

RESPONSE TO PUBLIC COMMENT
Concentrated Animal Feeding Operation General Permit (CAFO GP)
MPDES Permit No. MTG010000

The Montana Department of Environmental Quality (DEQ) issued Public Notice MT-23-04 on July 17, 2023. The Public Notice provided the tentative determination to issue a statewide wastewater discharge permit renewal for the Concentrated Animal Feeding Operation General Permit (CAFO GP) under the Montana Pollutant Discharge Elimination System (MPDES) permit MTG010000. The notice included the draft Permit, Fact Sheet, and draft Environmental Assessment (EA).

The notice required that all written comments be received or postmarked by August 21, 2023, to be considered in formulation of the final determination and issuance of the permit. A public hearing was also held on August 21, 2023, to accept public comments. DEQ received no comments during the public hearing. DEQ received written comments from the parties in the table below. Because many commenters submitted similar comments, the table below identifies individuals whose comments were selected as representative of the substantive comments received on the public notice package. A full list of commenters is attached to this response to comments document.

Representative Sample of Persons/Entities Submitting Substantive Comments on Public Notice Package of MPDES Permit MTG010000	
No.	Commenter
1	EPA Region 8
2	Montana Department of Transportation (MDT)
3	Annick Smith
4	Barbara Kauffman
5	Andrea Feige
6	Upper Missouri Waterkeeper, Center for Food Safety, Food & Water Watch, Socially Responsible Agriculture Project

A synopsis of the submitted comments and DEQ’s responses are included below. DEQ has considered these comments in preparation of the final permit and decision. A copy of the original comment letter is available from DEQ upon request. This Response to Comments is an addendum to and supersedes relevant portions of the Fact Sheet to the extent those changes are described herein.

Comment 1: EPA Region 8

This permit may need to address the Food & Water Watch Petition decisions that require CAFO permits to include monitoring for underground discharges from the production area that ultimately reach surface waters and monitoring for dry weather discharges from land application areas. (Ninth Circuit Court of Appeal’s Order and Opinion filed on December 16, 2021, in *Food & Water Watch et al. v. U.S. Environmental Protection Agency* (No. 20-71554) (“*Food & Water Watch*”). For exemplary language in this regard, EPA Region 10 public noticed their modified National Pollutant Discharge Elimination System (NPDES) General Permit for CAFOs located in the State of Idaho (Permit No. IDG010000) to address the Ninth Circuit Court decisions for the Food & Water Watch Petition. The draft NPDES general permit (with new/changed conditions highlighted in yellow) and the supporting fact sheet addendum, which explains the basis for the new/changed conditions, are available for review at: <https://www.epa.gov/npdes-permits/proposed-modification-npdes-general-permitconcentrated-animal-feeding-operations>. [epa.gov]

Response to Comment 1:

Monitoring underground discharges:

CAFOs should not discharge to groundwater because of liners in their livestock waste control facilities (Section II.C.1) and agronomic uptake in the land application sites. However, the CAFO GP gives DEQ the ability to require groundwater monitoring (Section III.C). For example, DEQ may require the permittee to monitor groundwater near the facility if any component of the production area constitutes a potential source of pollution to state groundwater. Monitoring may be required in areas having shallow ground water or soils materials in the unsaturated zone with low filtering capacity. In these instances, a CAFO must submit a groundwater monitoring plan, which includes any applicable monitoring wells, and the plan is reviewed by DEQ.

All monitoring data is publicly available in DEQ records or online at EPA's ECHO website.

No change was made to the permit in response to this portion of the comment.

