PN-ACT-383

USAID

UNITED STATES AGENCY

FOR

INTERNATIONAL DEVELOPMENT

INTRODUCTION TO USAID ENVIRONMENTAL PROCEDURES

PREPARED BY

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A

TABLE OF CONTENTS

Course Description.....Chapter 1

History:.....Chapter 2

Presentation: Power Point Slides..... Chapter 3

Review Questions..... Chapter 4

Website Resources.....Chapter 5

FAA Sections 117, 118 and 119..... Chapter 6

22 CFR 216: Agency Environmental Procedures (Purpose, policy, Definitions, Applicability of Procedures and Procedures) .....Chapter 7

ADS 201: Planning.....Chapter 8

ADS Chapter 204: Environmental Procedures..... Chapter 9

Flow Charts..... Chapter 10

IEE Format/ Template..... ..... Chapter 11

Sample IEE Documents..... .....Chapter 12

1. Categorical Exclusion-Russia, Project 110-0005 under SO 1.3 and SO 1.4
2. Categorical Exclusion (CE) & Negative Determination (ND)-Russia, SOs 2.1, 2.2, 4.1/ 4.2
3. Medical Assistance-NIS Regional for Carelift Int'l, SO 3.2
4. Health-Seven Activities of Project 118-032 under SO 3.2a
5. Macedonia-EAPS Project
6. FOREST Project-Russia (CE, ND with conditions and Umbrella IEE)
7. Infrastructure
8. Regional Water-South Caucasus (Armenia, Azerbaijan and Georgia)
9. SO 1.6-Improved Management of Critical Natural Resources including Energy for 5 CAR countries
10. Energy-Serbia, 169-0005
11. Ecolinks Grants Program- An Umbrella IEE with requirement on Environmental Review Procedures

Selected Guidelines/ References..... .....Chapter 13

1. Judge John. J. Sirica's Letter & Civil Action 75-0500, Environmental Defense Fund Vs USAID
2. Executive Order 12114-Enviornmental Effects Abroad of Major Federal Actions
3. E/mail on grant to UNDP-typical examples of significant impacts
4. Pesticides

B

TABLE OF CONTENTS (Cont'd)

Selected Guidelines/ References...(Cont'd)..... .....Chapter 13

5. For Multisectoral Guidelines and Pesticides that are restricted, cancelled or Suspended by USEPA (Consult Technical Paper No 18 (Environmental Guidelines for Small-Scale Activities in Africa), Appendix E-2, p. 184-This document may be downloaded from http://www.usaid.gov/sdpsge/pubs/18ngo.pdf)
6. Wetlands
7. Safe management of waste from health-care activities
8. PEA, Moldova-Outline
9. Environmental Monitoring during construction of Brcko Railway Bridge-Bosnia-Herzegovina
10. Environmental Assessment Checklist for Olovo Health Center-Bosnia-Herzegovina
11. Environmental Baseline Survey on Pre-construction and Post-construction conditions at Grbavica School, Bosnia-Herzegovina
12. Mitigation-Macedonia, Stanica Zelenikovo Sewer System Project under EAPS

Course Description-General Outline

Course Title: Introduction to USAID Environmental Procedures (Approximate Time: 4.0 hours)

1.0 OBJECTIVE

The objective of the course is to introduce the Mission Environmental Officers (MEOs), other USAID Field Mission/ WDC Office officials, Strategic Objective (SO) Team Members, . and Implementing Partners (Contractors, Grantees, NGOs, PVOs, etc.) in compliance procedures for 22 CFR 216-USAID Environmental Procedures.

2.0 MATERIALS

2.1 Participant:

USAID Environmental Compliance Training Handbook

2.2 Instructor:

Power Point presentation equipment (computer, projector, power, etc.)
Back up: Option - Overheads/projector
Backup: Option - Hard copies
USAID Environmental Compliance Training Handbook

3.0 INTRODUCTION

Welcome
Presentations-briefly explain the Power Point slides
Review Questions
Field trip (Optional)

4.0 CLASSROOM/LECTURE PRESENTATION

4.1 Background, References and Introduction:

Background

- Why USAID should comply (Give brief history of Reg. 216)?
- Purpose - 22 CFR 216.1 (a)
- USAID Environmental Policy- 22 CFR 216.1 (b) (1) to (4), have participants/s read (1) through (4)

References

- **FAA Section 117** (Environment and Natural Resources)
- **FAA Section 118** (Tropical Forests)
- **FAA Section 119** (Endangered Species-Biodiversity)

22 CRR 216 : Agency Environmental Procedures can be found in several documents including:

- USAID Environmental Compliance Training Handbook
- Technical Paper No 18 (Environmental Guidelines for Small-Scale Activities in Africa), Appendix E-2, p. 184-This document may be downloaded from http://www.usaid.gov/sdpsge/pubs/18ngo.pdf

- Environmental Documentation Manual (EDM), Appendix D-1. This document may be downloaded from http://www.foodaid.org/usaiddoc.htm
- USAID External Web page under environment (www.usaid.gov)
- E&E Bureau web page (www.ee-environment.net/216)

USAID Automated Directives System (ADS) Chapter 201: USAID Program Assistance-Planning

- USAID Environmental Compliance Training Handbook
- USAID Intranet Homepage (www.inside.usaid.gov)
- USAID External Web page under environment (www.usaid.gov)

USAID Automated Directives System (ADS) Chapter 204: USAID Program Assistance-Environmental Procedures

- USAID Environmental Compliance Training Handbook
- USAID Intranet Homepage (www.inside.usaid.gov)
- USAID External Web page under environment (www.usaid.gov)
- Technical Paper No 18 (Environmental Guidelines for Small-Scale Activities in Africa), Appendix E-1, p. 179-This document may be downloaded from http://www.usaid.gov/sdpsge/pubs/18ngo.pdf

Introduction

- USAID Environmental Compliance Training Handbook
- Discuss Decision Tree for Reg. 216
- EBRD- Environmental Procedures-Environmental Screening
- Environmental Assessment checklist
- Use overhead or PPT, give brief overview of relationship of compliance documents and discuss briefly ADS 201, ADS 204 and 22 CFR 216

4.2 Review Questions: Correct and Discuss (All trainees will participate)

4.3 Review of USAID Environmental Procedures

Definitions [22 CFR 216.1 (c)]

Initial Environmental Examination
Environment
Significant Effect
Threshold Decision
Exemptions [22 CFR 216.2 (b)(1)]
Categorical Exclusions (CE) **[22 CFR 216.2 (c)(2)]**
Relationship of CE to *22CFR 216.3 Procedures*
Environmental Assessment (EA) **[22 CFR 216.6]**
and classes of actions w/ significant effect: **[22 CFR 216.2 (d)]**
Environmental Impact Statement (EIS) **[22 CRR 216.7]**
Minor Donor [22 CFR 216.1 (c) (12)]

Applicability Of Procedures [22 CFR 216.2]

Scope [22 CFR 216.2 (a)]
Exemptions [22 CFR 216.2 (b)(1)]
Categorical Exclusions **[22 CFR 216.2 (c)(1)]**
Negative Determination **[22 CFR 216.3 (a)(2)]**, (p. 128-129/ T.P. No. 18), Environmental Screening form (p. 131/ T.P. No. 18), and EDM 2-3
Positive Determination **[22 CFR 216.3 (a)(2)]**
Negative Declaration **[22 CFR 216.3 (a)(3)]**
Classes of Actions Normally Having a Significant Effect on the Environment *[22 CFR 216.2 (d)]*
Programmatic Environmental Assessment (PEA)**[22 CFR 216.6 (d)]**, T.P. No. 18 (p. 105-106), EDM (C-1)
Deferral **[22 CFR 216.3 (a)(1)(iii)]**, T.P. No. 18 (p. 106, p.189-190), EDM (2-4)
Monitoring Plan [22 CFR 216.3 (a)(8)] and Mitigation Plan (EDM 4-20)

Procedures [22 CFR216.3]

Preparation of Categorical Exclusion [Tab 1,EDM (A-1)]
Preparation of the Initial Environmental Examination (IEE)
For activities that cannot be explained in sufficient detail
Explanation
Estimate of time
Recommendation of deferral
Threshold Decision
Positive Threshold Decision
Negative Threshold Decision

4.4 Format

Environmental Compliance Facesheet/Narrative-Request for a Categorical Exclusion
IEE Facesheet and IEE Narrative

4.5 Sample IEE Documents

1. Categorical Exclusion-Russia, Project 110-0005 under SO 1.3 and SO 1.4
2. Categorical Exclusion (CE) & Negative Determination (ND)-Russia, SOs 2.1, 2.2, 4.1/ 4.2
3. Medical Assistance-NIS Regional for Carelift Int'l , SO 3.2
4. Health-Seven Activities of Project 118-032 under SO 3.2a
5. Macedonia-EAPS Project
6. FOREST Project-Russia (CE, ND with conditions and Umbrella IEE)
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8. Regional Water-South Caucasus (Armenia, Azerbaijan and Georgia)
9. SO 1.6-Improved Management of Critical Natural Resources including Energy for 5 CAR countries
10. Energy-Serbia, 169-0005
11. Ecolinks Grants Program- An Umbrella IEE with requirement on Environmental Review Procedures

4.6 Selected Guidelines/ References

1. Judge John. J. Sirica's Letter & Civil Action 75-0500, Environmental Defense Fund Vs USAID
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3. E/mail on grant to UNDP-typical examples of significant impacts
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History

Due to public concern over environmental issues, the United States government passed the world's first comprehensive environmental legislation, the National Environmental Policy Act in 1970. This law set environmental standards for government-funded domestic activities. Though there was pressure to regulate international activities as well, no similar laws covered U.S.-funded international activities.

During this period, USAID made chemical inputs freely available to its agricultural development programs. In 1974 a USAID agricultural project in Pakistan supplied poorly trained field workers with highly concentrated Malathion. In the heat, five workers who were not wearing safety equipment sprayed each other with the toxic pesticide and died.

One result of this tragedy was a lawsuit brought against USAID by U.S. private voluntary organizations (PVOs) that accelerated the process of establishing environmental regulations for international development programs funded by USAID. In 1975 USAID was given a choice between developing environmental procedures or closing down.

In an out-of-court settlement approved by Judge John J. Sirica, USAID agreed to develop its own environmental procedures. These were refined and later made into law under the Foreign Assistance Act, Section 117. USAID's environmental procedures, or "Regulation 216" (Title 22, Code of Federal Regulations, Part 216, also known as "22 CFR 216") were the result. Today USAID views "environmental impact assessment as not just a legal requirement, but as one of the most essential and basic tools for designing sustainable activities" (Hester, USAID, personal communication).

USAID

E & E Bureau

EEST/ENR/WA

Course Title: Introduction to USAID Environmental Procedures

Course Objective

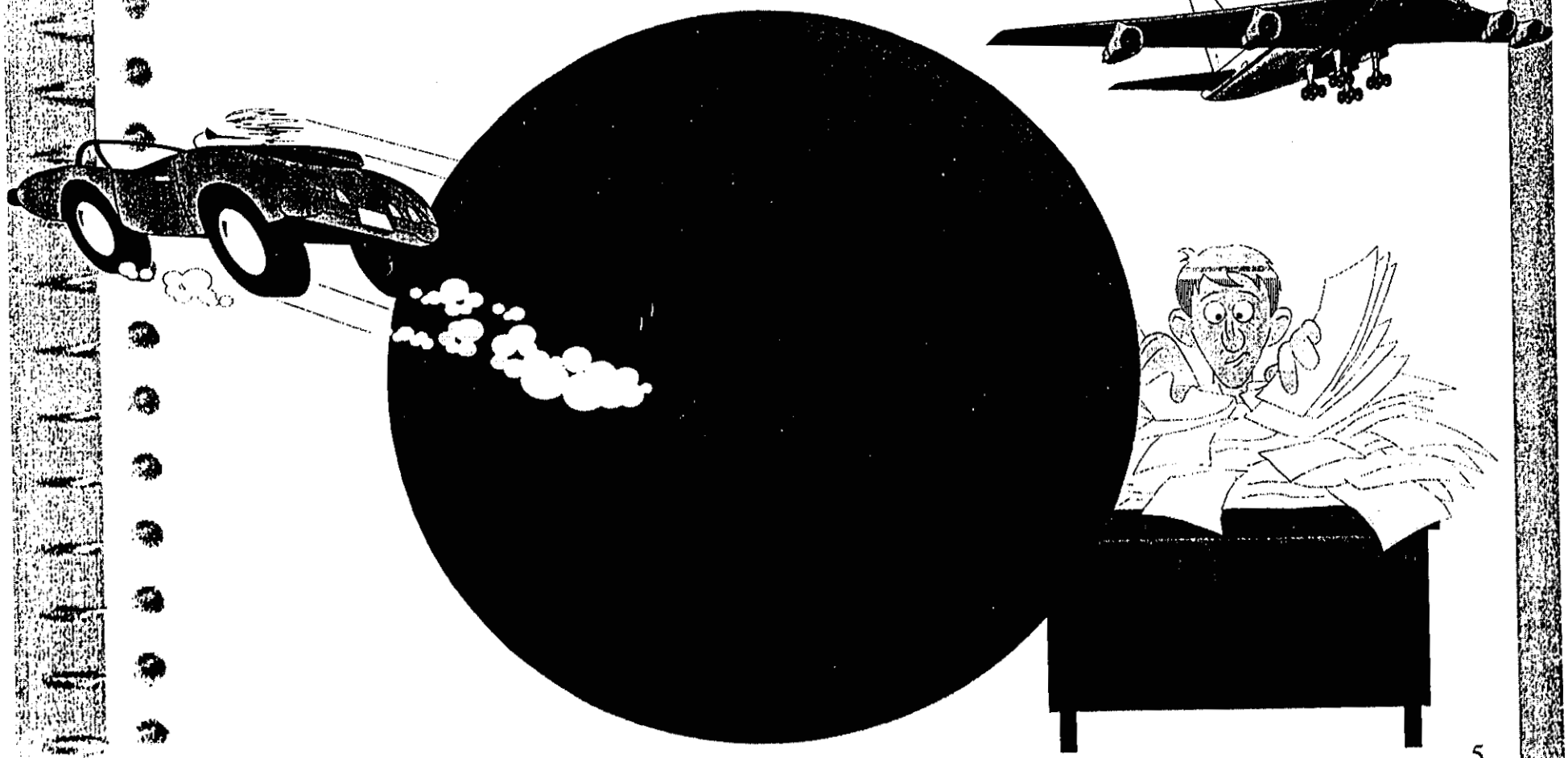
Introduce the basic rationale behind 22CFR 216 and its application.

