



Montana. Environmental  
Quality Council

ENVIRONMENTAL IMPACT STATEMENT  
GUIDELINES. REVISED

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 Montana. Environmental Quality Council  
 Environmental impact statement  
 guidelines

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Montana Environmental Council  
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# Environmental Quality Council

ENVIRONMENTAL QUALITY COUNCIL  
1000 EAST WASHINGTON  
HELENA, MONTANA 59601

September 21, 1973

MEMO

To: State Department Directors, Agency Heads, and University System Presidents  
From: Environmental Quality Council (EQC)  
Subject: REVISED ENVIRONMENTAL IMPACT STATEMENT GUIDELINES

The enclosed guidelines supercede the guidelines adopted by the EQC on July 21, 1972. They are effective immediately. Additional copies are available upon request.

Agencies are advised to study these guidelines and to note the revisions. Some agencies may have to revise their internal procedures to conform with the newly revised guidelines.

Attention is specifically directed to the following sections of the guidelines where substantially new material has been inserted:

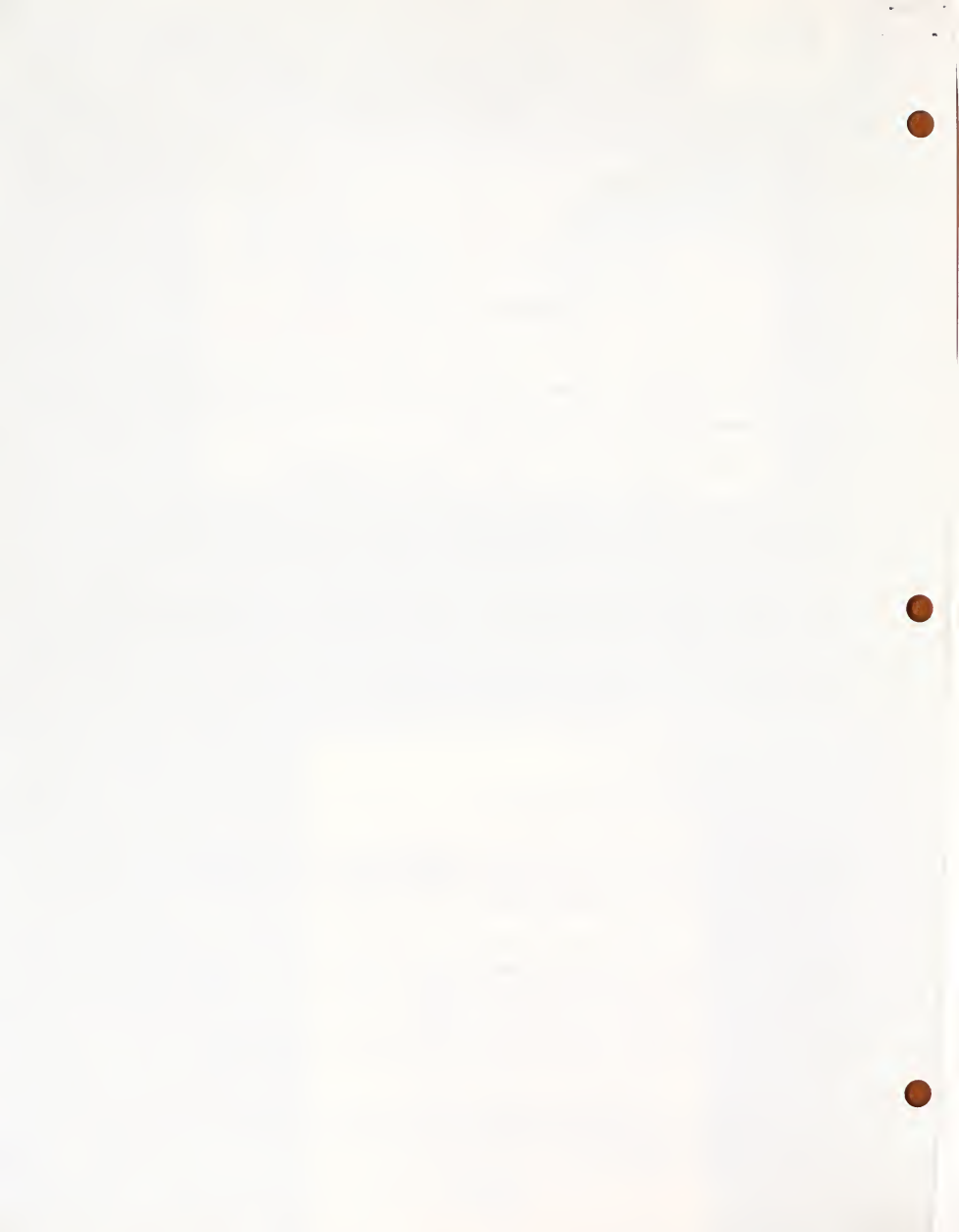
- 1) Section 3.a.(5)
- 2) Section 5. b.
- 3) Section 6. a.
- 4) Section 8. b.; e; and f.
- 5) Appendices II & III