Monitoring dry weather discharges from land application areas:

DEQ agrees to include land application monitoring requirements into the CAFO GP. The following language has been included in Section II.D.1 of the final permit:

- a) *During any land application of liquid manure or process wastewater to a field with a Phosphorus Site Index risk assessment rating of medium or higher, a visual inspection of the downgradient edge of the field and any other potential discharge locations (e.g., tile drains, ditches, or other conveyances) must be conducted during the land application event and after the land application event to check for field runoff and discharges. In the event of a discharge the monitoring requirements of Section III.A must be implemented.*
- b) *During any land application of manure, litter, or process wastewater to a land application area where a land application setback or compliance alternative is required pursuant to Sections II.D and II.E of this permit, a visual inspection must be conducted during the land application event and after the land application event to 1) confirm that the land application setback or compliance alternative is being maintained and functioning as intended and 2) determine if there are any discharges. In the event of a discharge, the monitoring requirements of Section III.A must be implemented.*

Comment 2: EPA Region 8

Part I.G.2 (page 5): This permit should include all of the substantial changes to the terms of an NMP as outlined in 40 CFR 122.42 (e)(6)(iii), Changes to a Nutrient Management Plan (NMP), in Part I.G.2.

- Addition of new land application areas not previously included in the CAFO's NMP.
- Any changes to the field-specific maximum annual rates for land application.
- Addition of any crop or other uses not included in their terms of the CAFO's NMP and corresponding field-specific rates of application.
- Changes to site-specific components of the CAFO's NMP, where such changes are likely to increase the risk of N and P transport to waters of the U.S.

Response to Comment 2:

Any permit issued to a CAFO must include the requirements specified in 40 CFR 122.42(e). See ARM 17.30.1343. DEQ agrees to include the language pertaining to substantial changes to the terms of an NMP as outlined in 40 CFR 122.42 (e)(6)(iii). The following language will be included into Part I.G.2.b) of the general permit:

Substantial changes to the terms of a nutrient management plan incorporated as terms and conditions of a permit include, but are not limited to:

- *Addition of new land application areas not previously included in the CAFO's nutrient management plan. Except that if the land application area that is being added to the nutrient management plan is covered by terms of a nutrient management plan incorporated into an existing NPDES permit in accordance with the requirements of Section II.F of this permit and the CAFO owner or operator applies manure, litter, or process wastewater on the newly added land application area in accordance with the existing field-specific permit terms applicable to the newly added land application area, such addition of new land would be a change to the new CAFO owner or operator's nutrient management plan but not a substantial change for purposes of this section;*
- *Any changes to the field-specific maximum annual rates for land application, as set forth in Section II.F.5.a), and to the maximum amounts of nitrogen and phosphorus derived from all sources for each crop, as set forth in Section II.F.5.b);*
- *Addition of any crop or other uses not included in the terms of the CAFO's nutrient management plan and corresponding field-specific rates of application expressed in accordance with Section II.F; and*
- *Changes to site-specific components of the CAFO's nutrient management plan, where such changes are likely to increase the risk of nitrogen and phosphorus transport to state waters.*

Comment 3: EPA Region 8

Part I.J.1.b (page 6) states that “The facility is no longer a CAFO that discharges manure, litter, or process wastewater to state waters.” Does this mean that CAFOs that do not discharge can be terminated from permit coverage?

Response to Comment 3:

CAFOs, as defined in 75-5-801 MCA, or designated in accordance with 17.30.1330(5) through (7), are point sources subject to the MPDES requirements as provided in 17.30.1330. Once an animal feeding operation is defined as a CAFO for at least one type of animal, the MPDES requirements for CAFOs apply with respect to all animals in confinement at the operation and all manure, litter, and process wastewater generated by those animals or the production of those animals, regardless of the type of animal. As such, a CAFO cannot be terminated from coverage on the basis that it no longer discharges manure, litter, or process wastewater to State waters.

The quoted language has been removed from the permit.

Comment 4: EPA Region 8

Part II.C.2.c (page 9) states that “New wastewater containment structures or manure and wastewater disposal sites must follow any applicable setbacks from water wells.” What are the setback requirements for water wells?

Response to Comment 4:

CAFO sewage lagoons must meet the setbacks established in ARM 17.30.1702. See also Part II.D.12 of the permit.

No changes were made to the final permit in response to this comment.

