

## NEPA Analysis Process: Exercise 5 Solution

C. Humphrey: Okay. By now you should have come up with two sets of potential alternatives for the two Purpose and Needs for Exercise 5.

The first Purpose and Need is the purpose and need for BLM action, which is to provide energy to the west coast. Look at what you came up with and let's see what our instructors came up with. What kind of alternatives would meet that Purpose and Need?

R. Hardt: Well, Cathy, you could build a series of nuclear power plants in California.

C. Humphrey: That would work.

M. Conry: Or you could develop wind farms.

J. Pollet: Or you could pipe oil from Canada back to California.

M. Conry: Or you could develop ports for supertankers to bring in natural gas all up and down the Pacific coast.

C. Humphrey: All of these alternatives would meet that Purpose and Need.

R. Hardt: And undoubtedly a whole lot of other alternatives as well. I think obviously we can see this would not make a good Purpose and Need for BLM. It would not present anything that would help us make a decision, something that BLM could make a decision about.

Let's talk a little bit about that second example. Much more detailed Purpose and Need statement. I won't read the whole thing, but the purpose for action is "Provide access for natural gas pipe transmission pipeline in Wyoming to Southern California."

So there we could see an alternative A, which would be, say, a 24-inch diameter pipeline from Pinedale, Wyoming to Riverside, California, along a certain route called route X.

Alternative B, a 20-inch pipeline from Pinedale, Wyoming, to Riverside along route Y.

Alternative C, an 18-inch diameter from Pinedale to Los Angeles along route Z.

We can see we can set up different routes, perhaps different size pipelines, perhaps some different design features about the pipeline, but it lends itself to a much more narrow range of alternatives, which can lead us to alternatives BLM can actually adopt that can facilitate BLM decision making.

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C. Humphrey: Now, that seemed fairly straightforward, developing that range of alternatives for those two Purpose and Needs. As we all know, in reality, it's not that easy to develop alternatives.

Richard, you've told me that you kind of like developing alternatives. You don't think it's too tough. So give us some tips. What have you found that helps?

R. Hardt: Well, I think it's often not all that hard if we're able to really brainstorm freely. We do know the resources. We do know the land. We should be able to come up with alternative ways of meeting a Purpose and Need. It's important, though, when we're brainstorming within the ID team, for example, that we don't allow ourselves to be limited, that we don't allow ourselves to be limited by things like "That's not the way we do things," or "We've never done that way," or "The manager would never choose that," or "The applicant wouldn't like that," or even something like, "It would be more expensive." That's not a reason to exclude something from being reasonable. Or "The applicant doesn't have the equipment to do that," or "They don't know how to do that." Those aren't reasons to exclude something from being reasonable.

CEQ guidance tells us that in determining the scope of alternative to be considered, the emphasis is on what is reasonable rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative.

So in addition to looking at different ways to meet the Purpose and Need, look at the issues you've identified. Think about whether different alternatives would result in different effects relative to the identified issues. That can be a good way of generating an idea for an alternative that hasn't been explored.

Finally, of course, scoping is often a very good source of alternatives, as we've already touched on. As we said before, sometimes the alternatives proposed by the public can come to us in a rough or an incomplete form, but if the concept is responsive to the Purpose and Need, don't be afraid to develop it within the ID team into a fully developed reasonable alternative that can be analyzed.