It is the intention of EQC to continually strive for greater clarity and simplicity in the guidelines in order to enable agencies to fulfill their obligations under MEPA and to facilitate the integration of MEPA into forthcoming plans and decision making.

The EQC welcomes comments on the guidelines at any time. Indeed, we need input from agencies in order to shape the guidelines into a realistic and working implementation of the policy expressed in MEPA.

And, perhaps it would be well here to briefly re-state the major tenets of MEPA. The Act declares a state environmental policy, the purposes of which are:

first, to encourage harmony between man and his environment;  
second, to prevent and eliminate environmental degradation; and  
third, to enrich our understanding of ecological systems and natural resources.





ENVIRONMENTAL QUALITY COUNCIL  
State Capitol Building  
Helena, Montana

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REVISED GUIDELINES FOR ENVIRONMENTAL IMPACT STATEMENTS  
REQUIRED BY THE MONTANA ENVIRONMENTAL POLICY ACT OF 1971  
ADOPTED BY ENVIRONMENTAL QUALITY COUNCIL, SEPTEMBER 14, 1973

PLEASE RETURN

1. PURPOSE

The purpose of Section 69-6504(b)(3) of the Montana Environmental Policy Act (MEPA) and of these guidelines is to incorporate into the agency decision-making process careful and thorough consideration of the environmental effects of proposed actions, and to assist agencies in implementing MEPA in a uniform, deliberate and systematic manner.

2. POLICY

- a. As early as possible and in all cases prior to any agency decision concerning major action or recommendation or a proposal for legislation that significantly affects the environment, State agencies shall, in consultation with other appropriate agencies and individuals, in both the public and private sectors, assess in detail the potential environmental impact in order that adverse effects are avoided and environmental quality is maintained, enhanced, or restored to the fullest extent practicable. In particular, it is especially important that alternative actions that will minimize adverse impacts shall be explored, and both the long and short range implications upon the human environment and upon nature shall be evaluated in order to avoid, to the fullest extent practicable, undesirable consequences for the environment as a whole.

The language in Section 69-6504 is intended to assure that all agencies of the State shall comply with the directives set out in said Section "to the fullest extent possible" under their statutory authorizations and that no agency shall utilize an excessively narrow construction of its existing statutory authorizations to avoid compliance.

- b. The term "human environment" shall be broadly construed to include not only social, economic, cultural, and aesthetic factors, but also, and particularly, the biophysical properties of natural ecosystems, including plants, humans, and other animals, their relationship to each other, and with all environmental components of air, water, and land.

### 3. AGENCY PROCEDURES

- a. Each agency shall establish its own formal procedures for:
- (1) Identifying those agency actions and decisions requiring environmental statements, the appropriate time prior to decision for the consultation required by Section 69-6504 (b)(3) and the agency review process for which environmental statements are to be available;
  - (2) Obtaining information required in the preparation of environmental statements;
  - (3) Designating the officials who are to be responsible for the environmental statements;
  - (4) Consulting with and taking account of the comments of appropriate agencies, private groups, and the public, whether or not an environmental statement is prepared;
  - (5) Preparing draft environmental statements.
- (a). In accordance with the policy of MEPA, agencies have a responsibility to develop procedures to provide to the public timely information and explanation of plans and programs with environmental impact in order to obtain the views of any interested parties. Initial assessments of the environmental impacts of proposed action shall be undertaken concurrently with initial technical, energy use, and economic studies, and when required, a draft environmental impact statement shall be prepared and circulated for comments in time to accompany a proposal through the agency review process. During the process, agencies shall:
- (1) Make provision for the circulation of draft statements to other appropriate agencies, selected private groups and individuals, and for their availability to the public. (Where an agency has an established practice of declining to favor an alternative until public comments on a proposed action have been received, the draft environmental statement may indicate that two or more alternatives are under consideration.);
  - (2) Give careful consideration to the comments elicited from the aforementioned sectors; and
  - (3) Issue final environmental impact statements which clearly evidence a responsiveness to such comments. The purpose of this assessment and consultation procedure is to provide agencies, other decision-makers, and the public with an understanding of the potential environmental effects of proposed actions.