Comment 5: EPA Region 8

Part III.A.2 (page 19): Are there any sample collection requirements for the discharge? For example, the samples must, at a minimum, be collected and analyzed for the following parameters: total nitrogen, nitrate nitrogen, ammonia nitrogen, total phosphorus, *E. coli* bacteria, five-day biochemical oxygen demand (BOD₅), total suspended solids, pH, and temperature.

Response to Comment 5:

There are no sample collection requirements for the discharge. In the event of a discharge, the reporting requirements of Section III.A must be implemented.

The permit requires BMPs and an NMP that includes requirements for regular soil and manure monitoring addressing either the linear or narrative nutrient application rate approach. Manure and process wastewater are never allowed to be discharged to State Waters except during a 25-year, 24-hour storm event, where most of the CAFO runoff will be captured, and any overflow is expected to be a diluted aliquot of the required soil and manure sample results. The requirements for sampling and agronomic uptake are incorporated into the CAFO GP from 40 CFR Part 412 and ARM 17.30.1334. A CAFO's NMP is reviewed by DEQ and made available for public review and comment pursuant to Section 1.6 of the permit. If a CAFO cannot meet the requirements of the CAFO GP, it must obtain an individual permit.

No changes were made in response to this comment.

Comment 6: EPA Region 8

Part VI (page 32): The "State Waters" definition shall include the Waters of the United States definition to be as stringent as the federal requirements (e.g., the Waters of the United States definition includes wetlands, etc.).

Response to Comment 6:

"State waters" is defined at Section 75-5-103, MCA. DEQ is authorized to issue permits to discharge sewage, industrial wastes, or other wastes into state waters. § 75-5-402(1), MCA. Waters of the U.S. are a subset of state waters, therefore, no change to the definition is necessary.

No changes were made in response to this comment.

Comment 7: EPA Region 8

Part XII.A.2 (Page 7) of the Fact Sheet contains a typographical error. It states that DEQ will receive comments on the six documents, but there are only three listed above.

Response to Comment 7:

The fact sheet is amended through this Response to Comments document.

No change was made to the final permit in response to this comment.

Comment 8: Annick Smith et al.

Comment 8A:

I strongly urge you to include representative monitoring in the general permit to ensure compliance and keep our waters safe. Discharge monitoring is a cornerstone of effective water pollution permits, which is why Montana requires monitoring under virtually every water pollution permit it issues. It is also required by the federal Clean Water Act, which Montana DEQ must comply with when issuing general permits.

The livestock industry should not be given a free pass to pollute. The draft permit assumes that CAFOs will flawlessly comply with the water quality standards, but we know this isn't always true: decades of evidence shows that CAFOs contaminate ground and surface water. CAFOs, as a matter of course, release numerous pollutants, including nutrients commonly associated with animal manure, such as nitrogen and phosphorus, but also pathogens, sediments, antibiotics, harmful metals, chemicals, hormones, and endocrine disrupting chemicals. This waste "is a primary source of nitrogen and phosphorus to surface and groundwater." Excess nitrates in drinking water can have serious long term health impacts and are not detectable without testing, while excess nutrients can cause harmful algal blooms, and pathogens can cause immediate illness. Montana already has about 4,693 miles of rivers and streams that cannot support primary contact recreation and approximately 16,633 miles that cannot support aquatic life.

Response to Comment 8A:

The CAFO GP contains monitoring, sampling, and recordkeeping requirements for the entire CAFO operation including the feeding area, the livestock waste control facilities, and the land application area. The permit requires BMPs and an NMP that includes requirements for regular soil and manure

monitoring addressing either the linear or narrative nutrient application rate approach. In addition, DEQ performs regular site inspections, during which inspectors can identify any evidence of a discharge, such as dead vegetation and erosional patterns, and require corrective actions. The requirements for monitoring, sampling and recordkeeping are incorporated into the CAFO GP from 40 CFR Part 412 and ARM 17.30.1334. A CAFO's NMP is reviewed by DEQ and made available for public review and comment pursuant to Section 1.6 of the permit. If a CAFO cannot meet the requirements of the CAFO GP, it must obtain an individual permit.

