



beneficial economic impact on the local economy, through their expenditures for fuel, motels, food and drinks, shopping, etc.

A further economic benefit is found in the local economic spillover from Bowdoin's annual operating budget. Employee salaries and non-salary refuge expenditures (maintenance and operations) also greatly benefit the local community, county, and state in the form of income, jobs, taxes, and personal spending. In Phillips County, Bowdoin NWR's 2004 annual budget generated a total of \$806,700 in economic output, 8.6 jobs, \$411,600 in job income, and \$163,500 in taxes.

Montana believe the primary objective of the International Joint Commission (IJC) is to define how each country can optimize its entitlement as defined by the IJC 1921 Order. The 1921 IJC Order that implements the 1909 Boundary Waters Treaty entitle the U.S. to an average of 45% of the combined flows of the Milk and St. Mary Rivers and Canada to an average of 55%. In reality and based on historical records, Montana receives an average of 41% of the combined flows, whereas Canada receives 59% of the combined flows.

The only way the U.S. can receive its 45% entitlement with its existing infrastructure is to go to an annual balancing or apportionment period, rather than the existing 15/16 day balancing period. Montana supports an annual balancing period, as it would allow the U.S. to take most, but not all of its annual entitlement and still maintain an instream flow downstream of Sherburne Reservoir and an instream flow at the International Border. The existing 15/16 accounting period is too short for the U.S. to optimize its operations with its existing infrastructure. Under an annual accounting period Canada would receive a greater percentage increase in Milk River water and its entitlement than the U.S. would receive from the St. Mary River.

Reduced water allotments would be detrimental to the economy of this basin, agriculture, municipalities, outdoor recreational opportunities, and the sustainability of healthy fish and wildlife populations. A resolution on the fair and equitable entitlement of Milk and St. Mary River waters between the U.S. and Canada is essential for all users in the U.S. and Canada and for fish and wildlife populations that depend on it.

Sincerely,

A handwritten signature in cursive script that reads "Carmen R. Luna".

Carmen R. Luna  
Refuge Manager