Agencies should attempt to balance the results of their environmental assessments with their assessments of the net economic, technical, and other benefits of proposed actions, and use all practicable means to avoid or minimize undesirable consequences for the environment.

- (b). If an agency relies on an applicant for the submission of initial environmental information, the agency shall assist the applicant by outlining the type and quality of information required. In all such cases, the agency must make its own determinations on the applicant's evaluation of the environmental issues and the agency must assume responsibility for the scope and content of draft and final environmental statements.
- (6) Meeting the requirements of Section 69-6504(b)(3) for providing timely public information on plans and programs with environmental impact, including procedures responsive to Section 8 of these guidelines. These procedures should be consistent with the guidelines contained herein. Each agency should file a copy of all such procedures with the Environmental Quality Council (EQC) which will provide advice to agencies in the preparation of their procedures and guidance on the application and interpretation of the Council's guidelines.

In addition, it is suggested that each agency prepare a flow chart outlining its EIS procedure. The flow chart should include all points of review and decision-making, and divisions of individual responsibility. See sample attached as Appendix III.

#### 4. STATE AGENCIES INCLUDED

Section 69-6504(b)(3) applies to all agencies of the State government. Each agency shall comply with the requirements unless the agency demonstrates that existing law applicable to its operations expressly prohibits or makes compliance impossible.

#### 5. ACTIONS INCLUDED

The following criteria shall be employed by agencies in deciding whether a proposed action requires the preparation of an environmental statement.

a. Actions include, but are not limited to:

- (1) Recommendations or favorable reports relating to legislation, including that for appropriations. The requirement for following Section 69-6504(b)(3) procedure as discussed in these guidelines applies to both:
  - (a). agency recommendations on their own proposals for legislation; and

- (b). agency reports on legislation initiated elsewhere. (In the latter case only the agency which has primary responsibility for the subject matter involved will prepare an environmental impact statement.)
  - (2) Projects, programs, and continuing activities: directly undertaken by state agencies; supported in whole or in part through state funds or involving a state lease, permit, license, certificate or other entitlement for use;
  - (3) Policy, regulations, and procedure making.
- b. The statutory clause "major actions of State government significantly affecting the quality of the human environment" shall be construed by agencies from the perspective of the overall, cumulative impact of the action proposed (and of further actions contemplated). Such actions may be localized and seemingly insignificant in their impact, but if there is a potential that the environment may be significantly affected, the statement shall be prepared.

In deciding what constitutes "major action significantly affecting the environment," agencies should consider that the effect of many State decisions about a project or a complex of projects can be individually limited but cumulatively considerable. By way of example, two suitable illustrations can be drawn: (1) one or more agencies, over a period of years, commits minor amounts of resources at any single instance, but the cumulative effect of those individually minor commitments amounts to a major commitment of resources, or (2) several government agencies individually make decisions regarding partial aspects of a major action. The guiding principle is that the whole can be greater than the sum of the parts. The lead agency shall prepare an environmental impact statement if it is foreseeable that a cumulatively significant impact on the environment will arise from State action. "Lead agency" refers to the State agency which has primary authority for committing the State government to a course of action with significant environmental impact. As necessary, the Environmental Quality Council will assist in resolving questions of lead agency determination.

Finally, the determination of what constitutes "major action significantly affecting the human environment" will unavoidably involve considerable judgment on the part of the responsible agency. To assist in that judgment, the following points should be general considerations (but not viewed as final determinants):

- (1) Is the action under consideration the first or the only governmental decision to be taken on the proposal?
- (2) Is the action decisive; could it substantially change the nature of the proposal, stop the proposal, or allow it to proceed to full implementation?
- (3) Is the action expected to have direct statewide or regional implications?