No change was made to the final permit in response to this portion of the comment.

Comment 8B:

I applaud the DEQ for drafting a permit with strict effluent limitations to minimize pollution discharges, which facilitates compliance with Montana's nondegradation policy, and meets the assumptions and requirements of existing or future total maximum daily loads for impaired waters. But without representative monitoring, DEQ and the public at large, including myself, will be unable to determine whether any permitted CAFO has complied with those effluent limitations or is contributing to water quality violations. DEQ must especially ensure there is no further harm to watersheds that are already contaminated with the same pollutants that CAFOs can release. The Ninth Circuit Court of Appeals has made it clear that representative monitoring is required in these permits. Further, as the recent decision in *Held v. Montana* makes clear, the state has an affirmative responsibility to protect its citizens' right to a clean and healthful environment. The climate crisis is fueled by the CAFO industry and has major impacts on our freshwater. DEQ must take this into account in drafting this general permit. Without representative monitoring, this permit falls flat in upholding DEQ's duty.

Response to Comment 8B:

In consideration of the recent decision in *Held v. Montana*, DEQ has amended EA Section 25.

Comment 9: Barbara Kauffman et al.

I urge you to amend the proposed Concentrated Animal Feeding Operation General Permit to include critical pollution monitoring requirements that will protect our environment and public health.

CAFOs are a known source of dangerous water contamination in Montana. Waste from CAFOs is often disposed of on fields without treatment, where it seeps or runs off into waterways and drinking water sources. Pollutants from CAFO waste includes, among others:

Nitrates, which pose serious public health risks, including cancer, thyroid disease, and premature births. Excess nutrients like nitrogen and phosphorus, which can cause harmful algal blooms that threaten public health and wildlife.

Pathogens like *E. coli* that can cause serious disease in humans.

As it's written, the proposed permit is largely unenforceable and would give CAFOs a free pass to pollute. Montanans deserve better than this.

Please hold polluters accountable and protect Montana's waters, not factory farms.

Response to Comment 9:

See response to Comments 5, 8A.

No change was made to the permit in response to this comment.

Comment 10: Andrea Feige et al.

Implement mandatory representative monitoring of potential CAFO discharge areas, including but not limited to downgradient locations of production and waste/manure/mortality storage areas - Federal law prohibits CAFOs from discharging any pollution, yet Montana's General Permit for CAFOs does not include any monitoring to ensure that there is in fact, zero discharge of pollution. We can't rely on promises and Best Management Practices alone, especially given the numerous instances of unlawful

CAFO discharges and widespread impairment of Montana's waterways. DEQ needs to implement mandatory monitoring to provide data that guarantees harmful pollution isn't being discharged into our waterways.

Response to Comment 10:

See response to Comments 5, 8A.

Surface water monitoring is generally ineffective in determining compliance of point sources. Presence of pollutants in a waterbody only indicates there is a source of a pollutant, not whether the source is a CAFO, another point source, nonpoint source or natural source. Also, absence of a pollutant does not mean the permittee is in compliance, only that nothing was detected at the time of sampling. These problems hold particularly true in the rural areas containing CAFOs where the CAFO's activity may be masked by other agricultural activities in a watershed. If a waterbody is impaired, DEQ develops TMDLs to identify all pollutant sources and seek reductions.

No change was made to the permit in response to this comment.

Comment 11: Andrea Feige et al.

Require more detailed criteria for waste containment structures - The General Permit contains vague language for waste containment. For example, a variety of containment methods are allowed for waste storage despite the differing efficacies between bentonite vs. geotextile liners. In addition, DEQ should prohibit the placement of waste storage facilities within (a) 100 year floodplains or (b) areas with documented high groundwater. It's important that we understand how and where waste from CAFOs is stored, and avoid known proximity to water resources, to ensure CAFOs won't degrade local ground or surface water. The permit language needs more details to adequately reflect protective waste storage criteria, including a specific prohibition on unregulated discharges to groundwater.