Introduction

- ✓ Welcome/personal introductions
- ✓ Presentation: Power Point Slides
- ✓ Discuss Review Questions
- ✓ Review FAA-sections 117, 118, 119 & USAID Procedures (22 CFR 216)
- ✓ IEE format and IEE Samples
- ✓ Field trip/ Demonstration (optional)

Review Questions

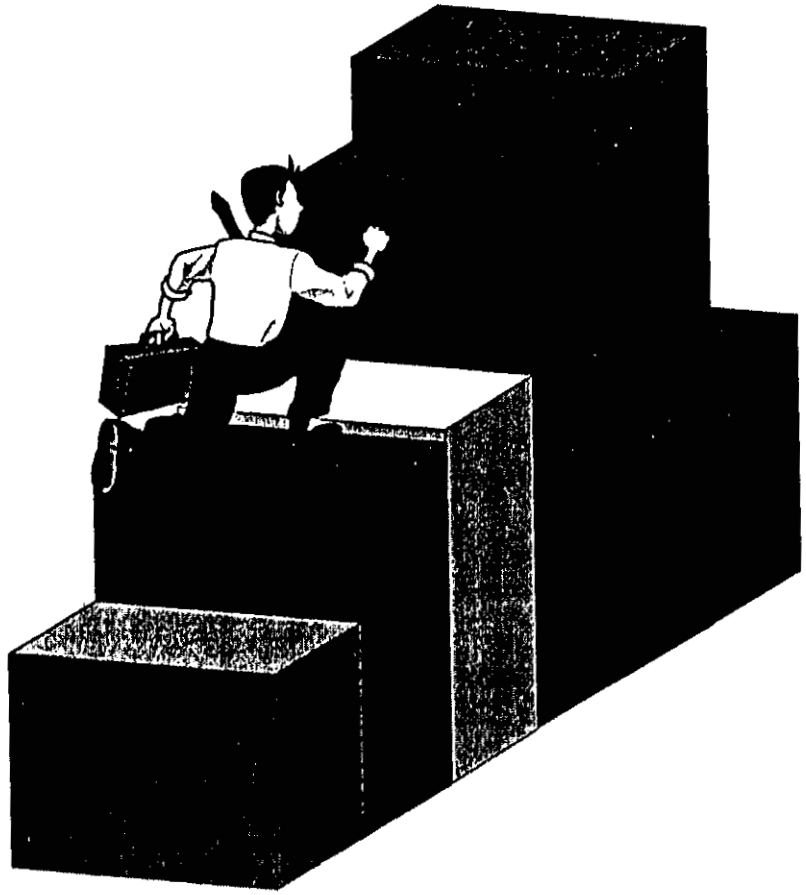
Where Have We Been?



Background- Why USAID should comply?

- ✓NEPA (1970) set environmental standards for domestic activities
- ✓ 1975 USAID to shut down or develop environmental procedures (law suit)
- ✓FAA section 117 amended/ E/O of Jan 1979 and 22 CFR 216 (October 1980),
- ✓Reg. 216-legal requirement and basic tool for designing sustainable activities

The Challenge



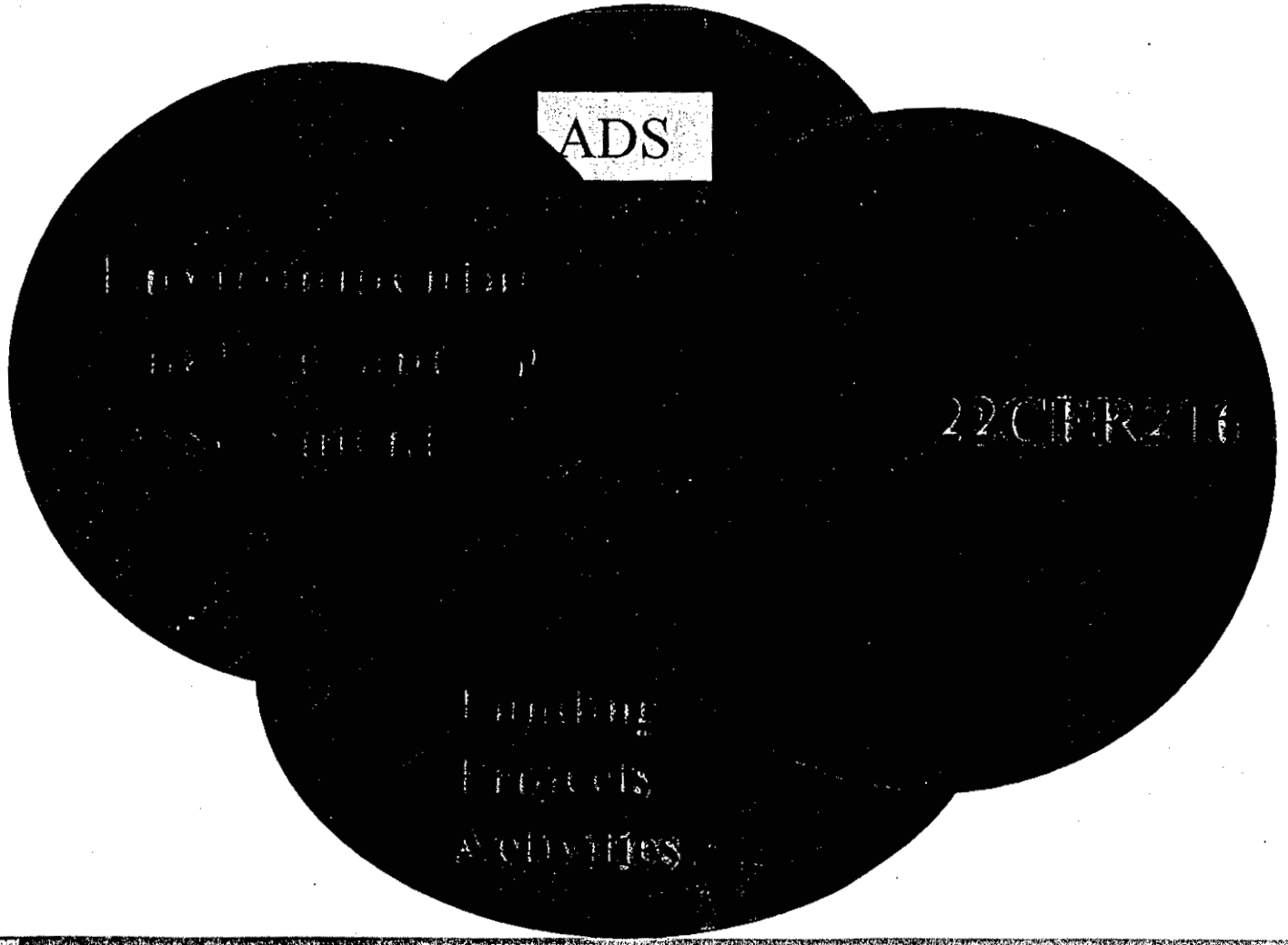
Adapt Environmental Compliance to the Real World

- ✓ Regulations to "Enable us" and not "Require us".
- ✓ Environmental compliance in concert with development and not against it
- ✓ Ability of people to live with "Mother Earth" with least risk to each.

Who is Affected?

- old-young
- ✓ male-female
- ✓ pastoralist
- ✓ urbanite
- ✓ butterflies
- ✓ sick-well
- ✓ rich-poor
- farmer
- ✓ people in the country
- ✓ elephants
- ✓ others

Intersection



FAA Sections

- ✓ **FAA Section 117** (Environment and Natural Resources)
- ✓ **FAA Section 118** (Tropical Forests)
- ✓ **FAA Section 119** (Endangered Species-Biodiversity)

15

How to Find *ADS 201 &204*

- ✓USAID Environmental Compliance Handbook
- ✓USAID External Web page (www.usaid.gov)
- ✓USAID Intranet (www.inside.usaid.gov)
- ✓Also find ADS Chapter 204 in

E&E Bureau web page (www.ee-environment.net/216) and Technical Paper No 18

(Environmental Guidelines for Small-Scale Activities in Africa), Appendix E-2, p. 184, See http://www.usaid.gov/sdpsge/pubs/18ngo.pdf

How to Find *22 CFR 216*

- ✓USAID Environmental Compliance Handbook
- ✓Technical Paper No 18 (Environmental Guidelines for Small-Scale Activities in Africa), Appendix E-2, p. 184, See http://www.usaid.gov/sdpsge/pubs/18ngo.pdf
- ✓Environmental Documentation Manual (EDM), Appendix D-1, see http://www.foodaid.org/usaiddoc.htm
- ✓USAID External Web page (www.usaid.gov)
- ✓E&E Bureau web page (www.ee-enviornment.net/216)

USAID Environmental Procedures

22 CFR 216

- ✓216. 1 Introduction,
- ✓216. 2 Applicability of procedures
- ✓216. 3 Procedures
- ✓216. 4 Private applicants
- ✓216. 5 Endangered species

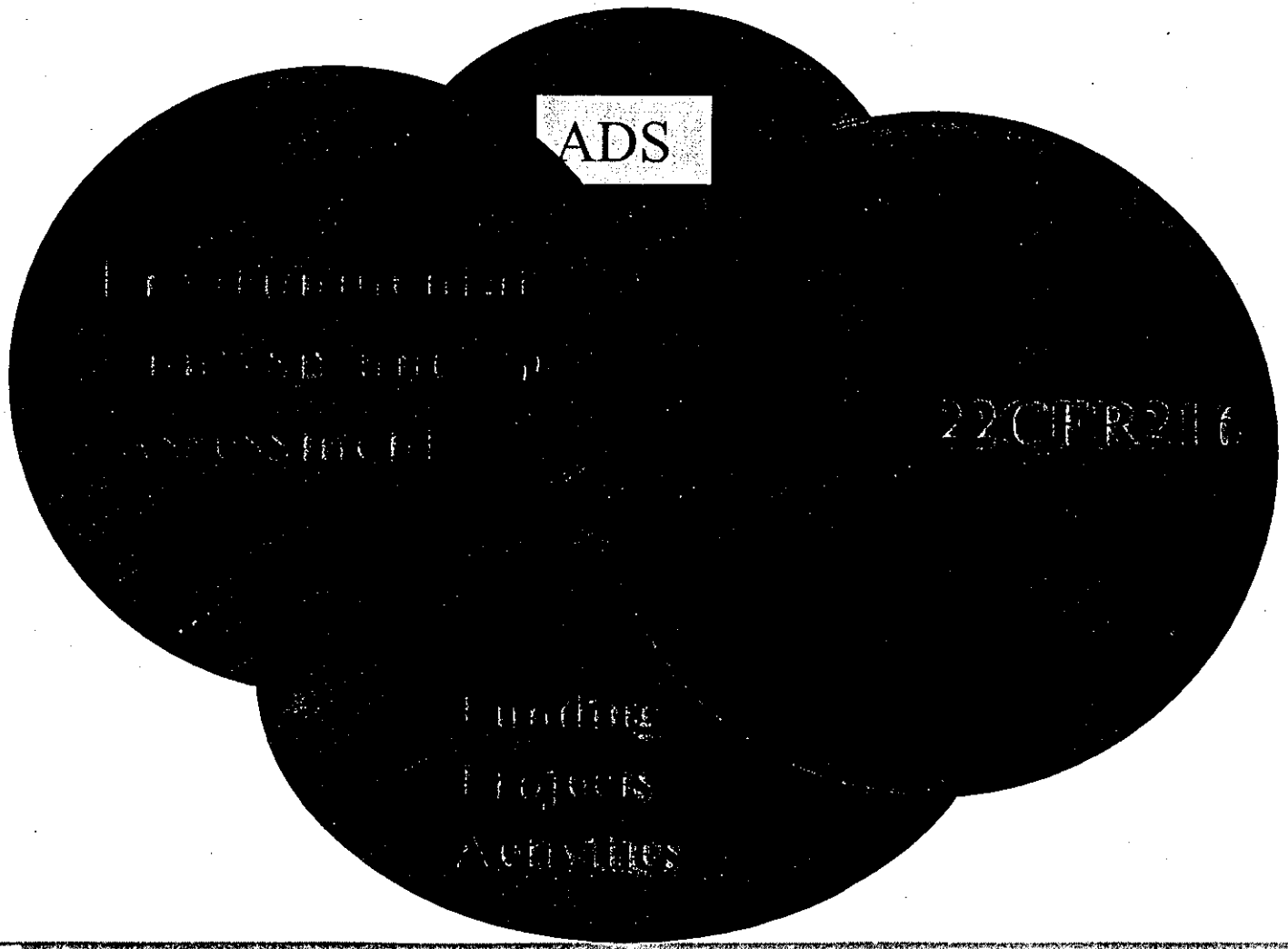
18

USAID Environmental Procedures

22 CFR 216

- ✓216. 6 Environmental assessments
- ✓216. 7 Environmental impact statements
- ✓216. 8 Public hearings
- ✓216. 9 Bilateral and multi-lateral studies and concise reviews of environmental issues
- ✓216.10 Records and reports

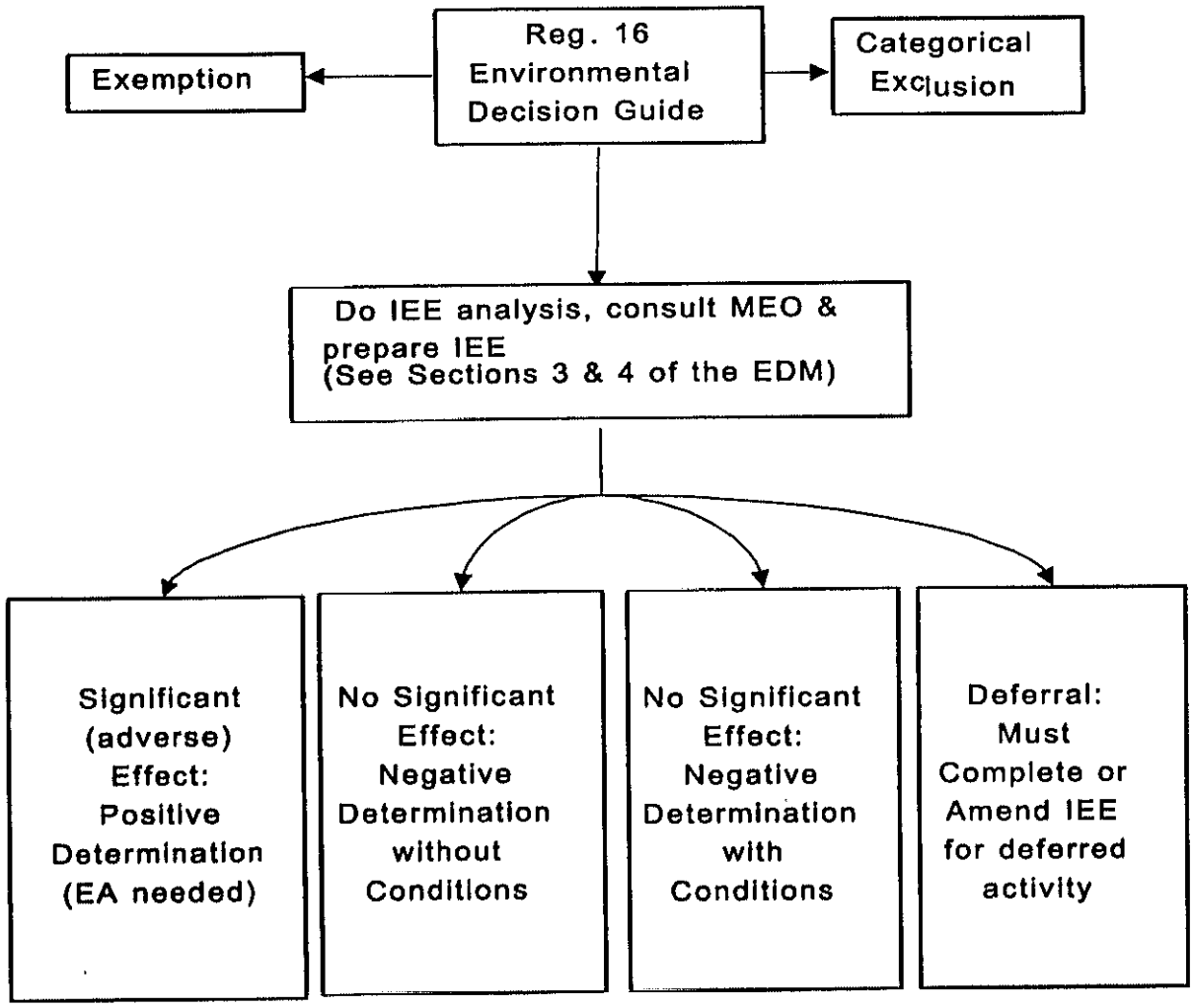
Intersection



20

Applicability of Procedures-Scope [22 CFR 216.2 (a)]-

Decision Tree for Reg 16



21

Introduction-*Purpose & Policy*

- ✓ **Purpose - 22 CFR 216.1 (a)**-ensure environmental factors integrated into AID decision making process and assigning responsibility for following AID procedures

- ✓ **Environmental Policy- 22 CFR 216.1 (b) (1) to (4)**, have student/s read (1) through (4)