- (4) Is the action fixed for a certain period of time not to be modified except under new conditions not previously known, or conditions of an emergency nature?
  - (5) Does the action deal with environmental conditions (physical, social, biological) which have been clearly recognized as being endangered, fragile, or in severely short supply; or clearly approaching a precarious level of quality, hardship, or public safety?
  - (6) Is the action intended as environmentally regulatory or protective?
  - (7) Does the action involve considerable expenditure?
  - (8) Would environmental conditions be substantially altered in terms of size, quality, well-being, availability, or type of use?
  - (9) Would environmental conditions be affected over a large geographical area?
  - (10) Would environmental effects be beneficial, adverse or both?
  - (11) Would environmental effects be short-term, long-term, or permanent?
  - (12) Would environmental effects be reversible?
  - (13) Will the action involve a reasonably important "segment" of opinion in a controversy?
- c. When an agency responsible for the issuance of a state lease, permit, license, certificate, or other entitlement for use, should be able to foresee that the issuance of a large number of such entitlements will, cumulatively, have a significant impact upon the environment, an environmental impact statement shall be prepared. Normal agency procedures, as delineated in Section 3 above, shall be used in the preparation of such an impact statement. Information supplied by applicants for these entitlements may be used or considered in the preparation of an impact statement, but such information may not be submitted by itself in place of an impact statement.
- d. Section 69-6504 of the MEPA indicates the broad range of aspects of the environment to be surveyed in any assessment of significant effect. The MEPA also indicates that adverse significant effects include those that degrade the quality of the environment, and curtail the range of beneficial uses of the environment, and serve short-term, to the disadvantage of long-term, environmental goals. Significant effects can also include actions which may have both beneficial and detrimental effects, even if, on balance, the agency believes that the effect will be beneficial. Significant adverse effects on the quality of the human environment include both those that directly affect human beings and

those that indirectly affect human beings through adverse effects on the environment.

## 6. CONTENT OF ENVIRONMENTAL STATEMENT

a. The following points are to be covered:

- (1) A description of the proposed action including information and technical data adequate to permit a careful assessment of environmental impact by commenting agencies and the public. The amount of detail provided in such descriptions should be commensurate with the extent and expected impact of the action, and with the amount of information required at the particular level of decision making (planning, feasibility, design, etc.).
- (2) The probable impact of the proposed action on the environment, including impact on ecological systems. Both primary and secondary significant consequences for the environment shall be included. A primary impact is one which generally results from a project input; a secondary impact is one which generally results from a project output. Primary impacts are usually more susceptible to measurement and analysis by an agency proposing an action because the primary impacts are more immediately related to an agency's area of responsibility and expertise. Secondary impacts, on the other hand, usually require analyses by a number of agencies because they are not within any single agency's area of responsibility or expertise.
- (3) Any probable adverse environmental effects which cannot be avoided, should the proposal be implemented. If there are adverse environmental effects which are unavoidable, mitigative measures shall be proposed to minimize such adverse environmental impact.
- (4) Alternatives to the proposed action;

Section 69-6504(b)(4) requires the responsible agency to "study, develop, and describe appropriate alternatives to recommend courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." A rigorous exploration and objective evaluation of alternative action (including no action at all) that might avoid some or all of the adverse environmental effects is essential. In addition, there should be an equally rigorous consideration of alternatives open to other authorities. Sufficient analysis of such alternatives and their costs and impact on the environment should accompany the proposed action through the agency review process in order not to foreclose prematurely options which might have less detrimental effects.

- (5) The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term effects from the perspective that each generation is trustee of the environment for succeeding generations.

- (6) Any irreversible and irretrievable commitments of natural and economic resources (including energy resources) which would be involved in the proposed action should it be implemented. This requires the agency to identify the extent to which the action curtails the range of alternative and beneficial uses of the environment.
  - (7) A discussion of problems and objections raised by other agencies and by private organizations and individuals in the review process where appropriate and the disposition of the issues involved.
  - (8) Insofar as it is practicable, a balancing of the economic benefits to be derived from a proposal with economic costs and environmental costs.
  - (9) Discussion of potential growth-inducing aspects of the proposed action.
  - (10) A listing of all agency personnel having chief responsibility for the preparation of the statement; a brief account of the formal education, training, and professional experience of such personnel; and a description of the sources of data, research or field investigation on which the statement and its conclusions are based.
- b. Each environmental statement shall be prepared in accordance with the precept in Section 69-6504(b)(1) that all agencies "utilize a systematic, inter-disciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and decision making which may have an impact on man's environment."
  - c. Agencies which are required to submit statements under Section 102(2)(c) of the National Environmental Policy Act may, with EQC approval, substitute copies of that statement in lieu of the Section 69-6504(b)(3) requirement of the MEPA.
  - d. Appendix I prescribes the form of the draft environmental statement.
  - e. Appendix II suggests environmental values to be considered in connection with the preparation of impact statements.
7. STATE AGENCIES TO BE CONSULTED IN CONNECTION WITH PREPARATION OF ENVIRONMENTAL IMPACT STATEMENTS

A state agency considering an action requiring an environmental statement for which it takes primary responsibility shall consult with and obtain the comment on the environmental impact of the action of state agencies or institutions with jurisdiction by law or special expertise with respect to any environmental impact involved.