Response to Comment 11:

Regardless of which containment method the facility chooses, the facility must meet the groundwater protection requirements set forth in Section II.C of the permit.

In their application materials (NOI, NMP), facilities must report the type of containment and storage and attach a map that indicates the facility production area (which includes the waste containment areas). DEQ reviews these applications materials and makes them available for public review and comment pursuant to Section I.G of the permit.

DEQ agrees operating a CAFO within a 100-year floodplain or in areas with high groundwater may require additional engineering and agronomic considerations to meet the requirements of the CAFO GP. However, a complete ban on waste storage facility placement within a 100-year floodplain or in areas with documented high groundwater is not supported by the Water Quality Act. However, CAFOs are subject to any applicable local floodplain regulations. CAFOs should not discharge to groundwater because of liners in their livestock waste control facilities (Section II.C) and agronomic uptake in the land application sites. If an operator cannot protect water quality, they cannot obtain authorization under the CAFO GP and must seek an individual permit.

No change was made to the permit in response to this comment.

Comment 12: Andrea Feige et al.

The permit contains little discussion about where approved CAFO permits are located, or may be located, and where they may dispose of their wastes. DEQ should not approve any CAFO permit, or allow waste disposal, proximate to perennial or intermittent surface waters, in areas with shallow groundwater, or areas with known Karst geology or limestone geology. DEQ should also further explain its criteria for allowing CAFO permits and manure disposal for operations near waterways already on the 303d List for nutrients or pathogens, or in locations directly upgradient to such impaired waterways.

Response to Comment 12:

See response to Comment 11. DEQ agrees operating a CAFO in the mentioned areas may require additional engineering and agronomic considerations to meet the requirements of the CAFO GP. There may also be certain situations where an individual permit is necessary. However, a complete ban on operation within certain locations ignores Montana's complicated geology, where formations may be thousands of feet underground or below impervious shales and igneous formations.

The CAFO GP incorporates 17.30.1334(3)(a), which contains specific requirements for CAFOs located near impaired waterbodies.

No change was made to the permit in response to this comment.

Comment 13: Andrea Feige et al.

Ban Wet Weather/Snow Manure Applications. The 2018 draft CAFO GP leaves Montana in a dwindling, minority group of states that still allow winter and wet-weather manure disposal despite the practice's proven risks. Many states ban such applications and restrict it in ways more consistent with the goals of the CWA because wet-weather and snow application of manure is often linked to runoff and contamination of water resources. The best solution for Montana and its citizens is for the CAFO General Permit to ban winter and wet-weather applications of manure.

Response to Comment 13:

The CAFO GP incorporates 17.30.1334(7), which says manure cannot be land applied on flooded or saturated soil (Section II.D.7). A complete prohibition on any wet weather land application is not supported by the Water Quality Act or applicable administrative rules. Precipitation events vary in intensity leading to situations where soils are not saturated so crop uptake of nutrients could occur even though there has been precipitation. Also, CAFOs avoid land application in wet weather because expensive equipment can get stuck or broken, and farmers view manure and wastewater as precious resources in the dry environment and soils commonly found in Montana, not a waste to be disposed whenever possible. The CAFO GP requires livestock waste control facilities to have at least 180-day storage capacity to allow CAFOs to store waste and not land apply when conditions are not conducive for plant uptake. Land application practices and BMPs must be noted in the CAFO's NMP, which is reviewed by DEQ and made available for public review and comment pursuant to Section I.G of the permit. Section III.D of the CAFO GP requires the CAFO operator to record all weather conditions before, after and during land application for DEQ inspectors to determine if land application was appropriate. The CAFO GP also requires CAFOs notify DEQ of any discharge, including from land application sites.

No change was made to the permit in response to this comment.

Comment 14: Montana Department of Transportation

If the discharges impact the drainages near MDT facilities (1 mile), MDT requests the opportunity to review and comment to determine if there are adverse impacts to MDT drainage facilities.

Response to Comment 14:

Every NOI/NMP is made available for public review and comment pursuant to Section I.G of the permit. MDT is free to review and comment if they find a potential discharge from a facility may impact drainages near MDT facilities.

