ALTERNATIVES ANALYSIS GUIDANCE

An adequate alternatives analysis is required to meet ARM 36.17.610(f)[i] MCA 90-2-1112(3)[ii]. An alternatives analysis is crucial for informed decision-making and ensuring projects will not have an adverse environmental impact (see ARM 36.17.610(e) and MCA 90-2-1112(3)).

Below are the key components of an adequate alternatives analysis:

1. Scope and Purpose

- **Clearly defined project purpose and need:** Determine the project's objectives and the reasons for undertaking it.
- **Reasonable range of alternatives:** Consider any option that could potentially meet the project's purpose and need, including:
    - **No-action alternative:** The baseline scenario where the project is not implemented.
    - **Reduced-scale alternatives:** Smaller-scale versions of the proposed action.
    - **Alternative locations:** Different sites for the project.
    - **Alternative technologies or approaches:** Different methods or techniques to achieve the project's goals. **Engineer's materials cost estimates for the same alternative are NOT considered an alternative technology or approach,**
        - For example, the evaluation of different geomembrane materials (HDPE, PVC, EPDM) in an irrigation canal lining project is NOT considered an alternative technology or approach.
    - **Mitigation measures:** Strategies to reduce or avoid potential environmental impacts.

2. Evaluation Criteria

- **Relevant environmental factors:** Identify the key environmental issues that could be affected by the project and its alternatives, such as air quality, water quality, wildlife habitat, cultural resources, and noise.
- **Social and economic factors:** Consider the potential impacts on human health, community well-being, and economic development.
- **Feasibility and practicality:** Assess the technical, financial, and logistical feasibility of each alternative.

3. Comparative Analysis

- **Impact assessment:** Evaluate the potential environmental, social, and economic impacts of each alternative, including both direct and indirect effects.
- **Comparison of alternatives:** Compare the alternatives based on the evaluation criteria, highlighting the strengths and weaknesses of each option.
- **Consideration of mitigation measures:** Assess how mitigation measures could reduce the impacts of each alternative.

4. Decision-Making

- **Selection of the preferred alternative:** Based on the comparative analysis, identify the alternative that best balances the project's purpose and need with environmental protection and social considerations.
- **Justification for the preferred alternative:** Clearly explain the rationale for selecting the preferred alternative, including the reasons for rejecting other options.

Additional Considerations:

- **Public involvement:** Seek input from the public and stakeholders throughout the alternatives analysis process.
- **Cumulative impacts:** Consider the potential cumulative impacts of the project and its alternatives, along with other past, present, and future actions in the area.
- **Legal and regulatory requirements:** Ensure that the alternatives analysis complies with all applicable laws and regulations.

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[i] ARM 36.17.610 CRITERIA FOR RANKING GOVERNMENTAL AND TRIBAL RENEWABLE RESOURCE GRANT APPLICATIONS (e) If a project is determined to have adverse environmental impacts that cannot be mitigated and do not preserve the state's renewable resources per 85-1-601, MCA, it is ineligible for a grant.

(f) No points may be awarded for technical feasibility. Points will be deducted for errors or omissions in this section. If a project is determined to not be technically feasible, it is ineligible for a grant. Technical feasibility includes, but is not limited to:

(i) adequacy of the alternative analysis;
(ii) adequacy of cost estimates for potential alternatives and the preferred alternative;
(iii) preferred alternative selection;
(iv) thoroughness and feasibility of the project's implementation plan and schedules; and
(v) quality of supporting technical data submitted with the application.

[ii] MCA 90-2-1112. Reclamation and Development Grants Program Eligibility requirements. (3) To be eligible for funding under the reclamation and development grants program, a project must:

(a) be technically and financially feasible;
(b) be the best cost-effective alternative to address a problem or attain an objective;
(c) comply with statutory and regulatory standards protecting environmental quality