Introduction-Definitions

[22 CFR 216.1 (c)]

- ✓ CEQ
- ✓ Initial Environmental Examination(IEE)
- ✓ Threshold Decision
- ✓ Environmental Assessment
- ✓ Environmental Impact Statement
- ✓ Environment
- ✓ Significant Effect
- ✓ Minor Donor

23

Applicability of Procedures

[22 CFR 216.2] & More

- ✓ Exemptions **[22 CFR 216.2 (b)(1)]**
- ✓ Categorical exclusions **[22 CFR 216.2 (c)(1]**
- ✓ Negative Determination **[22 CFR 216.3 (a)(2)]**
- ✓ Actions having a significant effect on the environment **[22 CFR 216.2 (d)]** & Positive Determination **[22 CFR 216.3 (a)(2)]**
- ✓ Environmental Assessment **[22 CFR 216.6]**
- ✓ Programmatic EA (PEA) **[22 CFR 216.6 (d)]** & EIS **[22 CRR 216.7]**
- ✓ Negative Declaration **[22 CFR 216.3 (a)(3)]**

Procedures [22 CFR 216.3]

- ✓ IEE Preparation **[22 CFR 216.3 (a)(1)(i)&(ii)]**
- ✓ Deferral **[22 CFR 216.3 (a)(1)(iii)]**
- ✓ Pesticides Procedures **[22 CFR 216.3 (b)]**
- ✓ Review after authorization of financing **[22 CFR 216.3 (a) (7)]**
- ✓ Monitoring plan **[22 CFR 216.3 (a)(8)]**
- ✓ Revisions **[22 CFR 216.3 (a)(9)]**

24a

ADMINISTRATIVE DIRECTIVE SYSTEM (ADS)

- ✓ **ADS 201 - Planning**
- ✓ Primary Responsibilities
- ✓ Policies and Procedures
- ✓ Mandatory References
- ✓ Definitions
- ✓ **ADS 204 - Environmental Procedures**
- ✓ 22 CFR 216
- ✓ Operational
- ✓ Strategic Objectives
- ✓ Authority levels

Compliance Document Format

- ✓ Categorical exclusion face sheet (environmental compliance face sheet)
- ✓ Request for a categorical exclusion -2 sections
- ✓ IEE face sheet
- ✓ IEE narrative-5 sections

Sample IEE Documents

- ✓ Categorical Exclusion-Russia, Project 110-0005 under SO 1.3 and SO 1.4
- ✓ Categorical Exclusion (CE) & Negative Determination (ND)-Russia,SOs 2.1, 2.2, 4.1/ 4.2
- ✓ Medical Assistance-NIS Regional for Carelift Int'l, SO 3.2
- ✓ Health-Seven Activities under SO 3.2a.
- ✓ Macedonia-EAPS Project

Sample IEE Documents

- ✓ FOREST Project-Russia (CE, ND with conditions and Umbrella IEE)
- ✓ Infrastructure-Kosovo
- ✓ Regional Water-South Caucasus (Armenia, Azerbaijan and Georgia)
- ✓ SO 1.6-Improved Management of Critical Natural Resources for 5 CAR countries
- ✓ Energy-Serbia, 169-0005
- ✓ Ecolinks Grants Program- An Umbrella IEE

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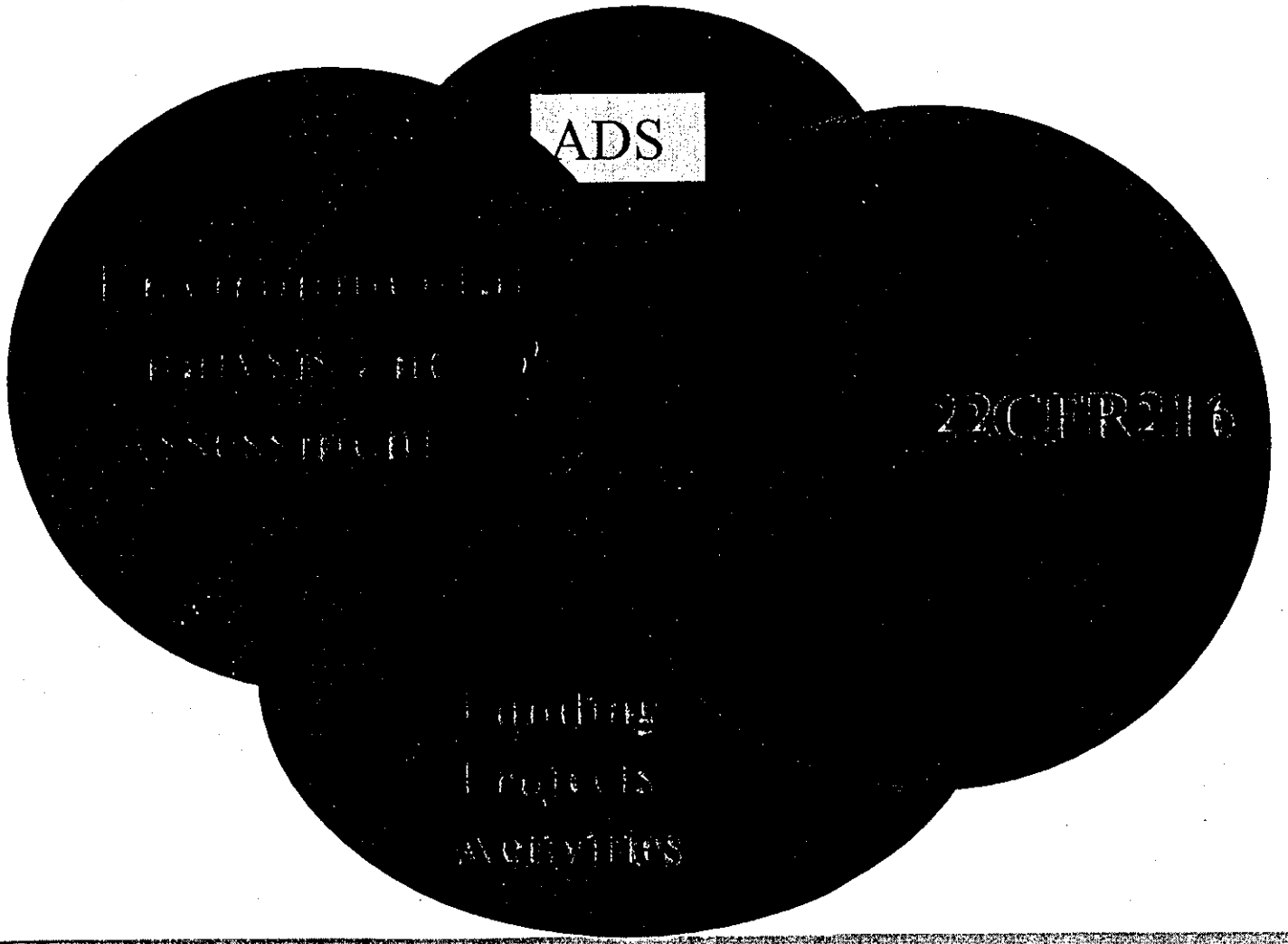
- ✓ E/mail on grant to UNDP-typical examples of significant impacts
- ✓ Pesticides
- ✓ Multisectoral Guidelines & Pesticides restricted, cancelled or Suspended by USEPA

Selected Guidelines/ References

- ✓ **Wetlands**
- ✓ **Safe management of waste-health-care**
- ✓ **PEA, Moldova-Outline**
- ✓ **Environmental Monitoring during onstruction of Brcko Railway Bridge-Bosnia-Herzegovina**
- ✓ **Environmental Assessment Checklist for Olovo Health Center-Bosnia-Herzegovina**
- ✓ **Environmental Baseline Survey on Pre-construction and Post-construction conditions/Grbavica School, B-H**
- ✓ **Mitigation-Macedonia-Sewer System**

Intersection



ENVIRONMENTAL COMPLIANCE TRAINING

REVIEW QUESTIONS

1. USAID's Environmental Procedures are Federal Regulations, and therefore represent a legal requirement as well as Agency policy. True _____False_____.

2. [§22 CFR 216] 22 indicates _____.CFR stands for_____.
   216 indicates _____.

3. IEE is an acronym for: _____.

4. An IEE is the first review of the reasonably foreseeable effects of a proposed action on the environment. Its function is to provide a brief statement of the factual basis for a _____ Decision as to whether an Environmental _____or an Environmental _____Statement will be required.

5. With respect to effects on the environment outside the United States, a proposed action has a _____effect on the environment if it does _____harm to the environment.

6. Minor Donor. For purposes of these procedures, A.I.D. is a minor donor to a multidonor project when A.I.D. does not control the planning or design of the multidonor project and either

   (i) A.I.D.'s total contribution to the project is both less than $ U.S._____and less than _____percent of the estimated project cost, or

   (ii) A.I.D.'s total contribution is more than $ U.S. _____but less than ____percent of the estimated project cost and the environmental procedures of the donor in control of the planning and design of the project are followed, but only if the A.I.D. Environmental_____determines that such procedures are adequate.

7. A Positive Threshold Decision shall result from the finding that the proposed action will have a significant effect on the environment.
   True ____. False _____.

8. The Threshold Decision can be made by the Mission Director for PVO projects without the concurrence of the Bureau Environmental Officer with a total life of project cost less than $ U.S.500,000. True ___. False ____.

9. Is International disaster assistance, which includes procurement or use of pesticides exempt from Reg. 16 requirements? Yes___. No____.

10. Does each country development strategy statement prepared by A.I.D. require an analysis of the actions necessary in that country to conserve biological diversity?
Yes___. No ____.

11. Who is responsible for allocating adequate staff and financial resources to implement the Agency's environmental procedures? (Pick one).
Operating Units_____.
SO Teams _____.
Mission Environmental Officer (MEO)_____.
Bureau Environmental Officer (BEO)_____.

12. Who is responsible for insuring full compliance with §22 CFR 216, the Agency's environmental procedures (Includes design, monitoring, and modifying all programs, results packages and activities)?
Operating Units_____.
SO Teams _____.
Mission Environmental Officer (MEO)_____.
Bureau Environmental Officer (BEO)_____.

13. Who is responsible for advising Mission SO teams on how to best to comply with §22 CFR 216, the Agency's environmental procedures?
Operating Units_____.
SO Teams _____.
Mission Environmental Officer (MEO)_____.
Bureau Environmental Officer (BEO)_____.
Mission Director (MD) _____.

14. Who is responsible for overseeing the effective implementation of §22 CFR 216 throughout all operating units in a bureau?
Operating Units_____.
SO Teams _____.
Mission Environmental Officer (MEO)_____.
Bureau Environmental Officer (BEO)_____.
The Assistant Administrator(AA) _____.
Agency Environmental Coordinator (AEC) _____.

15. Who is responsible for overseeing the effective implementation of §22 CFR 216 throughout the Agency?

Operating Units_____.
SO Teams _____.
Mission Environmental Officer (MEO)_____.
Bureau Environmental Officer (BEO)_____.
The Administrator _____.
Agency Environmental Coordinator (AEC) _____.

16. The use of any pesticides [§22 CFR 216.3 (b), Pesticide Procedures]
"Use" is interpreted broadly to include:
Check appropriate box/s that apply in the "Use" of pesticides.

- ☐ handling
- ☐ transport
- ☐ storage
- ☐ mixing
- ☐ loading
- ☐ application
- ☐ clean up of spray equipment, and
- ☐ disposal of pesticides, as well as the
- ☐ provision of fuel for transport of pesticides, and
- ☐ Providing technical assistance in pesticide management [this does not include Integrated Pest Management (IPM)].
- ☐ All the above

17. Categorical Exclusion applies to activities involving Support for intermediate credit institutions when the objective is to assist in the capitalization of the institution or part thereof and when such support does not involve reservation of the right to review and approve individual loans made by the institution: True ___. False ____.

18. If an activity fits under one or more of the 15 classes of actions under Categorical Exclusions (i.e. Education, technical assistance, or training programs), which of the following is required?

_____IEE
_____Request for Categorical Exclusion
_____Both

19. Will the procedures set forth in §216.3 (b)(l) apply to the projects including assistance for the procurement or use, or both, of pesticides under emergency conditions if a pest outbreak has occurred or is imminent? Yes ___. No____.

20. Is the record keeping on environmental compliance of activities funded by USAID legally required? Yes_____ No_____.

USAID/ENI CFR 216 Compliance Documents

CFR 216 Environmental Compliance Procedures

USAID Environmental Compliance Procedures

Annexes

A. Annex A: Categorical Exclusion and Initial Environmental Examination Forms
B. Annex B: Programmatic Environmental Assessments
C. Annex C: Examples of Categorical Exclusions and Initial Environmental Examinations (IEEs)
D. Annex D: Official USAID Guidance
E. Annex E: Sample Tables, Matrices and Environmental Checklists
F. Annex F: Preparation of an Umbrella IEE
G. Annex G: Environmental Review and Public Law 480

Template for R4/R2 Annex

Searchable Form of Completed 216 Documents

Click here to search the database.

Database administrators click here to update the database.

Questions? Contact Carl Maxwell, E&E/EEST/ENR.

Template for R4 Annex Reporting Requirement for Missions

In Fy 1997, three Initial Environmental Examinations (IEEs) and one full Environmental Assessment (EA) were completed for ABC Pilot activities (110-xxxx) and two IEEs were completed for the Star activities (110-xx1). Monitoring of these activities per the approved IEE was done by the contractor and /or the Mission. Records of monitoring are available at the Mission with the Mission Environmental Officer (MEO). Copies of these records were /or will be forwarded to the ENI Bureau Environmental Officer (BEO) for information, records and review. The Mission has also received categorical exclusions for the two Strategic Objectives (SOs) SO-x01/ SO-x02. The exclusions were granted because the activities undertaken in support of the SOs do not have adverse impact on the natural or physical environment. Should the Mission or the Bureau determine later during implementation process that certain activities have an adverse environmental impact, these subject IEEs will be revised accordingly, and an environmental evaluation and monitoring process will be also initiated.

In FY 1998, two EAs will be completed for the Slotus (110-xx3)and Tlotus (110-xx4) activities. Tlotus activities will require support from the ENI/ BEO in August 1998. Eight IEEs are planned for FY1998 and 1999- two under Star activity and five under Saturn activity, and one under Beta Initiative to be designed in FY 1998. No additional requirements are envisioned for the FY 1998-2000 period.