DEQ agrees to place a courtesy call to MDT in the event DEQ receives discharge notification and ascertains that discharge from a permitted CAFO adversely impacts drainages within 1 mile of MDT facilities.

No change was made to the final permit in response to this comment.

Comment 15: Upper Missouri Waterkeeper, Center for Food Safety, Food & Water Watch, Socially Responsible Agriculture Project (Commenters)

Summary of Comment 15A:

Representative monitoring is legally required and necessary to protect Montana waters. Without monitoring, the CAFO GP is largely unenforceable and state waters are left vulnerable to a host of CAFO pollutants.

The CAFO GP lacks production area monitoring. The Montana Permit allows for a continuous discharge rate of pollutants from CAFO storage lagoons, similar to those NRCS standards. This pollution can then contaminate groundwater and subsequently discharge into hydrologically connected surface waters.

The CAFO GP lacks land application area monitoring.

Response to Comment 15A:

See response to Comments 1, 5, 8A.

No change was made to the permit in response to this portion of the comment.

Summary of Comment 15B:

DEQ has an affirmative duty to protect Montanans' fundamental right to a clean and healthful environment. DEQ must issue a CAFO Permit that satisfies its affirmative duty under the Montana Constitution, Article II, Section 3, to guarantee citizens their inalienable right to a "clean and healthful environment." The Montana Environmental Policy Act ("MEPA") effectuates this constitutional mandate, which is further informed by the Montana Water Quality Act and its MPDES program.

DEQ's CAFO pollution permit actions must be guided by Article II, Section 3 and Article IX, Section 1 of the Montana Constitution.

DEQ created Circular DEQ-9 specifically to address the pollution impacts of CAFOs and is part of DEQ's efforts to meet its obligations to Montanans. But any permitting regime capable of satisfying DEQ's duty or truly implementing Circular DEQ-9 must include accountability and enforceability. Without representative monitoring, the CAFO Permit falls flat because the MPDES program "fundamentally relies" on monitoring and public reporting of monitoring results.

Response to Comment 15B:

The Montana Legislature recognized its constitutional obligations under Mont. Const. art. II, § 3, and art IX, by adopting the Montana Water Quality Act, which provides: "the requirements of this chapter provide adequate remedies for the protection of the environmental life support system from degradation and provide adequate remedies to prevent unreasonable depletion and degradation of natural resources. A purpose of this chapter is to provide additional and cumulative remedies to prevent, abate, and control the pollution of state waters." See § 75-5-102, MCA. The conditions of the CAFO GP comply with the federal Clean Water Act and regulations adopted under that Act at 40 CFR Parts 122 & 412 and the Montana Water Quality Act and administrative rules adopted thereunder at ARM 17.30.1330 & 1334, as well as other environmental regulation including the state's nondegradation policy. Compliance with the CAFO GP will protect the quality of state waters from CAFO point source discharges.

Circular DEQ-9 entitled *Technical Standards for Concentrated Animal Feeding Operations* was superseded by ARM 17.30.1334 and by ARM 17.30.1343(1)(c), which provides any permit issued to a CAFO must include the requirements in 40 CFR 122.42(e).

No change was made to the permit in response to this portion of the comment.

Summary of Comment 15C:

DEQ must require public reporting of any existing or added monitoring provisions, including all inspections or visual monitoring that DEQ intends to satisfy the monitoring mandate. For example, the results and details of daily visual inspections of production area water lines must be publicly reported in discharge monitoring reports or a similar mechanism.

Commenters recognize that the CAFO GP requires recordkeeping and that those records may be requested by DEQ and then the public, but this places an unreasonable burden on citizen enforcers. Commenters request that DEQ require permitted CAFOs to publicly report the results of all monitoring, including the details of any inspections serving as monitoring.

Response to Comment 15C:

DEQ requires facilities to report all monitoring results in the permittee's Annual Report. All monitoring data is publicly available in DEQ records or online at EPA's ECHO website.

