SCOPING STATEMENTS & ENVIRONMENTAL ASSESSMENTS

GEMS Environmental Compliance-ESDM Training Series

Jordan ▪ March 2018
Learning Objectives

1. Appreciate the utility and goals of the scoping process
2. Know the contents of a USAID Environmental Assessment (EA)
3. Understand the logic and process of alternatives analysis
WHEN IS A FULL EA NEEDED?

1. When the IEE documents likelihood of significant environmental impacts (Positive Threshold Decision)

2. During program or activity design (e.g., project appraisal document [PAD] development) if/when high-risk activities are proposed (i.e., activity is designated as high-risk per 22CFR216.2(d))
TWO-STAGE PROCESS: EA STARTS WITH SCOPING

**Scoping**: determine the significant issues, alternatives, and data gaps that will be addressed in the EA

**Scoping Statement**:  
- Scope and significance of issues to be analyzed  
- Issues that do not need to be addressed  
- Schedule and format of the EA, expertise needed  
- Proposed methodology  
- Stakeholder engagement strategy
PURPOSE OF SCOPING

• Sets the stage for the EA
  – Ascertain/collect available data
  – Prioritize needs for additional information
  – Understand role of stakeholder consultations
  – Identify possible alternatives

• Helps identify potential issues and concerns related to the project that will need to be considered further in the EA
PURPOSE OF SCOPING (CONTINUED)

• Can help refine the proposed action
• Engage with project stakeholders
  – Solicit input
  – Keep informed on project’s progress
STAKEHOLDER ENGAGEMENT

• Goal: to communicate and inform in an inclusive manner and gather information from stakeholders
SCOPING DEFINES ISSUES

• An issue is derived from specific activities described under the Proposed Action
• Should be phrased as a cause-effect statement relating to actions under consideration
• An issue statement should describe a specific action (cause) and the potential environmental outcome(s) arising from that action (effect)
SCOPING ISSUE: EXAMPLE

A 20 km section of road is going to be repaired and rehabilitated and will require removal of vegetation along the sides of the road.

The road passes through a protected area, home to an endangered mammal; vegetation removal will impact its habitat.

Causative action: removing vegetation

Effect: removal of vegetation decreases habitat for the endangered mammal

Outcome: loss of habitat
SCOPING ELIMINATES ISSUES

• Any issues eliminated from further analysis should be documented in the Scoping Statement as “issues considered, but dismissed”
SCOPING STATEMENT CONTENT

• Brief description of the affected environment/baseline, existing conditions, purpose and need, and the specific proposed actions
• Identify significant issues related to the proposed action
• Document issues outside the scope of the proposed actions
• Timing for preparation of the EA
• Planning and decision-making schedule
• Description of how the analysis will be carried out
• Ideal composition of the EA team and/or area(s) of expertise needed to perform the assessment

BEO approves both the Scoping Statement and the EA
STAGE 2: PREPARATION OF THE EA

• Scoping Statement is completed and approved
• Terms of reference for EA are developed
• Technical expertise requirements are defined
• Budget is prepared
CONTENT OF THE EA

- Scope of the assessment
- Stakeholder engagement process
- Purpose and need of the proposed action
- Describe and evaluate the baseline situation
- Identify and analyze alternatives
- Identify and characterize potential impacts of the proposed activity
- Develop a mitigation and monitoring plan
- Communicate and document the evaluation process
THE EA INCLUDES ALTERNATIVES ANALYSIS

- **Summary**
- **Purpose**
- **Comparison of alternatives**
- **Affected Environment**
- **Environmental Consequences**
- **List of Preparers**

**Present the alternatives considered**
- Includes the no action alternative
- Explain why certain alternatives were not considered

**Compare the environmental impacts of these alternatives**
- Summary of the analysis presented in “environmental consequences”
- Include mitigation actions

**Identify the preferred alternative**
DEFINING ALTERNATIVES

• For any action, there are usually a very large number of alternatives
• Guidance states that a reasonable number of options must be evaluated that represent the full spectrum of the range of alternatives
• Alternatives must be viable
ALTERNATIVES ANALYSIS

1. Identify the reasonable alternatives to be evaluated, including the “No Action” alternative, that fulfill the Purpose and Need.