Now searching for the record in the Activity IEE database:

Your search was for:

Project Number:
Project Title:
IEE Date:
Determination:
Country or Activity Name: Ukraine
Remarks:

And the closest matches were:

Project Number	Project Title	IEE Date	Determination	Country or Region	Activity Name	Remarks
110-0002	Energy Efficiency and Market Reform	June-97	Catagorical Exclusion	Ukraine	Ukraine Land Resource Management Institute Infrastructure	
110-0002	Energy Efficiency and Market Reform	May-97	Negative/ Data collection recommended	Ukraine	Infrastructure and Energy Efficiency Project	
110-0002	Energy Efficiency and Market Reform	April-95	Catagorical Exclusion	Ukraine	ISAR Grants	
110-0002	Energy Efficiency and Market Reform	April-95	Catagorical Exclusion	Ukraine	International Public Participation in Environmental Law Workshop	
110-0002	Energy Efficiency and Market Reform	April-95	Catagorical Exclusion	Ukraine	Practical Eco-Knowledge to Farmers Now	
110-0004	NIS Special Initiatives	July-96	Negative	Ukraine	Humanitarian Health Assistance Activity; Program for Appropriate Technology in Heath (PATH) COOP Agreement; Building rehabilitation to support local production of medical barrier materials	
110-0006	Food Systems Restructuring	no date	Catagorical Exclusion for Training/ Positive	Ukraine	Chicken Production Processing and Distribution Subgrant	
110-0006	Food Systems Restructuring	no date	Catagorical Exclusion for Training/ Positive	Ukraine	"Global Agricultural Mangement and Enterprise, Sumy Farm	

					Service Center"
110-0006	Food Systems Restructuring	March-97	Catagorical Exclusion for Training/ Positive	Ukraine	American Cyananids Farm Service Supply Enterprise
110-0006	Food Systems Restructuring	March-97	Catagorical Exclusion for Training/ Positive	Ukraine	Cargill Fertilizer Blending Operation
110-0006	Food Systems Restructuring	June-97	Catagorical Exclusion for Training/ Positive	Ukraine	Soybean Seeds and Farm Service Center
110-0006	Food Systems Restructuring	May-98	Negative Determination	Ukraine	NutriFeeds Animal Health and Nutrition Center
110-0006	Food Systems Restructuring	May-98	Positive Determination	Ukraine	"Farm Service Center and Trasnport, Storage and Distribution of Agricultural Pesticides and Chemicals."
110-0006	Food Systems Restructuring	May-98	Positive Determination	Ukraine	Agricenter Odessa
110-0006	Food Systems Restructuring	April-98	Positive Determination	Ukraine	Farm Supply Center supplying fertilizer
110-0006	Food Systems Restructuring	April-98	Categorical Exclusion	Ukraine	The Ukrainian Agricultural Development Company
110-0006	Food Systems Restructuring	June-98	Positive Determination	Ukraine	Private Farm Commercialization Project - Agribusiness Partnerships II Program (CNFA)
110-0006	Food Systems Restructuring	April-98	Positive Determination/Categorical exclusion for training system	Ukraine	Tchabany Farm Service Center
110-0006	Food Systems Restructuring	May-98	Positive Determination	Ukraine	"Commodities International enhanced chicken production, processing and distribution."
110-0006	Food Systems Restructuring	September-99	Positive Determination	Ukraine	Service Network (Joint venture with UkrAgroBusiness)
	Energy Efficiency Investments for Climate Change Mitigation Project	12/8/00	Categorical Exclusion	Ukraine	USAID Grant to UN Fund for International Parnerships
SO 1.3c	Project 0005; 5.7 Small and New Business	1/19/2001	Categorical Exclusion	Ukraine	MTM Productivity Study Tours

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110-0002	Energy Efficiency and Market Reform	6	November-94	Categorical Exclusion	"NIS, Ukraine"			
110-0009	Economic Restructuring		March-96	Categorical Exclusion	Ukraine		Econtomic Restructuring and Financial Sector Reform	
121-0007	Corporate Governance Program		Jan. 29, 2001	Categorical Exclusion	Ukraine		Prepared by: Hugh Haworth	Carl Maxwell

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110-0006	Food Systems Restructuring	01/05/95	Ukraine	Food Systems Restructuring Project: Kiev-Atlantic; Freedom Farms; Cargill; and Monsanto		
110-0006	Food Systems Restructuring		Ukraine	Cargill Seed Production and Processing Project		
110-0006	Food Systems Restructuring	08/05/97	Ukraine	"Pure Sunshine Fruit Juice and Food Processing Packaging, Technical Assistance Facility Remodeling and Laboratory Development"		
110-0002	Energy Efficiency and Market Reform	Feb 95 (draft)	Ukraine	Tartar Water and Sanitation Project		
110-0006	Food Systems Restructuring	07/30/97	Ukraine	Cargill Fertilizer Blending Operation		
110-0006	Food Systems Restructuring	08/01/98	Ukraine	Uman Dairy Operation		
110-0006	Food Systems Restructuring	09/02/98	Ukraine	UkrAgrosystems Cusom Farming and Agribusiness Training Center		
110-0006	Food Systems Restructuring	04/01/98	Ukraine, Moldova, Belarus	American Cyanamid Pesticide Warehouse and Distribution Network		
		Approve August 17, 1999	Ukraine and Moldova	APII Project: AGCO Farm Machinery Service Centers, Cargill Fertilizer, CIL 2 Poultery , New Holland Farm Machinery Center, Norsk Hydro Fertilizer Operation, and Moldocom Farm Service Center.		Approval of the above EAs

Search Again!

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Welcome to inside USAID the Intranet

Bureaus | Sectors | Regions | Missions | Resources | References

SECURITY & PRIVACY

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GENERAL SITE INFO

Site Index
What's New
Navigating @USAID
How to add your site
@USAID Guidelines

Tools

ADS
Banyan Intranet Connect (BIC)
CDIE
ES Samples
EXO Toolbox
Human Resources
Outlook Web Access (OWA)
Per Diem Rates
2002 R4 Database
USAID Forms
Agency Resources...

FIND IT!

Search @USAID Find It! Go!

People Finder Last_Name Go!

QUICK PICKS

Info Mgmt Strategy
Phoenix
Craighead Countries
Ethics Homepage
LS Training
Online Communities
Ops Governance
USAID External Web
Mission Support

FEATURED LINKS

Fair Act Report
Dakshinayan
IDC Virtual Library
IIED

USAID & the Environment

Environmental Laws, Regulations and Procedures

Environment Home >> Environmental Laws, Regulations and Procedures

What We Do

Where We Work

What We Spend

Who We Are

Environmental Laws, Regulations and Procedures

USAID Environmental Publications

Environmental Business Opportunities

How To Get Involved

Links

Site Index

Tuesday, 05-Sep-2000 12:18:35 EDT

Exchanges

As a U.S. Government agency, USAID is subject to all applicable U.S. laws, regulations, and procedures that ensure the wise use of taxpayers' money and that environmental factors and values are fully integrated into our decision-making process. Full implementation of these laws, regulations, and procedures also ensures that the development activities USAID undertakes are not only environmentally sound, but also economically sustainable and protective of the world's environment in which we all live. Key environmental laws, regulations, and procedures are coordinated and enforced by the Agency Environmental Coordinator and his/her staff who are based in the Bureau for Policy and Program Coordination

They include the following:

- 22 CFR 216: Agency Environmental Procedures
- Major Functional Series 200: USAID Program Assistance Automated Directives System, Chapter 204 - Application of Environmental Procedures
- 22 USC Sec. 262m: Governing Procedures for USAID Environmental Impact Monitoring of Multilateral Development Banks

- *Foreign Assistance Act*
(Note: The entire document is more than 763 pages)
- Foreign Assistance Act, Part I, Section 117 - Environment and Natural Resources
- Foreign Assistance Act, Part I, Section 118 - Tropical Forests
- Foreign Assistance Act, Part I, Section 119 - Endangered Species
- Foreign Assistance Act, Part I, Chapter 7 - Debt for Nature

- Federal procedures for safe use of genetically engineered organisms (upcoming)

(Note: These laws, regulations, and procedures are not environmental programming procedures nor implementation measures used only for environmental programs)

Additional pertinent legislation in which USAID shares responsibility with others includes the following:

- Foreign Assistance Act, Part IV - Enterprise for the Americas Initiative
- Public Law 480, The Food for Peace Act, Title VI - Enterprise for the Americas Initiative, Additional Legislation
- Foreign Assistance Act, Part V - Tropical Forest Conservation Act

- Executive Order 13028: Implementation of the Enterprise for the Americas Initiative
- Executive Order 13089: Coral Reef Protection
- Executive Order 13112: Invasive Species
- Executive Order 13131: Implementation of the Enterprise for the Americas Initiative
- Executive Order 13158: Marine Protected Areas

Home | Privacy | What's New? | Directory | Missions | Employment | Search
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World Health Organization Publications 1991-2000

| WHO home page | Catalogue table of contents |
| How to order | WHO sales agents | Contact information |

Water supply, sanitation

- Related WHO Web site
- New guide on Toxic Cyanobacteria in Water

- Just published!
- Frequently requested reports
- WHO Technical Report series
- How to order
- WHO sales agents

- Analysis of Wastewater for Use in Agriculture
- Financial Management of Water Supply and Sanitation
- Food, Water and Family Health
- Guide to the Development of On-site Sanitation (A)
- Guidelines for Drinking-water Quality. Vol. 1: Recommendations
- Guidelines for Drinking-water Quality. Vol. 2: Health Criteria and Other Supporting Information
- Guidelines for Drinking-water Quality. Vol. 3: Surveillance and Control of Community Water Supplies
- Guidelines for Drinking-water Quality. Addendum to Volume 1: Recommendations
- Guidelines for Drinking-water Quality. Addendum to Volume 2: Health Criteria and Other Supporting Information
- Guidelines for the Safe Use of Wastewater and Excreta in Agriculture and Aquaculture
- Operation and Maintenance of Urban Water Supply and Sanitation Systems
- Parasitic Diseases in Water Resources Development
- PHAST Initiative (The) Participatory Hygiene and Sanitation Transformation
- PHAST Step-by-Step Guide: A Participatory Approach for the Control of Diarrhoeal Disease
- Sanitation Promotion
- Surface Water Drainage for Low-income Communities
- Water and Sanitation in Islam

Analysis of Wastewater for Use in Agriculture
A Laboratory Manual of Parasitological and Bacteriological Techniques

R.M. Ayres and *D.D. Mara*
1996, iv + 31 pages [E, F, S*]
ISBN 92 4 154484 8
Sw.fr. 12.-/US $10.80; in developing countries: Sw.fr. 8.40
Order no. 1150432

An illustrated guide to the laboratory analysis of treated wastewater intended for use in agriculture. Noting that the use of wastewater for crop irrigation is becoming increasingly common, the book aims to help laboratories ensure that wastewaters intended for agricultural use comply with WHO guideline values for microbiological quality. These values were previously established by WHO in order to protect against the risk that wastewater irrigation may facilitate the transmission of excreta-related diseases. Two major risks are addressed: the transmission of intestinal nematode infections to crop consumers and agricultural workers, and the transmission to crop consumers of faecal bacterial diseases, including bacterial diarrhoea and dysentery, typhoid, and cholera.

Analytical procedures recommended in the manual are simple and effective, require minimum equipment, and

 47

be carried out by persons with little or no previous parasitological or microbiological experience. All procedures are fully explained and clearly illustrated in over 40 photographs, including 20 colour plates. Relevant laboratory skills are also explained with the aim of encouraging standardized performance of procedures.

The manual has three chapters. The first, on sanitary parasitology, provides full details for the performance of the modified Bailenger method for the enumeration of intestinal helminth eggs in wastewater. A brief explanation of the advantages and disadvantages of this method is followed by a list of the simple equipment and consumables required, and an illustrated guide to each step in the analysis. Chapter two, on sanitary bacteriology, provides similarly detailed information for three procedures recommended for the enumeration of faecal coliform bacteria: two most probable number methods and a membrane filtration method. The final chapter sets out guidelines for conducting routine monitoring of faecal coliforms and helminth eggs.

Financial Management of Water Supply and Sanitation
A Handbook

1994, x + 83 pages [C, E, F, S]
ISBN 92 4 154472 4
Sw.fr. 20.-/US $18.00; in developing countries: Sw.fr. 14.-
Order no. 1150419

Describes a range of financial principles and methods for improving the management of water supply and sanitation services - whether large or small, urban or rural. Addressed to decision-makers, the book shows how financial mechanisms, such as cost recovery, cash raising, and cost containment, can be used to ensure that services are financially sustainable and able to meet users' needs. With this goal in mind, the book helps readers to think through all costs and responsibilities associated with each stage in a project's life span, and then to use this information to set objectives and calculate costs and benefits. Material in the handbook was tested in 20 countries and then further refined in seminars involving over 1000 participants.

The book has two parts. Part one introduces some of the underlying principles for ascertaining that all resources required for services are identified and available. Information ranges from a list of obstacles commonly encountered in developing countries to tips on how to reduce costs and increase revenue. The second and most extensive part provides a practical guide to methods of cost recovery. Using numerous checklists, charts, examples, and schedules for calculating projected costs, chapters offer a step-by-step explanation of the financial and related activities required to achieve cost recovery at each stage in a project's life span, moving from planning and construction, through operation and maintenance, to eventual replacement.

"... While designed primarily as a guide for operation and control activities, the book will be of interest to a wide range of planners, project officers and other professionals in water and sanitation agencies..."
— Consumer Currents

Food, Water and Family Health
A Manual for Community Educators

1994, v + 99 pages [E]
WHO/HEP/94.2
Sw.fr. 17.–/US $15.30; in developing countries: Sw.fr. 11.90
Order no. 1930130

An illustrated manual, for use in health education, that encourages poor rural communities to introduce simple environmental modifications to promote health and prevent disease. Particular attention is given to elements of basic hygiene and sanitation that protect children from diarrhoeal disease. Written in a simple yet lively narrative style, the manual uses vivid stories, dialogue, and drawings to make its vital health messages relevant to the community setting. Information ranges from drawings illustrating the construction of filtration systems for drinking-water, through instructions for mixing oral rehydration salts, to advice on how fast-breeding fish species can be used to control mosquito larvae and improve nutrition.

The manual has four teaching units. The first, on healthy water and better sanitation, discusses problems associated with water, describes ways to keep the water supply safe, and sets out some simple "golden rules" for safe water. The unit also gives advice on how to construct and maintain latrines and how to ensure that water is safe to drink. Stories and activities presented in unit two explain how simple environmental modifications can help control several diseases, including diarrhoea, Guinea worm disease, schistosomiasis, and malaria and other mosquito-borne diseases. Information about HIV infection and the care of people with AIDS is also included.

Healthy food is covered in the third unit, which presents basic facts about nutrition, food safety, the multiple advantages of breast-feeding, appropriate weaning foods, and the protection of children's eyes through basic hygiene and adequate vitamin A intake. The unit also offers advice on healthy food choices when family income is limited. The final unit, on family health, covers nutrition and care during pregnancy, the importance of birth-spacing, and the value of immunization. A list of resources for further information concludes the manual.

A Guide to the Development of On-site Sanitation

R. Franceys, J. Pickford and *R. Reed*
1992, viii + 237 pages [E, F, S]
ISBN 92 4 154443 0
Sw.fr. 47.-/US $42.30; in developing countries: Sw.fr. 32.90
Order no. 1150380

Provides detailed practical and technical advice intended to guide the selection, design, construction, and maintenance of on-site facilities for the removal of human excreta. Addressed to engineers, sanitarians, medical officers, and project planners, the book concentrates on technical options suitable for householders building their own latrines, whether in small communities, rural areas, or deprived urban settlements. Details range from line drawings illustrating features of design and construction, through a list of reasons why improved sanitation may elicit negative responses from users, to instructions for calculating the internal dimensions of a septic tank.

The book features eleven chapters in three parts. Chapters in the first part introduce the foundations of sanitary practice, describe the links between excreta and disease, and explain the numerous social and cultural factors that must be considered at the planning phase. Chapters in the second and most extensive part provide a technical guide to the design, construction, operation and maintenance of all the main options for on-site sanitation. Chapters describe how the different types of latrine work, discuss their relative merits, and set out detailed plans for the construction of latrines and their components. The final part features three chapters on the planning and development of on-site sanitation projects, underscoring the need for a thorough analysis of cultural as well as design features.

"... an intriguing book..."
— International Journal of Environmental Studies

Guidelines for Drinking-water Quality
Volume 1: Recommendations
Second edition

(see also the updated addendum to this volume)

1993, x + 188 pages [C, E, F, R, S]
ISBN 92 4 154460 0
Sw.fr. 46.-/US $41.40; in developing countries: Sw.fr. 32.20
Order no. 1151404

Sets out guideline values for a large number of water contaminants relevant to the quality of drinking-water. The book also provides an explanation of how the guideline values should be applied, the criteria used in selecting the various chemical, physical, microbiological, and radiological contaminants considered, a description of the approaches used to derive the guideline values, and brief summary statements supporting the values recommended or explaining why no health-based guideline value is necessary at present.

SEC. 117 Environment and Natural Resources

SEC. 118. Tropical Forests

SEC. 119 Endangered Species (Biodiversity)

USAID Missions are legally obligated (Section 117) to conduct an assessment of tropical forestry and biological diversity in accordance with Section 118 and 119 of the Foreign Assistance Act (FAA).