No change was made to the permit in response to this portion of the comment.

Attachment 1: List of Commenters

No.	Name	City	State
1	Amy van Saun	Portland	OR
2	Andrea Feige		
3	Anna Brewer		
4	Anne Millbrooke		
5	Annick Smith	Bonner	MT
6	Ashlen Busick	Claymont	DE
7	Barbara Kauffman	Kalispell	MT
8	Benjamin Stevens		
9	Beth Ikeda	Missoula	MT
10	Billy Angus	Hamilton	MT
11	Brian Chaszar		
12	Brian Sparks	Livingston	MT
13	Caroline Sévilla		
14	Cat Woodson	Helena	MT
15	Cathleen Reese	Hamilton	MT
16	Chris Knott		
17	Claire Trauth	Stevensville	MT
18	Curtis Kruer		
19	Dan Struble	Livingston	MT
20	Darryl Wrona	Billings	MT
21	Dean Chavooshian		
22	Debra Henriksen	Livingston	MT
23	Douglas Rohn		
24	Elisabeth Bechmann		
25	Elizabeth Madden	Bozeman	MT
26	Ellen Feaver	Helena	MT
27	Emma Meeker	Bozeman	MT
28	Erich Pessl		
29	Erik Makus	Helena	MT
30	Faith DeWaay	Butte	MT
31	Francesca Droll	Bigfork	MT
32	Gail Foresman-Plumb	Bozeman	MT
33	Gail Richardson		
34	Gail Souther	Hamilton	MT
35	Gerry Rhoades	Billings	MT
36	Gloria Phillip	Missoula	MT
37	Gregory Thomas	Helena	MT
38	Gretchen Grayum	Helena	MT
39	Guy Alsentzer	Bozeman	MT

40	H McFadden	Bozeman	MT
41	James Barngrover	Helena	MT
42	Jane Torok	Bozeman	MT
43	Janean Marie Koebbe	Billings	MT
44	Janet Lyon	Missoula	MT
45	Jani Sena	Helena	MT
46	Janice Haugen	Bozeman	MT
47	Jaq Quanbeck	Billings	MT
48	Jean Riley	Helena	MT
49	Jenna Fallaw	Bozeman	MT
50	Jerry DiMarco	Bozeman	MT
51	Jill Davies	Victor	MT
52	Jim Dawson		
53	John Dunkum	Missoula	MT
54	John Richardson		
55	John Taylor	Missoula	MT
56	Jonathan Scott		
57	Joshua Gallatin	Bozeman	MT
58	Josie Fleck	Brady	MT
59	K.G.H. Nicholes	Martinsdale	MT
60	Kelly Baraby	Jefferson City	MT
61	Kelly Campeau	Helena	MT
62	Kerry Krebill	Clancy	MT
63	Kevin Boileau	Missoula	MT
64	Lori Busch		
65	Mark Nelson	Ronan	MT
66	Marta Cramer	Billings	MT
67	Martine Massa	Nice	France
68	Mary Regnier	Emigrant	MT
69	Melanie West		
70	Melenie Lopane	Helena	MT
71	Meredith Sudborough	Butte	MT
72	Michael Emery	Missoula	MT
73	Mike Lu	Austin	TX
74	Neva Bentley		
75	Patricia Simmons		
76	Rachel Corley		
77	Raleigh Koritz		
78	Robert Nowak		
79	Rochelle Gravance	Columbus	MT
80	Roni Bollinger	Absarokee	MT

81	Roy Heffern	St Ignatius	MT
82	Royce Gorsuch		
83	Ruth Swenson	Helena	MT
84	Sally Stansberry	Missoula	MT
85	Sasha Abrahamson	Missoula	MT
86	Sasha Abrahamson	Missoula	MT
87	Scott Merrell	Thompson Falls	MT
88	Scotty Hall		
89	Stanley Rose	Missoula	MT
90	Susan McClure	Bozeman	MT
91	Toby Swank		
92	Tyler Lobdell	Washington, D.C.	