IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BUTTE DIVISION

COTTONWOOD ENVIRONMENTAL)
LAW CENTER, et al.) Case No. 2:21-CV-00093-BMM
Plaintiffs, vs. YELLOWSTONE MOUNTAIN CLUB, LLC	DECLARATION OF MIKE ENGLAND
Defendant.	

- I, Mike England, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- 1. I have personal knowledge of the matters stated herein and, if called as a witness, would competently testify.
- 2. I submit this declaration on my own behalf and as a member of Cottonwood Environmental Law Center (Cottonwood).
- 3. I am a resident of Bozeman, Montana.
- 4. I have been a member of Cottonwood for about a year.
- 5. I am the primary owner of Outside Bozeman magazine and Outside Media Group, LLC.

- 6. Outside Bozeman employs several people and contractors. We publish a quarterly magazine that showcases Montana's natural beauty and recreational bounty, including the Gallatin River.
- 7. The Yellowstone Club's unlawful discharges of water pollution into the South Fork of the West Fork of the Gallatin River adversely affects Outside Bozeman's business. Our primary revenue is from advertisers, many of whom depend on a clean, clear, unpolluted Gallatin River for their revenue and thus advertising budget.
- 8. Outside Bozeman's staff and I do not want to float, fish, or swim in the Yellowstone Club's water pollution.
- 9. The Yellowstone Club's unlawful discharges suggest that it cannot properly dispose of the wastewater they are currently producing. The Yellowstone Club should be stopped from building more vacation houses when it cannot lawfully dispose of the effluent they already produce. Allowing the Yellowstone Club to continue building and adding new sewer connections will only exacerbate the existing pollution problem and harm my conservation interest in maintaining and restoring the water quality of the Gallatin River and its tributaries.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 13th day of December, 2021.

Mike England