(5)[69] the extent to which each country has extended protection to refugees, including the provision of first asylum and resettlement;[71]

(6)[69,71] the steps the Administrator has taken to alter United States programs under this part in any country because of human rights considerations; and

(7)[70,71] wherever applicable, violations of religious freedom, including particularly severe violations of religious freedom (as defined in section 3 of the International Religious Freedom Act of 1998).

(e)[63,72] The President is authorized and encouraged to use not less than $3,000,000 of the funds made available under this chapter, chapter 10 of this part,[73] and chapter 4 of part II for each fiscal year for studies to identify, and for openly carrying out, programs and activities which will encourage or promote increased adherence to civil and political rights, including the right to free religious belief and practice,[74] as set forth in the Universal Declaration of Human Rights, in countries eligible for assistance under this chapter or under chapter 10 of this part, except that funds made available under chapter 10 of this part may only be used under this subsection with respect to countries in sub-Saharan Africa. None of these funds may be used, directly or indirectly, to influence the outcome of any election in any country.

Sec. 117.[75] Assistance for Disadvantaged South Africans.—* * * [Repealed—1993]

Sec. 117.[76] Environment and Natural Resources.—(a) The Congress finds that if current trends in the degradation of natural resources in developing countries continue, they will severely undermine the best efforts to meet basic human needs, to achieve sustained economic growth, and to prevent international tension and conflict. The Congress also finds that the world faces enormous, urgent, and complex problems, with respect to natural resources, which require new forms of cooperation between the United States and developing countries to prevent such problems from becoming unmanageable. It is, therefore, in the economic and security interests of the United States to provide leadership both in thoroughly reassessing policies relating to natural resources and the environ-

[71] Sec. 102(d)(1) of the International Religious Freedom Act of 1998 (Public Law 105–292; 112 Stat. 2794) struck out "and" at the end of para. (4); replaced a period at the end of this para. (5) with "; and"; and added a new para. (6). Paras. (4) and (5), however, had already been redesignated as paras. (5) and (6) by sec. 2216 of Public Law 105–277. Sec. 2216 of Public Law 105–277 also redesignated a then-nonexistent para. (6) as para. (7). The amendment has been made to the subsequently enacted para. (6), shown here as para. (7).

[72] The first phrase, "The President is authorized and encouraged to use not less than", was added by sec. 109(1) of the International Development and Food Assistance Act of 1978 (Public Law 95–424; 92 Stat. 947).

The authorization level of $3,000,000 and the reference to funds available under chapter 4 of part II were added by sec. 1002(a)(1) of the Department of State Authorization Act, Fiscal Years 1984 and 1985 (Public Law 98–164; 97 Stat. 1052). Previously, amendments by sec. 306 of the International Security and Development Cooperation Act of 1981 (Public Law 97–113; 95 Stat. 1533), sec. 504 of Public Law 96–533 (94 Stat. 378), and sec. 109(2) of Public Law 95–424 (92 Stat. 947) authorized the use of $1,500,000 for this purpose in fiscal years 1982–1983, fiscal year 1981, and fiscal year 1979, respectively. The original text of subsec. (e), added by sec. 111 of Public Law 95–88 (91 Stat. 537), authorized the use of $750,000 for this purpose during fiscal year 1978.

The authorization level of $1,500,000 for the fiscal year 1986 and for each fiscal year thereafter was added by sec. 202 of Public Law 99–440 (100 Stat. 1095).

Paragraph designation "(1)" and a new par. (2) were added to subsec. (e) by sec. 1002(a)(3) of the Department of State Authorization Act, Fiscal Years 1984 and 1985 (Public Law 98–164; 97 Stat. 1052). Par. (2) subsequently was repealed by sec. 4(a)(3)(B) of the South African Democratic Transition Support Act of 1993 (Public Law 103–149; 107 Stat. 1505), and the designation for par. (1) was struck out.

Par. (2) of subsec. (e) had stated a priority, with supporting guidelines and conditions, for giving grants to "nongovernmental organizations in South Africa promoting political, economic, social, juridical, and humanitarian efforts to foster a just society and to help victims of apartheid.".

Section 4(a)(3)(B) of the South African Democratic Transition Support Act of 1993 (Public Law 103–149; 107 Stat. 1505) also repealed subsec. (f) and (g) of sec. 116, which had been added by sec. 202(b) of Public Law 99–440 (100 Stat. 1095).

Subsec. (f) directed not less than $500,000 under section (e)(2)(A) to be used "for direct legal and other assistance to political detainees and prisoners and their families, including the investigation of the killing of protesters and prisoners, and for support for actions of black-led community organizations to resist, through nonviolent means, the enforcement of apartheid policies...".

Subsec. (g) directed $175,000 each fiscal year to "be used for direct assistance to families of victims of violence such as 'necklacing' and other such inhumane acts", and another $175,000 to "be made available to black groups in South Africa which are actively working toward a multi-racial solution to the sharing of political power in that country through nonviolent, constructive means.".

[73] Sec. 562 of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1991 (Public Law 101–513; 104 Stat. 2026), added a new chapter 10 to part I of this Act, providing for long-term development in sub-Saharan Africa, and made a conforming amendment by inserting ", chapter 10 of this part," here, and text at the end of the first sentence beginning at "or under chapter 10".

[74] Sec. 501(b) of the International Religious Freedom Act of 1998 (Public Law 105–292; 112 Stat. 2811) inserted ", including the right to free religious belief and practice" after "adherence to civil and political rights". Subsec. (a) of that sec. provided the following:

"SEC. 501. ASSISTANCE FOR PROMOTING RELIGIOUS FREEDOM.

"(a) FINDINGS.—Congress makes the following findings:

"(1) In many nations where severe violations of religious freedom occur, there is not sufficient statutory legal protection for religious minorities or there is not sufficient cultural and social understanding of international norms of religious freedom.

"(2) Accordingly, in the provision of foreign assistance, the United States should make a priority of promoting and developing legal protections and cultural respect for religious freedom.".

[75] Formerly at 22 U.S.C. 2151o. Sec. 117 was repealed by sec. 4(a)(3)(B) of the South African Democratic Transition Support Act of 1993 (Public Law 103–149; 107 Stat. 1505). It had been added originally by sec. 201(b) of Public Law 99–440 (100 Stat. 1094). Sec. 117 provided assistance for disadvantaged South Africans through South African nongovernmental organizations, such as the Educational Opportunities Council, the South African Institute of Race Relations, READ, professional teachers' unions, the Outreach Program of the University of the Western Cape, the Funda Center in Soweto, SACHED, UPP Trust, TOPS, the Wilgespruit Fellowship Center (WFC), and civic and other organizations working at the community level which did not receive funds from the Government of South Africa.

A previous sec. 117, relating to infant nutrition, was repealed in 1978.

[76] 22 U.S.C. 2151p. Sec. 117 was redesignated from being sec. 118 by sec. 301(1) of Public Law 99–529, resulting in the creation of two sections 117. Sec. 301(2) of Public Law 99–529 (100 Stat. 3014) further deleted subsec. (d) of that section, which dealt with tropical forests, and then sec. 301(3) of Public Law 99–529 added a new section 118 entitled "Tropical Forests". This section, as added by sec. 113 of Public Law 95–88 (91 Stat. 537) and amended by sec. 110 of Public Law 95–424 (92 Stat. 948) and sec. 122 of Public Law 96–53 (93 Stat. 948), was further amended and restated by sec. 307 of the International Security and Development Cooperation Act of 1981 (Public Law 97–113; 95 Stat. 1533). This section previously read as follows:

"Sec. 118. Environment and Natural Resources.—(a) The President is authorized to furnish assistance under this part for developing and strengthening the capacity of less developed countries to protect and manage their environment and natural resources. Special efforts shall be made to maintain and where possible restore the land, vegetation, water, wildlife and other resources upon which depend economic growth and human well-being especially that of the poor.

"(b) In carrying out programs under this chapter, the President shall take into consideration the environmental consequence of development actions.".

See also sec. 517(e) of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1999 (division A, sec. 101(d) of Public Law 105–277; 112 Stat. 2681), relating to assistance to the new independent states of the former Soviet Union.

See also sec. 534 of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1990 (Public Law 101–167; 103 Stat. 1228), as amended, relating to "Global Warming Initiative".

See also sec. 533 of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1991 (Public Law 101–513; 104 Stat. 2013), as amended, relating to "Environment and Global Warming".

See also sec. 532 of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1993 (Public Law 102–391; 106 Stat. 1666), relating to "Environment".

57

ment, and in cooperating extensively with developing countries in order to achieve environmentally sound development.

(b) In order to address the serious problems described in subsection (a), the President is authorized to furnish assistance under this part for developing and strengthening the capacity of developing countries to protect and manage their environment and natural resources. Special efforts shall be made to maintain and where possible to restore the land, vegetation, water, wildlife, and other resources upon which depend economic growth and human well-being, especially of the poor.

(c)(1) The President, in implementing programs and projects under this chapter and chapter 10 of this part,[77] shall take fully into account the impact of such programs and projects upon the environment and natural resources of developing countries. Subject to such procedures as the President considers appropriate, the President shall require all agencies and officials responsible for programs or projects under this chapter—

(A) to prepare and take fully into account an environmental impact statement for any program or project under this chapter significantly affecting the environment of the global commons outside the jurisdiction of any country, the environment of the United States, or other aspects of the environment which the President may specify; and

(B) to prepare and take fully into account an environmental assessment of any proposed program or project under this chapter significantly affecting the environment of any foreign country.

Such agencies and officials should, where appropriate, use local technical resources in preparing environmental impact statements and environmental assessments pursuant to this subsection.

(2) The President may establish exceptions from the requirements of this subsection for emergency conditions and for cases in which compliance with those requirements would be seriously detrimental to the foreign policy interests of the United States.

Sec. 118.[78] Tropical Forests.

(a) IMPORTANCE OF FORESTS AND TREE COVER.—In enacting section 103(b)(3) of this Act the Congress recognized the importance of forests and tree cover to the developing countries. The Congress is particularly concerned about the continuing and accelerating alteration, destruction, and loss of tropical forests in developing countries, which pose a serious threat to development and the environment. Tropical forest destruction and loss—

(1) result in shortages of wood, especially wood for fuel; loss of biologically productive wetlands; siltation of lakes, reservoirs, and irrigation systems; floods; destruction of indigenous peoples; extinction of plant and animal species; reduced capacity for food production; and loss of genetic resources; and

[77] Sec. 562 of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1991 (Public Law 101–513; 104 Stat. 2026), added a new chapter 10 to part I of this Act, providing for long-term development in sub-Saharan Africa, and made a conforming amendment by inserting "and chapter 10 of this part" here.

[78] 22 U.S.C. 2151p–1. Sec. 118 was added by sec. 301(3) of Public Law 99–529 (100 Stat. 3014). See also footnote 76.

(2) can result in desertification and destabilization of the earth's climate.

Properly managed tropical forests provide a sustained flow of resources essential to the economic growth of developing countries, as well as genetic resources of value to developed and developing countries alike.

(b) PRIORITIES.—The concerns expressed in subsection (a) and the recommendations of the United States Interagency Task Force on Tropical Forests shall be given high priority by the President—

(1) in formulating and carrying out programs and policies with respect to developing countries, including those relating to bilateral and multilateral assistance and those relating to private sector activities; and

(2) in seeking opportunities to coordinate public and private development and investment activities which affect forests in developing countries.

(c) ASSISTANCE TO DEVELOPING COUNTRIES.—In providing assistance to developing countries, the President shall do the following:

(1) Place a high priority on conservation and sustainable management of tropical forests.

(2) To the fullest extent feasible, engage in dialogues and exchanges of information with recipient countries—

(A) which stress the importance of conserving and sustainably managing forest resources for the long-term economic benefit of those countries, as well as the irreversible losses associated with forest destruction, and

(B) which identify and focus on policies of those countries which directly or indirectly contribute to deforestation.

(3) To the fullest extent feasible, support projects and activities—

(A) which offer employment and income alternatives to those who otherwise would cause destruction and loss of forests, and

(B) which help developing countries identify and implement alternatives to colonizing forested areas.

(4) To the fullest extent feasible, support training programs, educational efforts, and the establishment or strengthening of institutions which increase the capacity of developing countries to formulate forest policies, engage in relevant land-use planning, and otherwise improve the management of their forests.

(5) To the fullest extent feasible, help end destructive slash-and-burn agriculture by supporting stable and productive farming practices in areas already cleared or degraded and on lands which inevitably will be settled, with special emphasis on demonstrating the feasibility of agroforestry and other techniques which use technologies and methods suited to the local environment and traditional agricultural techniques and feature close consultation with and involvement of local people.

(6) To the fullest extent feasible, help conserve forests which have not yet been degraded, by helping to increase production on lands already cleared or degraded through support of reforestation, fuelwood, and other sustainable forestry projects and

practices, making sure that local people are involved at all stages of project design and implementation.

(7) To the fullest extent feasible, support projects and other activities to conserve forested watersheds and rehabilitate those which have been deforested, making sure that local people are involved at all stages of project design and implementation.

(8) To the fullest extent feasible, support training, research, and other actions which lead to sustainable and more environmentally sound practices for timber harvesting, removal, and processing, including reforestation, soil conservation, and other activities to rehabilitate degraded forest lands.

(9) To the fullest extent feasible, support research to expand knowledge of tropical forests and identify alternatives which will prevent forest destruction, loss, or degradation, including research in agroforestry, sustainable management of natural forests, small-scale farms and gardens, small-scale animal husbandry, wider application of adopted traditional practices, and suitable crops and crop combinations.

(10) To the fullest extent feasible, conserve biological diversity in forest areas by—

(A) supporting and cooperating with United States Government agencies, other donors (both bilateral and multilateral), and other appropriate governmental, intergovernmental, and nongovernmental organizations in efforts to identify, establish, and maintain a representative network of protected tropical forest ecosystems on a worldwide basis;

(B) whenever appropriate, making the establishment of protected areas a condition of support for activities involving forest clearance of degradation; and

(C) helping developing countries identify tropical forest ecosystems and species in need of protection and establish and maintain appropriate protected areas.

(11) To the fullest extent feasible, engage in efforts to increase the awareness of United States Government agencies and other donors, both bilateral and multilateral, of the immediate and long-term value of tropical forests.

(12) To the fullest extent feasible, utilize the resources and abilities of all relevant United States Government agencies.

(13) Require that any program or project under this chapter significantly affecting tropical forests (including projects involving the planting of exotic plant species)—

(A) be based upon careful analysis of the alternatives available to achieve the best sustainable use of the land, and

(B) take full account of the environmental impacts of the proposed activities on biological diversity,

as provided for in the environmental procedures of the Agency for International Development.

(14) Deny assistance under this chapter for—

(A) the procurement or use of logging equipment, unless an environmental assessment indicates that all timber harvesting operations involved will be conducted in an environmentally sound manner which minimizes forest destruction and that the proposed activity will produce positive economic benefits and sustainable forest management systems; and

(B) actions which significantly degrade national parks or similar protected areas which contain tropical forests or introduce exotic plants or animals into such areas.

(15) Deny assistance under this chapter for the following activities unless an environmental assessment indicates that the proposed activity will contribute significantly and directly to improving the livelihood of the rural poor and will be conducted in an environmentally sound manner which supports sustainable development:

(A) Activities which would result in the conversion of forest lands to the rearing of livestock.

(B) The construction, upgrading, or maintenance of roads (including temporary haul roads for logging or other extractive industries) which pass through relatively undegraded forest lands.

(C) The colonization of forest lands.

(D) The construction of dams or other water control structures which flood relatively undegraded forest lands.

(d) PVOs AND OTHER NONGOVERNMENTAL ORGANIZATIONS.—Whenever feasible, the President shall accomplish the objectives of this section through projects managed by private and voluntary organizations or international, regional, or national nongovernmental organizations which are active in the region or country where the project is located.