In addition, any state agency responsible for a draft environmental statement may seek comment from appropriate federal and local agencies, from private individuals, organizations and institutions, and in particular from private parties whose interests are likely to be significantly affected by the proposed action.

Agencies seeking comment shall determine which one or more of the agencies or institutions are appropriate to consult on the basis of the areas of expertise. It is recommended that these agencies and institutions establish contact points for providing comments on the environmental statements and that departments from which comment is solicited coordinate and consolidate the comments of their component entities. It is further recommended that each agency establish a "fund file" of expertise available from the public and private sectors. The requirement in Section 69-6504(b)(3) to obtain comment from state agencies having jurisdiction or special expertise is in addition to any specific statutory obligation of any state agency to coordinate or consult with any other agency. Agencies seeking comment shall establish time limits of not less than thirty (30) days for reply, after which it may be presumed, unless the agency consulted requires a specified extension of time, that the agency consulted has no comment to make. Agencies seeking comment should endeavor to comply with requests for extensions of time up to fifteen (15) days. Failure of EQC to publicly comment on any agency's environmental statement does not imply tacit approval of that agency action.

8. USE OF STATEMENTS IN AGENCY REVIEW PROCESSES: DISTRIBUTION OF ENVIRONMENTAL QUALITY COUNCIL: AVAILABILITY TO PUBLIC

- a. Agencies will need to identify at what state or stages of a series of actions relating to a particular matter the environmental statement procedures of these guidelines will be applied. It will often be necessary to use the procedures both in the development of a state program and in the review of proposed projects within the program. The principle to be applied is to obtain views of other agencies and the public at the earliest feasible time in the discussion and development of program and project proposals. Care should be taken to avoid duplication but when action is considered which differs significantly from other actions already reviewed pursuant to Section 69-6504(b)(3) of the MEPA, an environmental statement shall be provided.
- b. Two (2) copies of draft environmental statements, and two (2) copies of the final text of environmental statements (if prepared) together with all comments received thereon by the responsible agency from all other agencies and from private organizations and individuals, shall be supplied to the office of the Executive Director of the Environmental Quality Council. It is important that draft environmental statements be prepared and circulated for comment and furnished to the Environmental Quality Council, the Governor, and the public at the earliest possible point in the agency review process in order to permit meaningful consideration of the environmental issues before an action is taken. It is not the intent of the MEPA that the environmental statement be written to justify decisions already made. No administrative action subject to Section 69-6504(b)(3) shall be taken sooner than sixty (60) days after a draft environmental statement has been circulated for comment, furnished to the Council and except where advance public disclosure will result in significantly increased costs of procurement to the government, made available to the public pursuant to these guidelines. If the originating agency has a full and good faith consideration of

the environment in its plans, and if this is reflected in favorable comments from review agencies and the public, the draft statement may be considered as satisfying the requirement of MEPA for a detailed statement. Agencies satisfying the requirement of MEPA with the draft statement must submit two (2) copies of all comments received thereon together with formal notification of the final decision on the proposed action. Agencies must furnish the same information (final decision and all comments on draft) to all commenting entities, whether public or private, as a logical termination to the process. In cases where the final environmental statement is required administrative action shall not be taken sooner than thirty (30) days after the final text has been made available to the Council and the public. If the final text of an environmental statement is filed within sixty (60) days after a draft statement has been circulated for comment, furnished to the Council and made public pursuant to this section of these guidelines, the thirty (30) day period and sixty (60) day period may run concurrently to the extent that they overlap.

In those instances where an agency has, after careful consideration, concluded that a proposed action or project does not require the preparation of a final environmental impact statement, the EQC, through the office of the Executive Director, may, upon request from the agency, remove any further time restrictions for the implementation of such agency actions or projects.

- c. With respect to recommendations or reports on proposals for legislation to which Section 69-6504(b)(3) applies, a draft environmental statement may be furnished to the appropriate legislative committee and made available to the public pending transmittal of the comments as received and the final text, if required.
- d. All agencies shall make available to the public all the reports, studies, and other documents that may and should underlie the draft and final impact statements and comments.
- e. Where emergency circumstances make it necessary to take an action with significant environmental impact without observing the provisions of these guidelines concerning minimum periods for agency review and advance availability of environmental statements, the agency proposing to take the action shall consult with the EQC about alternative arrangements. It is important that the agency provide the EQC with a precise, factual statement detailing the nature of the emergency, and the reasons the agency feels it must depart from normal procedural requirements. Similarly, where there are over-riding considerations of expense to the state or impaired program effectiveness, the responsible agency shall consult with the EQC concerning appropriate modifications of the minimum period.
- f. In accord with the MEPA, agencies have an affirmative responsibility to develop procedures to insure the fullest practicable provision of timely public information and understanding of agency plans and programs with environmental impact in order to obtain the view of interested and significantly affected parties.