2. Present commensurate impacts in comparative form, clearly defining issues.

3. Examine alternatives based on technologies, project location, size, etc.

4. Explain why some alternatives were eliminated from consideration.

5. Identify the preferred alternative and justify the recommendation.
Alternatives are:

Means of accomplishing the project goal in such a way that the effects can be meaningfully evaluated.

Why Alternatives Analysis:

1. To respond to potential issues identified in the scoping process
2. Inform decision-makers of options to achieve similar goals

Alternatives analysis is the heart of the environmental assessment process. It addresses issues and explores options for fulfilling the purpose and need while evaluating for potential impact.
The actions associated with any given alternative may or may not be the same as those in the original project plan. Therefore, the connected actions of each alternative must be explored.

Actions are connected if they:

1. Automatically trigger other actions which may require environmental impact statements

and/or

2. Cannot or will not proceed unless other actions are taken previously or simultaneously

and/or

3. Are interdependent parts of a larger action and depend on the larger action for their justification
ALTERNATIVES ANALYSIS PROCESS

Identify a reasonable range of viable alternatives to be evaluated, including the “No Action” alternative.

Present the impacts in comparative, commensurate form, clearly defining issues.

Examine alternatives based on technologies, project location, size, etc.

Explain why some alternatives were eliminated from consideration.

Identify the preferred alternative.

Justify the recommendation.
Identify a reasonable range of viable alternatives to be evaluated, including the “No Action” alternative

Present the impacts in comparative, commensurate form, clearly defining issues

Examine alternatives based on technologies, project location, size, etc.

Explain why some alternatives were eliminated from consideration

Identify the preferred alternative

Justify the recommendation

Viable alternatives:
- Respond to the Purpose & Need
- Must not be substantially similar in design and effects to an alternative that is already analyzed
- Must not have remote or speculative implementation
- Must be economically & technically feasible
- Must be consistent with the basic objectives for management of the area (conformance with land use plans, country objectives, etc.)
NO ACTION ALTERNATIVE

• Two interpretations of the No Action Alternative:

1. Proposed action does not occur and existing conditions continue as-is
2. The current management scheme continues as-is

• Provides the baseline condition to compare effects
• Consider as a viable alternative that is evaluated equally with the other alternatives
• Required per 22 CFR 216 and Council on Environmental Quality regulations
ELIMINATION OF ALTERNATIVES

• The EA should briefly explain if any alternatives were considered, but dismissed
**ALTERNATIVES ANALYSIS: ELIMINATING ALTERNATIVES**

- **Identify** a reasonable range of viable alternatives to be evaluated, *including the “No Action” alternative*.
- **Present** the impacts in comparative, commensurate form, clearly defining issues.
- **Examine** alternatives based on technologies, project location, size, etc.
- **Explain** why some alternatives were eliminated from consideration.
- **Identify** the preferred alternative.
- **Justify** the recommendation.

Elimination of alternatives may use the following criteria:

- **Ineffective** (would not respond to purpose & need)
- **Technically or economically infeasible**
- **Inconsistent** with basic policy objectives of the area
- **Implementation** is remote or speculative
- **Substantially similar in design** to other alternatives
- **Substantially similar in effects** to other alternatives
The large majority of USAID host countries now have in place EIA policies and procedures.

Most projects that require an EA under Reg. 216 will also require a full EA under host-country procedures.

Collaboration with local Governments can facilitate the environmental analysis process for the Implementing Partners and USAID staff.
TYPES OF USAID ENVIRONMENTAL ASSESSMENTS

**ENVIRONMENTAL ASSESSMENT**
Used to assess the environmental effects of a specific project or action

**EXAMPLE**
An EA to evaluate a single irrigation or health clinic project

**PROGRAMMATIC ENVIRONMENTAL ASSESSMENT**
Used to assess the environmental effects of a class of similar actions

**EXAMPLE**
A PEA to evaluate construction of multiple schools or sustainable forest management plans

**RAPID ENVIRONMENTAL ASSESSMENT**
Used to assess, define and prioritize the potential environmental impacts in disaster situations

**EXAMPLE**
Earthquakes, floods, tsunamis, landslides