

EIS Scoping—Issues and Alternatives

by Thomas F. Slater

The word "scoping" has become common in recent years as it is applied to the planning and environmental impact statement (EIS) processes. The word may be familiar, but I will take a few minutes to amplify the scoping process. It is not a new concept since scoping merely represents the idea that we must "think together before we act." Scoping responds to the need to give coordinated, early direction to the EIS process. The goals are to obtain early public comments, avoid excessive paperwork, prevent statements from becoming huge encyclopedic reports, reduce the writing time, and provide real utility for decision-making.

Scoping, as a formal EIS requirement, was first set forth in 1978 in the Council on Environmental Quality (CEQ) regulations. Prior to that time there was no formal provision for advance public input to the EIS process and the trend was for bigger and bigger EIS documents which appeared to be more attuned to "weight and volume" than to content. It used to be that unless an EIS weighed about 13 pounds in a stack of paper 10 inches high it was not considered acceptable by some people. If done thoroughly, scoping can help avoid the "weight and volume" approach and can result in an EIS process with improved usefulness.

In a nutshell, scoping is intended to help us identify the big issues and real alternatives in a hurry. Scoping can help foster the coordinated management technique of "no surprises."

Scoping includes three major elements. These are:

- (1) Early announcement of proposed actions and opportunity for early response from officials, agencies, and the public;
- (2) Early determination of interests and issues, including environmental resources covered by specific laws and local/regional matters of public concern; and

- (3) Identification of a wide range of alternatives which are screened to determine a set of "reasonable alternatives" for detailed analysis in the EIS. Each EIS team develops a systematic screening process to fit the proposal which is being evaluated. For example, for the Allen-Warner Valley project, the team developed a detailed screening matrix to evaluate 46 alternatives suggested during scoping procedures.

It is important to note that this scoping process must be carried out in an open, objective manner and that before it can be effective, the applicant's proposed action must be well thought out and clearly defined.

Early Announcement and Public Response

The National Environmental Policy Act is a public disclosure law. Early public feedback on proposals, issues, and alternatives helps fulfill the intent of the law, and this helps the land management agencies to concentrate their efforts on those items of greatest public concern.

One of the first things that the land management agencies do after receiving an application for a major project right-of-way is to contact other involved agencies and announce public scoping meetings. The CEQ regulations call for emphasizing interagency cooperation before each EIS is prepared.

One goal of early public response is to obtain initial comments which can be used to shape the EIS analysis and thereby reduce adversary comments on a completed document. Sometimes this is successful and sometimes not; but the concept of early identification of problems (adversary comments) is worthwhile in the EIS expediting effort.

Early Determination of Issues

The CEQ regulations state that "Most important, NEPA documents must concen-

trate on the issues that are truly significant to the action in question, rather than amassing needless detail." The real focus of the scoping effort is to obtain some degree of consensus on the expected content of the EIS before it is written. This means reaching as much agreement as possible on what should be included and also on what should be omitted.

It is true that the early scoping of issues may not be one hundred percent effective, due to changes in people and/or events during the EIS preparation period; however, it has been working effectively enough to establish a new trend of relatively small and useful documents. Small documents do not mean that the necessary supporting study of the issues is any less, but the extraneous items and paper production are reduced. The EIS is not the end product for its own sake.

For most proposed projects, the applicants and the land management agencies usually have a good idea of some major issues. We usually share these with the public as a starting point for scoping meeting discussions. We ask the public to comment on, expand, or delete the issues we have listed, as well as add any new issues that are important. Public scoping meetings have varied degrees of success, depending on the amount of advance project publicity and the potential for controversy. It is important that Federal, State, and local agencies also contribute scoping input at this time. After the meetings, the EIS team will analyze the scoping comments and, based on the nature and number of the comments, make a determination on the level of detail needed for suitable EIS coverage.

It should be recognized that the scoping process will not satisfy every individual involved since issues and alternatives incorporated in the EIS will be based on the views of the collective majority of those involved in scoping. For example, if one person at a scoping meeting says that