These procedures shall include, whenever appropriate, provision for public hearings, and shall provide the public with relevant information including information on alternative courses of action. In deciding whether a public hearing is appropriate, an agency should consider: (i) the magnitude of the proposal in terms of economic costs, the geographic area involved, the uniqueness or size of commitment of resources involved, and the amount and types of energy required; (ii) the degree of interest in the proposal, as evidenced by requests from public and from State and local authorities that a hearing be held; (iii) the complexity of the issue and the likelihood that information will be presented at the hearing which will be of assistance to the agency in fulfilling its responsibilities under the Act; and (iv) the extent to which public involvement already has been achieved through other means, such as earlier public hearings, meetings with citizen representatives, and/or written comments on the proposed action. Agencies which hold hearings on proposed administrative actions or legislation shall make the environmental statement available to the public at least thirty (30) days prior to the time of the relevant hearings. Hearings shall be preceded by adequate public notice and information to identify the issues and to obtain the comments provided for in the guidelines and should in all ways conform to those procedures outlined in the Montana Administrative Procedure Act, where applicable, R.C.M. 1947, 82-4201, et. seq.

- g. The agency which prepared the environmental statement is responsible for making the statement and the comments received available to the public, including inter-agency memoranda when such memoranda transmit comments of agencies upon the environmental impact of proposed actions subject to Section 69-6504(b)(3).
- h. Agency procedures prepared pursuant to Section 3 of these guidelines shall implement these public information requirements and shall include arrangements for availability of environmental statements and comments at the head and other appropriate offices of the responsible agency.

9. APPLICATION OF SECTIONS 69-6504(b)(3) PROCEDURE TO EXISTING PROJECTS AND PROGRAMS

The Section 69-6504(b)(3) procedure shall be applied to major state actions having a significant effect on the environment even though they arise from projects or programs initiated prior to enactment of the MEPA on March 9, 1971. Where an agency demonstrates that it is not practicable to reassess the basic course of action, it is still important that further incremental major actions be shaped so as to minimize adverse environmental consequences. It is also important in further action that account be taken of environmental consequences not fully evaluated at the outset of the project or program.

10. SUPPLEMENTARY GUIDELINES, EVALUATION OF PROCEDURES

These revised guidelines reflect the experience of pertinent state agencies and the EQC subsequent to the time the interim guidelines

were issued. It is believed that this experience has made the guidelines more helpful and comprehensive. As more experience is gained, and as more comments are received, these guidelines will, from time to time, be further revised.

Agencies are encouraged to conduct an ongoing assessment of their experience in the implementation of the Section 69-6504(b)(3) provisions of the MEPA and in conforming to these guidelines. The EQC will welcome comments on these areas at any time, but it would especially like to have such comments by December 31, 1973. Such comments should include an identification of the problem areas and suggestions for revision or clarification of these guidelines to achieve effective coordination of views on the environmental factors (and alternatives, wherever appropriate) of proposed actions without imposing unproductive administrative procedures.

APPENDIX I

The environment statement submitted to the Environmental Quality Council should cover the following items:

(Check one) ( ) Draft ( ) Final Environmental Statement

Name of responsible state agency (with name of operating division where appropriate).

Name of action (Check one) ( ) Administrative Action  
( ) Legislative Action

1. Description of action indicating what geographic area or political subdivision is particularly affected.
2. Environmental impact.
3. Adverse environmental effects.
4. List alternatives considered.
5. The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity.
6. Any irreversible and irretrievable commitments of resources.
7. (a) (For draft statements) List all agencies from which comments have been requested.  
(b) (For final statements) List all agencies and sources from which written comments have been received. Discussion of comments and disposition of issues involved.
8. Balance of economic benefits with economic costs and environmental costs.
9. Potential growth-inducing effects.
10. List all agency personnel having chief responsibility for the preparation of the statement; a brief account of the formal education, training, and professional experience of such personnel; and a description of the sources of data, research or field investigation on which the statement and its conclusions are based.
11. Date draft statement and final statement was made available to the Governor, the Environmental Quality Council, and public.

Draft environmental statements should be concise, but in sufficient detail to allow a reviewer with appropriate expertise to grasp the essence of the action and comment intelligently.

In cases where final environmental statements are prepared, this format should be followed considering in detail the points covered in Section 6 of these guidelines.