(e) COUNTRY ANALYSIS REQUIREMENTS.—Each country development strategy statement or other country plan prepared by the Agency for International Development shall include an analysis of—

(1) the actions necessary in that country to achieve conservation and sustainable management of tropical forests, and

(2) the extent to which the actions proposed for support by the Agency meet the needs thus identified.

(f) ANNUAL REPORT.—Each annual report required by section 634(a) of this Act shall include a report on the implementation of this section.

Sec. 119.[79] Renewable and Unconventional Energy Technologies. * * * [Repealed—1980]

Sec. 119.[80] Endangered Species.—(a) The Congress finds the survival of many animal and plant species is endangered by overhunting, by the presence of toxic chemicals in water, air and soil, and by the destruction of habitats. The Congress further finds that the extinction of animal and plant species is an irreparable loss with potentially serious environmental and economic consequences

[79] Sec. 119, as added by Public Law 95-88 (91 Stat. 528), amended by sec. 111 of the International Development and Food Assistance Act of 1978 (92 Stat. 948), and by sec. 107 of the International Development Cooperation Act of 1979 (93 Stat. 362), was repealed by sec. 304(g) of the International Security and Development Cooperation Act of 1980 (Public Law 96-533; 94 Stat. 3147). See sec. 106 of this Act for text concerning energy technologies.

[80] 22 U.S.C. 2151q. Sec. 119, pars. (a) and (b) were added by sec. 702 of the International Environment Protection Act of 1983 (title VII of the Department of State Authorization Act, Fiscal Years 1984 and 1985, Public Law 98-164; 97 Stat. 1045).

for developing and developed countries alike. Accordingly, the preservation of animal and plant species through the regulation of the hunting and trade in endangered species, through limitations on the pollution of natural ecosystems, and through the protection of wildlife habitats should be an important objective of the United States development assistance.

(b)[80] In order to preserve biological diversity, the President is authorized to furnish assistance under this part, notwithstanding section 660,[81] to assist countries in protecting and maintaining wildlife habitats and in developing sound wildlife management and plant conservation programs. Special efforts should be made to establish and maintain wildlife sanctuaries, reserves, and parks; to enact and enforce anti-poaching measures; and to identify, study, and catalog animal and plant species, especially in tropical environments.

(c)[82] FUNDING LEVEL.—For fiscal year 1987, not less than $2,500,000 of the funds available to carry out this part (excluding funds made available to carry out section 104(c)(2), relating to the Child Survival Fund) shall be allocated for assistance pursuant to subsection (b) for activities which were not funded prior to fiscal year 1987. In addition, the Agency for International Development shall, to the fullest extent possible, continue and increase assistance pursuant to subsection (b) for activities for which assistance was provided in fiscal years prior to fiscal year 1987.

(d)[82] COUNTRY ANALYSIS REQUIREMENTS.—Each country development strategy statement or other country plan prepared by the Agency for International Development shall include an analysis of—

(1) the actions necessary in that country to conserve biological diversity, and

(2) the extent to which the actions proposed for support by the Agency meet the needs thus identified.

(e)[82] LOCAL INVOLVEMENT.—To the fullest extent possible, projects supported under this section shall include close consultation with and involvement of local people at all stages of design and implementation.

(f)[82] PVOS AND OTHER NONGOVERNMENTAL ORGANIZATIONS.—Whenever feasible, the objectives of this section shall be accomplished through projects managed by appropriate private and voluntary organizations, or international, regional, or national nongovernmental organizations, which are active in the region or country where the project is located.

(g)[82] ACTIONS BY AID.—The Administrator of the Agency for International Development shall—

(1) cooperate with appropriate international organizations, both governmental and nongovernmental;

(2) look to the World Conservation Strategy as an overall guide for actions to conserve biological diversity;

(3) engage in dialogues and exchanges of information with recipient countries which stress the importance of conserving biological diversity for the long-term economic benefit of those countries and which identify and focus on policies of those countries which directly or indirectly contribute to loss of biological diversity;

(4) support training and education efforts which improve the capacity of recipient countries to prevent loss of biological diversity;

(5) whenever possible, enter into long-term agreements in which the recipient country agrees to protect ecosystems or other wildlife habitats recommended for protection by relevant governmental or nongovernmental organizations or as a result of activities undertaken pursuant to paragraph (6), and the United States agrees to provide, subject to obtaining the necessary appropriations, additional assistance necessary for the establishment and maintenance of such protected areas;

(6) support, as necessary and in cooperation with the appropriate governmental and nongovernmental organizations, efforts to identify and survey ecosystems in recipient countries worthy of protection;

(7) cooperate with and support the relevant efforts of other agencies of the United States Government, including the United States Fish and Wildlife Service, the National Park Service, the Forest Service, and the Peace Corps;

(8) review the Agency's environmental regulations and revise them as necessary to ensure that ongoing and proposed actions by the Agency do not inadvertently endanger wildlife species or their critical habitats, harm protected areas, or have other adverse impacts on biological diversity (and shall report to the Congress within a year after the date of enactment of this paragraph on the actions taken pursuant to this paragraph);

(9) ensure that environmental profiles sponsored by the Agency include information needed for conservation of biological diversity; and

(10) deny any direct or indirect assistance under this chapter for actions which significantly degrade national parks or similar protected areas or introduce exotic plants or animals into such areas.

(h)[82] ANNUAL REPORTS.—Each annual report required by section 634(a) of this Act shall include, in a separate volume, a report on the implementation of this section.

Sec. 120.[83] Sahel Development Program—Planning.—(a) The Congress reaffirms its support of[84] the initiative of the United States Government in undertaking consultations and planning with the countries concerned, and with other nations providing assistance, with the United Nations, and with other concerned international and regional organizations, toward the development and

[81] Section 533(d)(4)(A) of the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 1990 (Public Law 101–167; 103 Stat. 1227), added "notwithstanding section 660" at this point.

[82] Pars. (c) through (h) were added by sec. 302 of Public Law 99–529 (100 Stat. 3017).

[83] 22 U.S.C. 2161r. Sec. 120, originally added as sec. 639B of this Act by sec. 20 of the FA Act of 1973 and later redesignated as sec. 494B by sec. 101(5) of Public Law 94–161 (89 Stat. 849), was again redesignated as sec. 120 by sec. 115(1) of the International Development and Food Assistance Act of 1977 (Public Law 95–88; 91 Stat. 539).

The title caption "Sahel Development Program—Planning" was inserted in lieu of "African Development Program" by sec. 115(2) of the International Development and Food Assistance Act of 1977 (Public Law 95–88; 91 Stat. 539).

[84] The words in the first sentence of subsec. (a), "reaffirms its support of", were substituted in lieu of "supports" by sec. 101(7)(C) of Public Law 94–161 (89 Stat. 849).

22 CFR 216

AGENCY ENVIRONMENTAL PROCEDURES

Preface
216.1 Introduction
216.2 Applicability of procedures
216.3 Procedures
216.4 Private applicants
216.5 Endangered species
216.6 Environmental assessments
216.7 Environmental impact statements
216.8 Public hearings
216.9 Bilateral and multi-lateral studies and concise reviews of environmental issues
216.10 Records and reports

These procedures have been revised based on experience with previous ones agreed to in settlement of a law suit brought against the Agency in 1975. The Procedures are Federal Regulations and therefore, it is imperative that they be followed in the development of Agency programs.

In preparing these Regulations, some interpretations and definitions have been drawn from Executive Order No. 12114 of January 1979, on the application of the National Environmental Policy Act (NEPA) to extraterritorial situations. Some elements of the revised regulations on NEPA issued by the President's Council on Environmental Quality have also been adopted. Examples are: The definition of significant impact, the concept of scoping of issues to be examined in a formal analysis, and the elimination of certain AID activities from the requirement for environmental review.

In addition, these procedures: 1) provide advance notice that certain types of projects will automatically require detailed environmental analysis thus eliminating one step in the former process and permitting early planning for this activity; 2) permit the use of specially prepared project design considerations or guidance to be substituted for environmental analysis in selected situations; 3) advocate the use of indigenous specialists to examine pre-defined issues during the project design stage; 4) clarify the role of the Bureau's Environmental Officer in the review and approval process, and 5) permit in certain circumstances, projects to go forward prior to completion of environmental analysis.

Note that only minimal clarification changes have been made in those sections dealing with the evaluation and selection of pesticides to be supported by AID in projects or of a non-project assistance activity.

INTERNATIONAL DEVELOPMENT COOPERATION AGENCY

U.S. Agency for International Development

22 CFR PART 216

ENVIRONMENTAL PROCEDURES

Authority: 42 U.S.C. 4332; 22 U.S.C. 2381.

Source: 41 FR 26913, June 30, 1976.

§216.1 Introduction

(a) **Purpose.** In accordance with sections 118(b) and 621 of the Foreign Assistance Act of 1961, as amended, (the FAA) the following general procedures shall be used by A.I.D. to ensure that

environmental factors and values are integrated into the A.I.D. decision-making process. These procedures also assign responsibility within the Agency for assessing the environmental effects of A.I.D.'s actions. These procedures are consistent with Executive Order 12114, issued January 4, 1979, entitled Environmental Effects Abroad of Major Federal Actions, and the purposes of the National Environmental Policy Act of 1970, as amended (42 U.S.C. 4371 et seq.)(NEPA). They are intended to implement the requirements of NEPA as they effect the A.I.D. program.

(b)**Environmental Policy**. In the conduct of its mandate to help upgrade the quality of life of the poor in developing countries, A.I.D. conducts a broad range of activities. These activities address such basic problems as hunger, malnutrition, overpopulation, disease, disaster, deterioration of the environment and the natural resource base, illiteracy as well as the lack of adequate housing and transportation. Pursuant to the FAA, A.I.D. provides development assistance in the form of technical advisory services, research, training, construction and commodity support. In addition. A.I.D. conducts programs under the Agricultural Trade Development and Assistance Act of 1954 (Pub. L. 480) that are designed to combat hunger, malnutrition and to facilitate economic development. Assistance programs are carried out under the foreign policy guidance of the Secretary of State and in cooperation with the governments of sovereign states. Within this framework, it is A.I.D. policy to:

(1) Ensure that the environmental consequences of A.I.D.financed activities are identified and considered by A.I.D. and the host country prior to a final decision to proceed and that appropriate environmental safeguards are adopted;

(2) Assist developing countries to strengthen their capabilities to appreciate and effectively evaluate the potential environmental effects of proposed development strategies and projects, and to select, implement and manage effective environmental programs;

(3) Identify impacts resulting from A.I.D.'s actions upon the environment, including those aspects of the biosphere which are the common and cultural heritage of all mankind; and

(4) Define environmental limiting factors that constrain development and identify and carry out activities that assist in restoring the renewable resource base on which sustained development depends.

(c) Definitions

(1) **CEQ Regulations**. Regulations promulgated by the President's Council on Environmental Quality (CEQ) (Federal Register, Volume 43, Number 230, November 29, 1978) under the authority of NEPA and Executive Order 11514, entitled Protection and Enhancement of Environmental Quality (March 5, 1970) as amended by Executive Order 11991 (May 24, 1977).

(2) **Initial Environmental Examination**. An Initial Environmental Examination is the first review of the reasonably foreseeable effects of a proposed action on the environment. Its function is to provide a brief statement of the factual basis for a Threshold Decision as to whether an Environmental Assessment or an Environmental Impact Statement will be required.

(3) **Threshold Decision**. A formal Agency decision which determines, based on an Initial Environmental Examination, whether a proposed Agency action is a major action significantly affecting the environment.

(4) **Environmental Assessment**. A detailed study of the reasonably foreseeable significant effects, both beneficial and adverse, of a proposed action on the environment of a foreign country or countries.

(5) **Environmental Impact Statement**. A detailed study of the reasonably foreseeable environmental impacts, both positive and negative, of a proposed A.I.D. action and its reasonable alternatives on the United States, the global environment or areas outside the jurisdiction of any nation as described in §216.7 of these procedures. It is a specific document having a definite format and content, as provided in NEPA and the CEQ Regulations. The required form and content of an Environmental Impact Statement is further described in §216.7 infra.

(6) **Project Identification Document (PID)**. An internal A.I.D. document which initially identifies and describes a proposed project.

(7) **Program Assistance Initial Proposal (PAIP)**. An internal A.I.D. document used to initiate and identify proposed nonproject assistance, including commodity import programs. It is analogous to the PID.

(8) **Project Paper (PP)**. An internal A.I.D. document which provides a definitive description and appraisal of the project and particularly the plan or implementation.

(9) **Program Assistance Approval Document (PAAD)**. An internal A.I.D. document approving nonproject assistance. It is analogous to the PP.

(10) **Environment**. The term environment, as used in these procedures with respect to effects occurring outside the United States, means the natural and physical environment. With respect to effects occurring within the United States see §216.7(b).

(11) **Significant Effect**. With respect to effects on the environment outside the United States, a proposed action has a significant effect on the environment if it does significant harm to the environment.

(12) **Minor Donor**. For purposes of these procedures, A.I.D. is a minor donor to a multidonor project when A.I.D. does not control the planning or design of the multidonor project and either

(i) A.I.D.'s total contribution to the project is both less than $1,000,000 and less than 25 percent of the estimated project cost, or

(ii) A.I.D.'s total contribution is more than $1,000,000 but less than 25 percent of the estimated project cost and the environmental procedures of the donor in control of the planning of design of the project are followed, but only if the A.I.D. Environmental Coordinator determines that such procedures are adequate.

§216.2 Applicability of procedures.

(a) **Scope**. Except as provided in §216.2(b), these procedures apply to all new projects, programs or activities authorized or approved by A.I.D. and to substantive amendments or extensions of ongoing projects, programs, or activities.

(b) **Exemptions**. (1) Projects, programs or activities involving the following are exempt from these procedures:

(i) International disaster assistance;

(ii) Other emergency circumstances; and

(iii) Circumstances involving exceptional foreign policy sensitivities.

(2) A formal written determination, including a statement of the justification therefore, is required for each project, program or activity for which an exemption is made under paragraphs (b)(l) (ii) and (iii) of this section, but is not required for projects, programs or activities under paragraph (b)(l)(i) of this section. The determination shall be made either by the Assistant Administrator having responsibility for the program, project or activity, or by the Administrator, where authority to approve financing has been reserved by the Administrator. The determination shall be made after consultation with CEQ regarding the environmental consequences of the proposed program, project or activity.

(c) **Categorical Exclusions**. (1) The following criteria have been applied in determining the classes of actions included in §216.2(c)(2) for which and Initial Environmental Examination, Environmental Assessment and Environmental Impact Statement generally are not required:

(i) The action does not have an effect on the natural or physical environment;

(ii) A.I.D. does not have knowledge of or control over, and the objective of A.I.D. in furnishing assistance does not require, either prior to approval of financing or prior to implementation of specific activities, knowledge of or control over, the details of the specific activities that have an effect on the physical and natural environment for which financing is provided by A.I.D.;

(iii) Research activities which may have an affect on the physical and natural environment but will not have a significant effect as a result of limited scope, carefully controlled nature and effective monitoring.

(2) The following classes of actions are not subject to the procedures set forth in §216.3, except to the extent provided herein;

(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);

(ii) Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored;

(iii)Analyses, studies, academic or research workshops and meetings;

(iv) Projects in which A.I.D. is a minor donor to a multidonor project and there is no potential significant effects upon the environment of the United States, areas outside any nation's jurisdiction or endangered or threatened species or their critical habitat;

(v) Document and information transfers;

(vi) Contributions to international, regional or national organizations by the United States which are not for the purpose of carrying out a specifically identifiable project or projects;

(vii) Institution building grants to research and educational institutions in the United States such as those provided for under section 122(d) and Title XII of Chapter 2 of Part I of the FAA (22 USCA §§2151 p. (b) 2220a. (1979));

(viii) Programs involving nutrition, health care or population and family planning services except to the extent designed to include activities directly affecting the environment (such as construction of facilities, water supply systems, waste water treatment, etc.)

