrative Rulemaking - MAR No. 2025-157.1, Notice of Proposed Rulemaking

The Montana Stockgrowers Association (MSGA) appreciates the opportunity to comment on the rules package MAR No. 2025-157.1. Our organization represents water rights holders across Montana. MSGA has worked for over 140 years to develop and coordinate unified policy positions and regulatory actions that most effectively represent Montana ranchers and protect their senior water rights.

Overall, our organization supports the rules package that has been proposed. Our organization supported much of the legislation directing ARM 36.12.101, 36.12.102, 36.12.103, 36.12.115, 36.12.117, and 36.12.1305 and are pleased with the proposed amendments to the rules.

Under, 36.12.102 FORMS, Form No. 602I, "Notice of Intent to Appropriate Groundwater, we support the addition of this form as it helps to ensure the department is aware of new groundwater developments being added and could stop cumulative impacts on existing senior water right holders.

Additionally, we appreciate the language changes included 36.12.117 OBJECTION TO APPLICATION to ensure the objection process is clear and understandable. We also appreciated the update in the rules to allow for electronic communications. However, we would ask for the department to consider providing more than 15 days for objectors who receive Objection Deficiency Notices. For many water users, 15 business day may not be enough time.

For 36.12.1305 FILING A CHANGE APPLICATION AND FORM ACCEPTANCE, we fully support the elimination of all rules under (8) to align with the new stockwater permit change exemption.

NEW RULE 7 (36.12.2102) TEMPORARY LEASE OF A WATER RIGHT, we would ask the department to consider adding language into the rules to provide clarity on what happens if more water is used than approved and the process for enforcement actions, whether it be revoking the permit or implementing a fine.

Again, MSGA appreciates DNRC's transparency and their inclusion of water rights holders throughout this process.

Sincerely,

Raylee A. Honeycutt
Executive Vice President
Montana Stockgrowers Association