APPENDIX II

By way of suggestion, but, by no means, by way of limitation, the following are some specific values that could be affected by almost every agency action or program:

TERRESTRIAL AND AQUATIC LIFE

WATER QUALITY, QUANTITY AND DISTRIBUTION

THE TERRESTRIAL AND AQUATIC HABITAT

AESTHETICS AND NATURAL BEAUTY

SOIL QUALITY, STABILITY AND MOISTURE

WILDERNESS VALUES

HUMAN PRESSURES ON RESOURCES

LOCAL AND STATE TAX BASE CONSIDERATIONS

TRANSPORTATION REQUIREMENTS

LAW ENFORCEMENT AND EFFECTIVENESS

DISTRIBUTION AND DENSITY OF PEOPLE

ECONOMIC CONSIDERATIONS (BUSINESS, INDUSTRY, DOLLAR TURNOVER AND  
EMPLOYMENT)

FOOD AND FIBER PRODUCTION

RECREATIONAL OPPORTUNITIES AND QUALITY OF RECREATIONAL EXPERIENCES

INCREASED SUBURBANIZATION, OR URBANIZATION, OR LAKE AND STREAM-SIDE  
DEVELOPMENT

NOISE POLLUTION AND TRANQUILITY, AND ANY OTHER PERTINENT SOCIAL CON-  
SIDERATIONS

HISTORIC AND ARCHEOLOGICAL SITES AND UNIQUE AND NATURAL AREAS

CULTURAL UNIQUENESS AND DIVERSITY

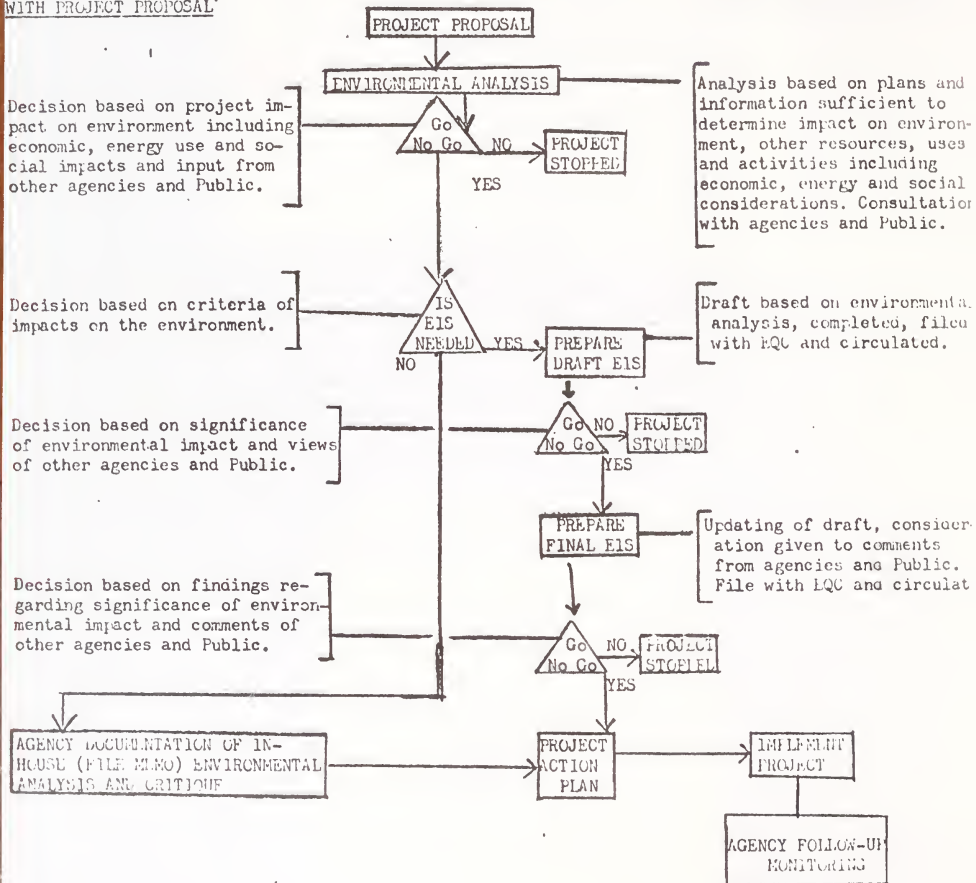
SAMPLE FLOW CHART FOR AGENCY USE IN INCORPORATING SECTION 69-6504 OF  
THE MONTANA ENVIRONMENTAL POLICY ACT INTO DECISION MAKING FOR ALL