(ix) Assistance provided under a Commodity Import Program when, prior to approval, A.I.D. does not have knowledge of the specific commodities to be financed and when the objective in furnishing such assistance requires neither knowledge, at the time the assistance is authorized, nor control, during implementation, of the commodities or their use in the host country.

(x) Support for intermediate credit institutions when the objective is to assist in the capitalization of the institution or part thereof and when such support does not involve reservation of the right to review and approve individual loans made by the institution;

(xi) Programs of maternal or child feeding conducted under Title II of Pub. L. 480;

(xii) Food for development programs conducted by food recipient countries under Title III of Pub. L. 480, when achieving A.I.D.'s objectives in such programs does not require knowledge of or control over the details of the specific activities conducted by the foreign country under such program;

(xiii) Matching, general support and institutional support grants provided to private voluntary organizations (PVOs) to assist in financing programs where A.I.D.'s objective in providing such financing does not require knowledge of or control over the details of the specific activities conducted by the PVO;

(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.); and

(xv) Activities which involve the application of design criteria or standards developed and approved by A.I.D.

(3) The originator of a project. program or activity shall determine the extent to which it is within the classes of actions described in paragraph (c)(2) of this section. This determination shall be made in writing and be submitted with the PID, PAIP or comparable document. This determination, which must include a brief statement supporting application of the exclusion shall be reviewed by the Bureau Environmental Officer in the same manner as a Threshold Decision under §216.3(a)(2) of these procedures. Notwithstanding paragraph (c)(2) of this section, the procedures set forth in §216.3 shall apply to any project, program or activity included in the classes of actions listed in paragraph (c)(2) of this section, or any aspect or component thereof, if at any time in the design, review or approval of the activity it is determined that the project, program or activity, or aspect or component thereof, is subject to the control of A.I.D. and may have a significant effect on the environment.

(d) **Classes of Actions Normally Having a Significant Effect on the Environment.**

(1) The following classes of actions have been determined generally to have a significant effect on the environment and an Environmental Assessment or Environmental Impact Statement, as appropriate, will be required:

(i) Programs of river basin development;

(ii) Irrigation or water management projects, including dams and impoundments;

(iii) Agricultural land leveling;

(iv) Drainage projects;

(v) Large scale agricultural mechanization;

(vi) New lands development;

(vii) Resettlement projects;

(viii) Penetration road building or road improvement projects;

(ix) Powerplants;

(x) Industrial plants;

(xi) Potable water and sewerage projects other than those that are smallscale.

(2) An Initial Environmental Examination normally will not be necessary for activities within the classes described in §216.2(d), except when the originator of the project believes that the project will not have a significant effect on the environment. In such cases, the activity may be subjected to the procedures set forth in §216.3.

(e) **Pesticides.** The exemptions of §216.2(b)(l) and the categorical exclusions of §216.2(c)(2) are not applicable to assistance for the procurement or use of pesticides.

§216.3 Procedures.

(a) **General procedures**

(1) **Preparation of the Initial Environmental Examination**. Except as otherwise provided, an Initial Environmental Examination is not required for activities identified in §216.2(b)(1), (c)(2), and (d). For all other A.I.D. activities described in §216.2(a) an Initial Environmental Examination will be prepared by the originator of an action. Except as indicated in this section, it should be prepared with the PID or PAIP. For projects including the procurement or use of pesticides, the procedures set forth in §216.3(b) will be followed, in addition to the procedures in this paragraph. Activities which cannot be identified in sufficient detail to permit the completion of an Initial Environmental Examination with the PID or PAIP, shall be described by including with the PID or PAIP:

(i) An explanation indicating why the Initial Environmental Examination cannot be completed;

(ii) an estimate of the amount of time required to complete the Initial Environmental Examination; and

(iii) a recommendation that a Threshold Decision be deferred until the Initial Environmental Examination is completed. The responsible Assistant Administrator will act on the request for deferral concurrently with action on the PID or PAIP and will designate a time for completion of the Initial Environmental Examination. In all instances, except as provided in

§216.3(a)(7), this completion date will be in sufficient time to allow for the completion of an Environmental Assessment or Environmental Impact Statement, if required, before a final decision is made to provide A.I.D. funding for the action.

(2) **Threshold Decision**. (i) The Initial Environmental Examination will include a Threshold Decision made by the officer in the originating office who signs the PID or PAIP. If the Initial Environmental Examination is completed prior to or at the same time as the PID or PAIP, the Threshold Decision will be reviewed by the Bureau Environmental Officer concurrently with approval of the PID or PAIP. The Bureau Environmental Officer will either concur in the Threshold Decision or request reconsideration by the officer who made the Threshold Decision, stating the reasons for the request. Differences of opinion between these officers shall be submitted for resolution to the Assistant Administrator at the same time that the PID is submitted for approval.

(ii) An Initial Environmental Examination, completed subsequent to approval of the PID or PAIP, will be forwarded immediately together with the Threshold Determination to the Bureau Environmental Officer for action as described in this section.

(iii) A Positive Threshold Decision shall result from a finding that the proposed action will have a significant effect on the environment. An Environmental Impact Statement shall be prepared if required pursuant to §216.7. If an impact statement is not required, an Environmental Assessment will be prepared in accordance with §216.6. The cognizant Bureau or Office will record a Negative Determination if the proposed action will not have a significant effect on the environment.

(3) **Negative Declaration**. The Assistant Administrator, or the Administrator in actions for which the approval of the Administrator is required for the authorization of financing, may make a Negative Declaration, in writing, that the Agency will not develop an Environmental Assessment or an Environmental Impact Statement regarding an action found to have a significant effect on the environment when (i) a substantial number of Environmental Assessments or Environmental Impact Statements relating to similar activities have been prepared in the past, if relevant to the proposed action, (ii) the Agency has previously prepared a programmatic Statement or Assessment covering the activity in question which has been considered in the development of such activity, or (iii) the Agency has developed design criteria for such an action which, if applied in the design of the action, will avoid a significant effect on the environment.

(4) **Scope of Environmental Assessment or Impact Statement**

(i) **Procedure and Content**. After a Positive Threshold Decision has been made, or a determination is made under the pesticide procedures set forth in §216.3(b) that an Environmental Assessment or

Environmental Impact Statement is required, the originator of the action shall commence 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 or Environmental Impact Statement. The originator of an action within the classes of actions described in §216.2(d) shall commence this scoping process as soon as practicable. Persons having expertise relevant to the environmental aspects of the proposed action shall also participate in this scoping process. (Participants may include but are not limited to representatives of host governments, public and private institutions, the A.I.D. Mission staff and contractors.) This process shall result in a written statement which shall include the following matters:

(a) A determination of the scope and significance of issues to be analyzed in the Environmental Assessment or Impact Statement, including direct and indirect effects of the project on the environment.

(b) Identification and elimination from detailed study of the issues that are not significant or have been covered by earlier environmental review, or approved design considerations, narrowing the discussion of these issues to a brief presentation of why they will not have a significant effect on the environment.

(c) A description of

(1) the timing of the preparation of environmental analyses, including phasing if appropriate,

(2) variations required in the format of the Environmental Assessment, and

(3) the tentative planning and decision-making schedule; and

(d) A description of how the analysis will be conducted and the disciplines that will participate in the analysis.

(ii) These written statements shall be reviewed and approved by the Bureau Environmental Officer.

(iii) **Circulation of Scoping Statement.** To assist in the preparation of an Environmental Assessment, the Bureau Environmental Officer may circulate copies of the written statement, together with a request for written comments, within thirty days, to selected federal agencies if that Officer believes comments by such federal agencies will be useful in the preparation of an Environmental Assessment. Comments received from reviewing federal agencies will be considered in the preparation of the Environmental Assessment and in the formulation of the design and implementation of the project, and will, together with the scoping statement, be included in the project file.

(iv) **Change in Threshold Decision.** If it becomes evident that the action will not have a significant effect on the environment (i.e., will not cause significant harm to the environment), the Positive Threshold Decision may be withdrawn with the concurrence of the Bureau Environmental Officer. In the case of an action included in §216.2(d)(2), the request for withdrawal shall be made to the Bureau Environmental Officer.

(5) **Preparation of Environmental Assessments and Environmental Impact Statement.** If the PID or PAIP is approved, and the Threshold Decision is positive, or the action is included in §216.2(d), the originator of the action will be responsible for the preparation of an Environmental Assessment or Environmental Impact Statement as required. Draft Environmental Impact Statements will be circulated for review and comment as part of the review of Project Papers and as outlined further in §216.7 of those procedures. Except as provided in §216.3(a)(7), final approval of the PP or PAAD and the method of implementation will include consideration of the Environmental Assessment or final Environmental Impact Statement.

(6) **Processing and Review Within A.I.D.**

(i) Initial Environmental Examinations, Environmental Assessments, and final Environmental Impact Statements will be processed pursuant to standard A.I.D. procedures for project approval documents. Except as provided in §216.3(a)(7), Environmental Assessments and final Environmental Impact

Statements will be reviewed as an integral part of the Project Paper or equivalent document. In addition to these procedures, Environmental Assessments will be reviewed and cleared by the Bureau Environmental Officer. They may also be reviewed by the Agency's Environmental Coordinator who will monitor the Environmental Assessment process.

(ii) When project approval authority is delegated to field posts, Environmental Assessments shall be reviewed and cleared by the Bureau Environmental Officer prior to the approval of such actions.

(iii) Draft and final Environmental Impact Statements will be reviewed and cleared by the Environmental Coordinator and the Office of the General Counsel.

(7) **Environmental Review After Authorization of Financing.**

(i) Environmental review may be performed after authorization of a project, program or activity only with respect to subprojects or significant aspects of the project, program or activity that are unidentified at the time of authorization. Environmental review shall be completed prior to authorization for all subprojects and aspects of a project, program or activity that are identified.

(ii) Environmental review should occur at the earliest time in design or implementation at which a meaningful review can be undertaken, but in no event later than when previously unidentified subprojects or aspects of projects, programs or activities are identified and planned. To the extent possible, adequate information to undertake deferred environmental review should be obtained before funds are obligated for unidentified subprojects or aspects of projects, programs or activities. (Funds may be obligated for the other aspects for which environmental review has been completed.) To avoid an irreversible commitment of resources prior to the conclusion of environmental review, the obligation of funds can be made incrementally as subprojects or aspects of projects, programs or activities are identified; or if necessary while planning continues, including environmental review, the agreement or other document obligating funds may contain appropriate covenants or conditions precedent to disbursement for unidentified subprojects or aspects of projects, programs or activities.

(iii) When environmental review must be deferred beyond the time some of the funds are to be disbursed (e.g., long lead times for the delivery of goods or services), the project agreement or other document obligating funds shall contain a covenant or covenants requiring environmental review, including an Environmental Assessment or Environmental Impact Statement, when appropriate, to be completed and taken into account prior to implementation of those subprojects or aspects of the project, program or activity for which environmental review is deferred. Such covenants shall ensure that implementation plans will be modified in accordance with environmental review if the parties decide that modifications are necessary.

(iv) When environmental review will not be completed for an entire project, program or activity prior to authorization, the Initial Environmental Examination and Threshold Decision required under §216.3(a)(l) and (2) shall identify those aspects of the project, program or activity for which environmental review will be completed prior to the time financing is authorized. It shall also include those subprojects or aspects for which environmental review will be deferred, stating the reasons for deferral and the time when environmental review will be completed. Further, it shall state how an irreversible commitment of funds will be avoided until environmental review is completed. The A.I.D. officer responsible for making environmental decisions for such projects, programs or activities shall also be identified (the same officer who has decision-making authority for the other aspects of implementation). This deferral shall be reviewed and approved by the officer making the Threshold Decision and the officer who authorizes the project, program or activity. Such approval may be made only after consultation with the Office of General Counsel for the purpose of establishing the manner in which conditions precedent to disbursement or covenants in project and other agreements will avoid an irreversible commitment of resources before environmental review is completed.

(8) **Monitoring.** To the extent feasible and relevant, projects and programs for which Environmental Impact Statements or Environmental Assessments have been prepared should be designed to include measurement of any changes in environmental quality, positive or negative, during their implementation. This will require recording of baseline data at the start. To the extent that available data permit,

originating offices of A.I.D. will formulate systems in collaboration with recipient nations, to monitor such impacts during the life of A.I.D.'s involvement. Monitoring implementation of projects, programs and activities shall take into account environmental impacts to the same extent as other aspects of such projects, programs and activities. If during implementation of any project, program or activity, whether or not an Environmental Assessment or Environmental Impact Statement was originally required, it appears to the Mission Director, or officer responsible for the project, program or activity, that it is having or will have a significant effect on the environment that was not previously studied in an Environmental Assessment or Environmental Impact Statement, the procedures contained in this part shall be followed including, as appropriate, a Threshold Decision, Scoping and an Environmental Assessment or Environmental Impact Statement.

(9) **Revisions.** If, after a Threshold Decision is made resulting in a Negative Determination, a project is revised or new information becomes available which indicates that a proposed action might be "major" and its effects "significant", the Negative Determination will be reviewed and revised by the cognizant Bureau and an Environmental Assessment or Environmental Impact Statement will be prepared, if appropriate. Environmental Assessments and Environmental Impact Statements will be amended and processed appropriately if there are major changes in the project or program, or if significant new information becomes available which relates to the impact of the project, program or activity on the environment that was not considered at the time the Environmental Assessment or Environmental Impact Statement was approved. When ongoing programs are revised to incorporate a change in scope or nature, a determination will be made as to whether such change may have an environmental impact not previously assessed. If so, the procedures outlined in this part will be followed.

(10) **Other Approval Documents**. These procedures refer to certain A.I.D. documents such as PIDs, PAIPs, PPs and PAADs as the A.I.D. internal instruments for approval of projects, programs or activities. From time to time, certain special procedures, such as those in §216.4, may not require the use of the aforementioned documents. In these situations, these environmental procedures shall apply to those special approval procedures, unless otherwise exempt, at approval times and levels comparable to projects, programs and activities in which the aforementioned documents are used.

(b) **Pesticide Procedures**

(1) **Project Assistance**. Except as provided in §216.3 (b)(2), all proposed projects involving assistance for the procurement or use, or both, of pesticides shall be subject to the procedures prescribed in §216.3(b)(l)(i) through (v). These procedures shall also apply, to the extent permitted by agreements entered into by A.I.D. before the effective date of these pesticide procedures, to such projects that have been authorized but for which pesticides have not been procured as of the effective date of these pesticide procedures.

(i) When a project includes assistance for procurement or use, or both, of pesticides registered for the same or similar uses by USEPA without restriction, the Initial Environmental Examination for the project shall include a separate section evaluating the economic, social and environmental risks and benefits of the planned pesticide use to determine whether the use may result in significant environmental impact. Factors to be considered in such an evaluation shall include, but not be limited to the following:

(a) The USEPA registration status of the requested pesticide;

(b) The basis for selection of the requested pesticide;

(c) The extent to which the proposed pesticide use is part of an integrated pest management program;

(d) The proposed method or methods of application, including availability of appropriate application and safety equipment;

(e) Any acute and longterm toxicological hazards, either human or environmental, associated with the proposed use and measures available to minimize such hazards;

(f) The effectiveness of the requested pesticide for the proposed use;

(g) Compatibility of the proposed pesticide with target and nontarget ecosystems;

(h) The conditions under which the pesticide is to be used, including climate, flora, fauna, geography, hydrology, and soils;

(i) The availability and effectiveness of other pesticides or nonchemical control methods;

(j) The requesting country's ability to regulate or control the distribution, storage, use and disposal of the requested pesticide;

(k) The provisions made for training of users and applicators; and

(l) The provisions made for monitoring the use and effectiveness of the pesticide.

