



4600 Giant Springs Road  
Great Falls, MT 59405  
406-454-5840

January 27, 2020

Sandor Hopkins  
Cascade County Planning Department  
121 4<sup>th</sup> St. N., Suite 2H/I  
Great Falls, Montana 59401

**Re: Special Use Permit 016-2019 – Silver Falls Distillery**

Dear Mr. Hopkins:

As the state agency providing stewardship of Montana's fish, wildlife, parks and recreational resources, Fish, Wildlife and Parks (FWP) is tasked with reviewing proposed projects and activities such as this one and providing information and recommendations to help decision-makers reduce potential impacts to these resources. We hope the information we provide is useful for Cascade County's review of the Silver Falls Distillery on Madison Food Park, LLC's property.

Similar to earlier comments we made regarding the proposed Madison Food Park and the Big Sky Cheese applications, our primary focus is on how the project might impact the amount and quality of water in area streams and rivers that provide fish and wildlife habitat, as well as possible impacts to recreational opportunities. It is in this light that we have reviewed the current application and continue to recommend that the county consider the cumulative impacts of these projects by Madison Food Park. We understand this project is in the early planning stages and would eventually require state permits as the project progresses. When the applicant applies for permits, FWP will also provide input to the permitting agencies.

The Silver Falls Distillery proposes to tap the Madison Aquifer for an annual volume of 1.25-1.53 acre-feet per year. While this amount is relatively small, when considered with the immediately adjacent Big Sky Cheese operation on Madison Food Park property that proposed using 10.3 acre-feet per year, this represents a total of 11.55-11.83 acre-feet per year, exceeding the 10-acre-foot combined appropriation limit for wells exempt from the regular water right permitting process. While this proposed water use is nowhere near the 2,836 acre-ft per year that was being proposed for the Madison Food Park, which is still pending and being amended by the applicant according to the Cascade County Planning website, this is still a significant withdrawal of water even for a prolific aquifer such as the Madison, particularly considering the ongoing development of the Madison Aquifer in the Great Falls area by small wells exempt from regular water right permitting. We recommend Cascade County Planning Division consider the cumulative impacts to water development on the Madison Aquifer by the Madison Food Park

and their lessees, and other developments.

The Madison Aquifer is the source of water for Giant Springs. The proposed water use of the Madison Aquifer water by Big Sky Cheese, Silver Springs Distillery, and future water use by the larger Madison Food Park project could impact the output of Giant Springs and should be considered in your decision-making process. If the project moves forward, the nature and extent of this impact should be closely monitored and evaluated as Giant Springs supplies water to the Giant Spring Trout Hatchery, Giant Springs State Park, the Malteurop malt processing facility, Source Giant Springs water bottling plant and as part of the North West Power water rights for power generation. Giant Springs also provides a considerable outflow to the Missouri River. The Missouri River, except during spring runoff, does not meet the existing water demand on the river. Reductions in the Madison Aquifer could negatively impact the ability to supply these vital water uses dependent on Giant Springs.

Not only is Giant Springs important as a water supply to existing water uses, it is the highlight of Giant Springs State Park. The societal and cultural importance should be considered when evaluating any project that would potentially impact Giant Springs hydrologically, ecologically or visually.

Another consideration is that grizzly bears are moving down from the Rocky Mountain Front into the valleys, including the Great Falls area. Based on 2017 observations, grizzly bears may travel through and use the area proposed for Silver Springs Distillery and the Madison Food Park. These bears are part of the North Continental Divide Ecosystem population, which is listed as threatened under the Endangered Species Act. The proposed project should avoid attracting grizzly bears and other wildlife. Please see FWP's Living with Wildlife website (<http://fwp.mt.gov/fishAndWildlife/livingWithWildlife/>) for guidance, such as planting native landscaping that will not act as an unnatural attractant for wildlife such as bears.

The project should also consider the potential for an increase in stormwater and implement appropriate mitigation strategies.

FWP continues to recommend that the Cascade County Planning Division consider cumulative impacts when considering the Silver Springs Distillery application, including potential impacts that may be associated with past and subsequent applications by Madison Food Park and their lessees in this area.

Thank you for the opportunity to offer input. Please contact Gary Bertellotti, Region 4 Supervisor, at (406) 454-5840, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Bertellotti", written in a cursive style.

Gary Bertellotti  
Regional Supervisor