

Session 9.

Scoping Statements and Environmental Assessments

Technical presentation and dialogue

Summary

This session addresses the preparation of more detailed environmental review documentation: Scoping Statements and Environmental Assessments (EAs). These documents are typically prepared for activities that receive a Positive Threshold Decision in the IEE, or for which detailed environmental analysis is considered necessary from the outset based on the very nature of the proposed actions. This session will discuss the level of analysis that is required for Scoping Statements and EAs, and how that differs from the IEE, including analysis of alternatives. It will also review the timing and procedures for preparing Scoping Statements and EAs and illustrate how this fits within the Agency's mandatory pre-implementation review process. Related documents such as Programmatic Environmental Assessments (PEAs) will also be explained.

Reg. 216 defines an EA as “a detailed study of the reasonably foreseeable significant effects, both beneficial and adverse, of a proposed action on the environment.” An EA is required when a Positive Threshold Decision—the conclusion that significant environmental impacts are likely—is documented in the IEE. The purpose of the EA is to provide a thorough understanding of the proposed activity's likely impacts, necessary mitigation measures, and possible program or project alternatives during design and planning. This detailed analysis allows the Agency to make any needed adjustments or accommodations in activity design and allocate the resources needed to ensure environmentally sound implementation.

An EA may also be required for activities that USAID considers inherently high risk. Such activities are defined in Reg. 216 as “classes of actions normally having a significant effect on the environment” and include drainage projects, new lands development, resettlement efforts, power plants, and medium- or large-scale WASH; there are 11 categories of so-called high-risk activities for which preparation of an EA can be assumed. However, an EA may ultimately not be required for activities categorized as high risk. It is possible that a strong IEE may document an analysis and establish robust conditions for mitigation and monitoring that are considered sufficient through the document review and approval process to ensure environmentally sound implementation. In this regard, it is often preferable for the documentation process to start with the IEE, even for activities that might otherwise suggest an EA.

More frequently, it is the scoping process that will determine the content and preparation of an EA. Scoping is defined in Reg. 216 as the “process of identifying the significant issues relating to the proposed action and of determining the scope of the issues to be addressed in the Environmental Assessment.” This analysis is documented in a Scoping Statement. As a formal Reg. 216 document the Scoping Statement must be reviewed and approved before undertaking the EA. The Scoping Statement helps USAID prioritize the issues or potential impacts for further analysis and frames the timing, staffing and budget for preparation of the EA. Scoping is the first step in a necessarily two-stage assessment process, and preparation of the Scoping Statement should not be viewed simply as a *pro forma* precursor to the EA.

This session will explain when and how to conduct the scoping process and how it informs preparation of the EA. This session will also address alternatives analysis, which is required in the EA

(though not the IEE), and identifies options for meeting Agency programming goals with potentially fewer environmental impacts.

Alternatives analysis is a key component of the EA process through which issues are addressed and various options for fulfilling the purpose and need are evaluated for potential impact. 22 CFR 216.6(c)(3) states that the Alternatives Analysis:

“should present the environmental impacts of the proposal and its alternatives in comparative form, thereby sharpening the issues and providing a clear basis for choice among options by the decision-maker. This section should explore and evaluate reasonable alternatives and briefly discuss the reasons for eliminating those alternatives which were not included in the detailed study; devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits; include the alternative of no action; identify the Agency's preferred alternative or alternatives, if one or more exists; include appropriate mitigation measures not already included in the proposed action or alternatives.”

This session will explain the role of alternatives analysis within an Environmental Assessment, as well as key steps in preparing one.

Objectives

- Understand when an EA is required and review the types of EAs used by USAID.
- Establish the purpose, importance and timing of scoping within the EA process.
- Identify the content of a Scoping Statement and how it differs from, and yet supports the development of, the Environmental Assessment.
- Understand expected results from the Scoping process, and how these are used.
- Understand the role of Alternatives Analysis in the EA process.
- Understand how to develop an Alternatives Analysis, including:
 - How to identify and develop alternatives to the Proposed Action
 - How to describe alternatives
 - How to compare the alternatives