MAJOR PROGRAMS

ENVIRONMENTAL ANALYSIS PHASE

DECISION TO PROCEED  
WITH PROJECT PROPOSAL

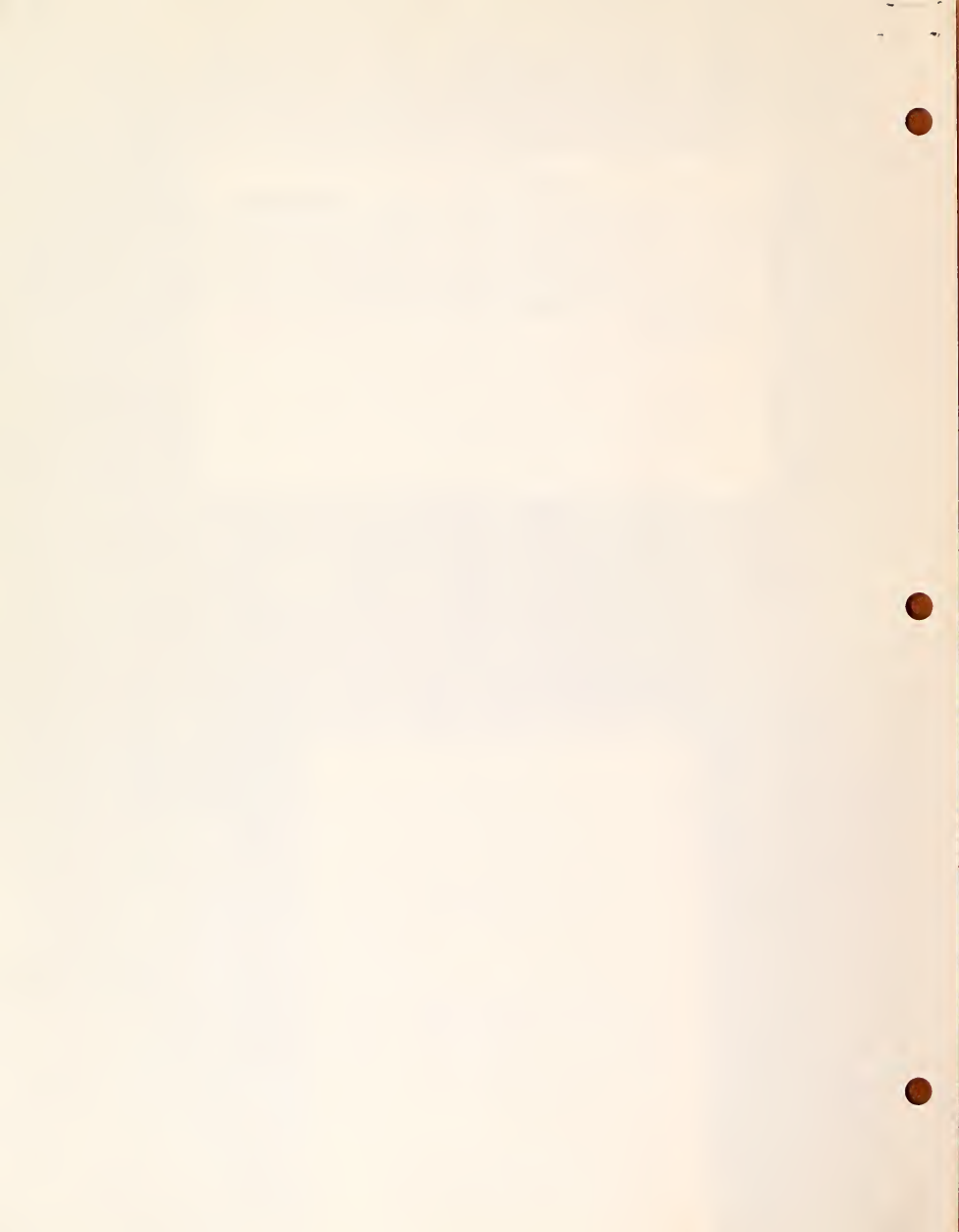
ENVIRONMENTAL ASPECTS



State Department Directors, Agency Heads, and University System Presidents  
September 21, 1973  
Page 2

The guidelines--and the entire environmental impact statement process--are mainly concerned with the second aspect described above. It is no longer acceptable for us to react to environmental degradation after it occurs. Now the emphasis is on prevention and on a planning process that comprehensively and systematically evaluates all consequences of a proposed action and gives equal weight to environmental, social and economic values. With your cooperation and assistance, MEPA will be viewed not as an obstacle, but as an opportunity!

Enc.  
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