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Montana Department of Environmental Quality
1520 E 6th Avenue
Helena, MT 59601

November 28, 2023

Subject: Montana Environmental Policy Act Implementation

Dear Montana Department of Environmental Quality,

Thank you for the opportunity to comment on the implementation of the Montana Environmental Policy Act. In Missoula County, we are already experiencing the impacts of climate change and have identified specific ways in which DEQ through the MEPA process could aid our community in meeting these goals. Whether it is earlier and longer wildfire smoke seasons, our hotter summers, or increased flooding from rain on snow events, our citizens and businesses are experiencing climate change's negative health and economic effects. Given the issue's importance to our constituents, we have taken an active role at the local level to both prepare for and mitigate the impacts of climate change, adopting a 100% Clean Electricity by 2030 resolution in 2019 and a county-wide climate adaptation plan, Climate Ready Missoula, in 2020. We welcome the opportunity to comment on DEQ's analysis of greenhouse gas emissions in the MEPA process, incorporation of new science and associated technologies into the MEPA process, and ongoing efforts to efficiently serve the public through permitting by providing a public forum for public comment.

We would like to urge the state of Montana to include a thorough and robust analysis of greenhouse gas emissions and climate impacts in their evaluation. Increased greenhouse gas emissions will have large economic impacts on our state, and without understanding a project's climate impacts, we cannot make a well-reasoned decision on whether or not the project should proceed. We recognize that these can be complex and challenging assessments, however we believe that the appropriate tools and resources exist right now to enable these types of evaluations. For example, when Missoula County was developing our Climate Ready Missoula plan, we were able to utilize resources such as the Montana Climate Office to understand hyper-local climate projections and anticipated impacts. Montanans are fortunate to have smart and talented research institutions to provide the best available science for our state, and we also have the opportunity to learn from neighboring states who are performing these types of analyses today.

The Environmental Assessment stage can incorporate broadly accepted climate science, such as climate projections and climate impact calculators, to automatically trigger Environmental Impact Statements at certain thresholds or in sensitive airsheds or watersheds. Montana Climate Office datasets can be incorporated into assessments and used to identify thresholds. This is especially important so as to account for non-stationarity, or the concept that historical records do not accurately reflect what will occur in the future, particularly as climate drives increasing variability. Incorporating such variability into statistical analysis more regularly, or accounting for increased climate impacts more generally, would benefit local communities in planning for future resiliency.

We understand that modernizing MEPA is an area of interest. Generally, we support the goal of streamlining processes and administrative language when prudent. However, we are concerned that streamlining may impact the public's ability to comment on the environmental, fish and wildlife, economic, social, and cultural impacts of proposed projects before their approval. It is our view that issues involving MEPA are best served by numerous and varied voices that can bring unique considerations and perspectives to bear. To that end, we encourage you to ensure any attempts at streamlining do not limit what is otherwise appropriate, meaningful, and beneficial participation in relevant proceedings.

As part of modernization of MEPA, we recommend the state adopt use of a digital dashboard or GIS system to help the public access data and allow for integration of other data sets used in broader environmental context. This would help highlight overlapping permitting actions and decisions and allow the public and communities to take a holistic view of the range of existing projects on a watershed or airshed basis, regardless of department or division, as intended by MEPA. Such a system can also incorporate post permitting data to demonstrate a permitted entity is meeting permitting standards.

We appreciate working hand in hand with DEQ to protect our water, air, climate, and communities. Incorporation of a greenhouse gas emission analysis, incorporation of current science and use of a digital dashboard or GIS system, are all improvements to the MEPA process that we would appreciate DEQ considering. Thank you for your consideration of our input. We look forward to work with DEQ to meet State and local goals for current and future citizens.

Sincerely,

Josh Slotnick

Board of County Commissioners
Chair