In those cases where the evaluation of the proposed pesticide use in the Initial Environmental Examination indicates that the use will significantly effect the human environment, the Threshold Decision will include a recommendation for the preparation of an Environmental Assessment or Environmental Impact Statement, as appropriate. In the event a decision is made to approve the planned pesticide use, the Project Paper shall include to the extent practicable, provisions designed to mitigate potential adverse effects of the pesticide. When the pesticide evaluation section of the Initial Environmental Examination does not indicate a potentially unreasonable risk arising from the pesticide use, an Environmental Assessment or Environmental Impact Statement shall nevertheless be prepared if the environmental effects of the project otherwise require further assessment.

(ii) When a project includes assistance for the procurement or use, or both, of any pesticide registered for the same or similar uses in the United States but the proposed use is restricted by the USEPA on the basis of user hazard, the procedures set forth in §216.3(b)(1)(i) above will be followed. In addition, the Initial Environmental Examination will include an evaluation of the user hazards associated with the proposed USEPA restricted uses to ensure that the implementation plan which is contained in the Project Paper incorporates provisions for making the recipient government aware of these risks and providing, if necessary, such technical assistance as may be required to mitigate these risks. If the proposed pesticide use is also restricted on a basis other than user hazard, the procedures in §216.3(b)(l)(iii) shall be followed in lieu of the procedures in this section.

(iii) If the project includes assistance for the procurement or use, or both of:

(a) Any pesticide other than one registered for the same or similar uses by USEPA without restriction or for restricted use on the basis of user hazard; or

(b) Any pesticide for which a notice of rebuttable presumption against reregistration, notice of intent to cancel, or notice of intent to suspend has been issued by USEPA,

The Threshold Decision will provide for the preparation of an Environmental Assessment or Environmental Impact Statement, as appropriate (§216.6(a)). The EA or EIS shall include, but not be limited to, an analysis of the factors identified in

§216.3(b)(l)(i) above.

(iv) Notwithstanding the provisions of §216.3(b)(l)(i) through (iii) above, if the project includes assistance for the procurement or use, or both, of a pesticide against which USEPA has initiated a regulatory action for cause, or for which it has issued a notice of rebuttable presumption against reregistration, the nature of the action or notice, including the relevant technical and scientific factors will be discussed with the requesting government and considered in the IEE and, if prepared, in the EA or EIS. If USEPA initiates any of the regulatory actions above against a pesticide subsequent to its evaluation in an IEE, EA or EIS, the nature of the action will be discussed with the recipient government and considered in an amended IEE or amended EA or EIS, as appropriate.

(v) If the project includes assistance for the procurement or use, or both of pesticides but the specific pesticides to be procured or used cannot be identified at the time the IEE is prepared, the procedures outlined in §216.3(b)(i) through (iv) will be followed when the specific pesticides are identified and before procurement or use is authorized. Where identification of the pesticides to be procured or used does not occur until after Project Paper approval, neither the procurement nor the use of the pesticides shall be undertaken unless approved, in writing, by the Assistant Administrator (or in the case of projects authorized at the Mission level, the Mission Director) who approved the Project Paper.

(2) **Exceptions to Pesticide Procedures**. The procedures set forth in §216.3 (b)(l) shall not apply to the following projects including assistance for the procurement or use, or both, of pesticides.

(i) Projects under emergency conditions.

Emergency conditions shall be deemed to exist when it is determined by the Administrator, A.I.D.. in writing that:

(a) A pest outbreak has occurred or is imminent; and

(b) Significant health problems (either human or animal) or significant economic problems will occur without the prompt use of the proposed pesticide; and

(c) Insufficient time is available before the pesticide must be used to evaluate the proposed use in accordance with the provisions of this regulation.

(ii) Projects where A.I.D. is a minor donor, as defined in

§216.1(c)(12) above, to a multidonor project.

(iii) Projects including assistance for procurement or use, or both, of pesticides for research or limited field evaluation purposes by or under the supervision of project personnel. In such instances, however, A.I.D. will ensure that the manufacturers of the pesticides provide toxicological and environmental data necessary to safeguard the health of research personnel and the quality of the local environment in which the pesticides will be used. Furthermore, treated crops will not be used for human or animal consumption unless appropriate tolerances have been established by EPA or recommended by FAO/WHO, and the rates and frequency of application, together with the prescribed preharvest intervals, do not result in residues exceeding such tolerances. This prohibition does not apply to the feeding of such crops to animals for research purposes.

(3) **Non-Project Assistance**. In a very few limited number of circumstances A.I.D. may provide nonproject assistance for the procurement and use of pesticides. Assistance in such cases shall be provided if the A.I.D. Administrator determines in writing that

(i) emergency conditions, as defined in §216.3(b)(2)(i) above exist; or

(ii) that compelling circumstances exist such that failure to provide the proposed assistance would seriously impede the attainment of U.S. foreign policy objectives or the objectives of the foreign assistance program. In the latter case, a decision to provide the assistance will be based to the maximum extent practicable, upon a consideration of the factors set forth in §216.3(b)(l)(i) and, to the extent available, the history of efficacy and safety covering the past use of the pesticide the in recipient country.

§216.4 Private applicants.

Programs, projects or activities for which financing from A.I.D. is sought by private applicants, such as PVOs and educational and research institutions, are subject to these procedures. Except as provided in §216.2(b), (c) or (d), preliminary proposals for financing submitted by private applicants shall be accompanied by an Initial Environmental Examination or adequate information to permit preparation of

an Initial Environmental Examination. The Threshold Decision shall be made by the Mission Director for the country to which the proposal relates, if the preliminary proposal is submitted to the A.I.D. Mission, or shall be made by the officer in A.I.D. who approves the preliminary proposal. In either case, the concurrence of the Bureau Environmental Officer is required in the same manner as in §216.3(a)(2), except for PVO projects approved in A.I.D. Missions with total life of project costs less than $500,000. Thereafter, the same procedures set forth in §216.3 including as appropriate scoping and Environmental Assessments or Environmental Impact Statements, shall be applicable to programs, projects or activities submitted by private applicants. The final proposal submitted for financing shall be treated, for purposes of these procedures, as a Project Paper. The Bureau Environmental Officer shall advise private applicants of studies or other information foreseeably required for action by A.I.D.

§216.5 Endangered species.

It is A.I.D. policy to conduct its assistance programs in a manner that is sensitive to the protection of endangered or threatened species and their critical habitats. The Initial Environmental Examination for each project, program or activity having an effect on the environment shall specifically determine whether the project, program or activity will have an effect on an endangered or threatened species, or critical habitat. If the proposed project, program or activity will have the effect of jeopardizing an endangered or threatened species or of adversely modifying its critical habitat, the Threshold Decision shall be a Positive Determination and an Environmental Assessment or Environmental Impact Statement completed as appropriate, which shall discuss alternatives or modifications to avoid or mitigate such impact on the species or its habitat.

§216.6 Environmental assessments.

(a) **General Purpose**. The purpose of the Environmental Assessment is to provide Agency and host country decision-makers with a full discussion of significant environmental effects of a proposed action. It includes alternatives which would avoid or minimize adverse effects or enhance the quality of the environment so that the expected benefits of development objectives can be weighed against any adverse impacts upon the human environment or any irreversible or irretrievable commitment of resources.

(b) **Collaboration with Affected Nation on Preparation**. Collaboration in obtaining data, conducting analyses and considering alternatives will help build an awareness of development associated environmental problems in less developed countries as well as assist in building an indigenous institutional capability to deal nationally with such problems. Missions, Bureaus and Offices will collaborate with affected countries to the maximum extent possible, in the development of any Environmental Assessments and consideration of environmental consequences as set forth therein.

(c) **Content and Form**. The Environmental Assessment shall be based upon the scoping statement and shall address the following elements, as appropriate:

(1) **Summary**. The summary shall stress the major conclusions, areas of controversy, if any, and the issues to be resolved.

(2) **Purpose**. The Environmental Assessment shall briefly specify the underlying purpose and need to which the Agency is responding in proposing the alternatives including the proposed action.

(3) **Alternatives Including the Proposed Action**. This section 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.

(4) **Affected Environment**. The Environmental Assessment shall succinctly describe the environment of

the area(s) to be affected or created by the alternatives under consideration. The descriptions shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in the Environmental Assessment shall be commensurate with the significance of the impact with less important material summarized, consolidated or simply referenced.

(5) **Environmental Consequences**. This section forms the analytic basis for the comparisons under paragraph (c)(3) of this section. It will include the environmental impacts of the alternatives including the proposed action; any adverse effects that cannot be avoided should the proposed action be implemented; the relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity; and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented. It should not duplicate discussions in paragraph (c)(3) of this section. This section of the Environmental Assessment should include discussions of direct effects and their significance; indirect effects and their significance; possible conflicts between the proposed action and land use plans, policies and controls for the areas concerned; energy requirements and conservation potential of various alternatives and mitigation measures; natural or depletable resource requirements and conservation potential of various requirements and mitigation measures; urban quality; historic and cultural resources and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures; and means to mitigate adverse environmental impacts.

(6) **List of Preparers**. The Environmental Assessment shall list the names and qualifications (expertise, experience, professional discipline) of the persons primarily responsible for preparing the Environmental Assessment or significant background papers.

(7) **Appendix**. An appendix may be prepared.

(d) **Program Assessment**. Program Assessments may be appropriate in order to assess the environmental effects of a number of individual actions and their cumulative environmental impact in a given country or geographic area, or the environmental impacts that are generic or common to a class of agency actions, or other activities which are not country-specific. In these cases, a single, programmatic assessment will be prepared in A.I.D./Washington and circulated to appropriate overseas Missions, host governments, and to interested parties within the United States. To the extent practicable, the form and content of the programmatic Environmental Assessment will be the same as for project Assessments. Subsequent Environmental Assessments on major individual actions will only be necessary where such follow-on or subsequent activities may have significant environmental impacts on specific countries where such impacts have not been adequately evaluated in the programmatic Environmental Assessment. Other programmatic evaluations of class of actions may be conducted in an effort to establish additional categorical exclusions or design standards or criteria for such classes that will eliminate or minimize adverse effects of such actions, enhance the environmental effect of such actions or reduce the amount of paperwork or time involved in these procedures. Programmatic evaluations conducted for the purpose of establishing additional categorical exclusions under §216.2(c) or design considerations that will eliminate significant effects for classes of actions shall be made available for public comment before the categorical exclusions or design standards or criteria are adopted by A.I.D. Notice of the availability of such documents shall be published in the *Federal Register*. Additional categorical exclusions shall be adopted by A.I.D. upon the approval of the Administrator, and design consideration in accordance with usual agency procedures.

(e) **Consultation and Review**.

(1) When Environmental Assessments are prepared on activities carried out within or focused on specific developing countries, consultation will be held between A.I.D. staff and the host government both in the early stages of preparation and on the results and significance of the completed Assessment before the project is authorized.

(2) Missions will encourage the host government to make the Environmental Assessment available to the general public of the recipient country. If Environmental Assessments are prepared on activities which are not country specific, the Assessment will be circulated by the Environmental Coordinator to A.I.D.'s Overseas Missions and interested governments for information, guidance and comment and will

be made available in the U.S. to interested parties.

(f) **Effect in Other Countries.** In a situation where an analysis indicates that potential effects may extend beyond the national boundaries of a recipient country and adjacent foreign nations may be affected, A.I.D. will urge the recipient country to consult with such countries in advance of project approval and to negotiate mutually acceptable accommodations.

(g) **Classified Material.** Environmental Assessments will not normally include classified or administratively controlled material. However, there may be situations where environmental aspects cannot be adequately discussed without the inclusion of such material. The handling and disclosure of classified or administratively controlled material shall be governed by

22 CFR Part 9. Those portions of an Environmental Assessment which are not classified or administratively controlled will be made available to persons outside the Agency as provided for in 22 CFR Part 212.

§216.7 Environmental impact statements.

(a) **Applicability.** An Environmental Impact Statement shall be prepared when agency actions significantly affect:

(1) The global environment or areas outside the jurisdiction of any nation (e.g., the oceans);

(2) The environment of the United States; or

(3) Other aspects of the environment at the discretion of the Administrator.

(b) **Effects on the United States: Content and Form.** An Environmental Impact Statement relating to paragraph (a)(2) of this section shall comply with the CEQ Regulations. With respect to effects on the United States, the terms environment and significant effect wherever used in these procedures have the same meaning as in the CEQ Regulations rather than as defined in §216.1(c)(12) and (13) of these procedures.

(c) **Other Effects: Content and Form.** An Environmental Impact Statement relating to paragraphs (a)(1) and (a)(3) of this section will generally follow the CEQ Regulations, but will take into account the special considerations and concerns of A.I.D. Circulation of such Environmental Impact Statements in draft form will precede approval of a Project Paper or equivalent and comments from such circulation will be considered before final project authorization as outlined in §216.3 of these procedures. The draft Environmental Impact Statement will also be circulated by the Missions to affected foreign governments for information and comment. Draft Environmental Impact Statements generally will be made available for comment to Federal agencies with jurisdiction by law or special expertise with respect to any environmental impact involved, and to public and private organizations and individuals for not less than fortyfive (45) days. Notice of availability of the draft Environmental Impact Statements will be published in the FEDERAL REGISTER. Cognizant Bureaus and Offices will submit these drafts for circulation through the Environmental Coordinator who will have the responsibility for coordinating all such communications with persons outside A.I.D. Any comments received by the Environmental Coordinator will be forwarded to the originating Bureau or Office for consideration in final policy decisions and the preparation of a final Environmental Impact Statement. All such comments will be attached to the final Statement, and those relevant comments not adequately discussed in the draft Environmental Impact Statement will be appropriately dealt with in the final Environmental Impact Statement. Copies of the final Environmental Impact Statement, with comments attached, will be sent by the Environmental Coordinator to CEQ and to all other Federal, state, and local agencies and private organizations that made substantive comments on the draft, including affected foreign governments. Where emergency circumstances or considerations of foreign policy make it necessary to take an action without observing the provisions of §1506.10 of the CEQ Regulations, or when there are overriding considerations of expense to the United States or foreign governments, the originating Office will advise the Environmental Coordinator who will consult with Department of State and CEQ concerning

appropriate modification of review procedures.

§216.8 Public hearings.

(a) In most instances AID will be able to gain the benefit of public participation in the impact statement process through circulation of draft statements and notice of public availability in CEQ publications. However, in some cases the Administrator may wish to hold public hearings on draft Environmental Impact Statements. In deciding whether or not a public hearing is appropriate, Bureaus in conjunction with the Environmental Coordinator should consider:

(1) The magnitude of the proposal in terms of economic costs, the geographic area involved, and the uniqueness or size of commitment of the resources involved;

(2) The degree of interest in the proposal as evidenced by requests from the public and from Federal, state and local authorities, and private organizations and individuals, that a hearing be held;

(3) The complexity of the issue and likelihood that information will be presented at the hearing which will be of assistance to the Agency; and

(4) The extent to which public involvement already has been achieved through other means, such as earlier public hearings, meetings with citizen representatives, and/or written comments on the proposed action.

(b) If public hearings are held, draft Environmental Impact Statements to be discussed should be made available to the public at least fifteen (15) days prior to the time of the public hearings, and a notice will be placed in the FEDERAL REGISTER giving the subject, time and place of the proposed hearings.

§216.9 Bilateral and multilateral studies and concise reviews of environmental issues.

Notwithstanding anything to the contrary in these procedures, the Administrator may approve the use of either of the following documents as a substitute for an Environmental Assessment (but not a substitute for an Environmental Impact Statement) required under these procedures:

(a) Bilateral or multilateral environmental studies, relevant or related to the proposed action, prepared by the United States and one or more foreign countries or by an international body or organization in which the United States is a member or participant; or

(b) Concise reviews of the environmental issues involved including summary environmental analyses or other appropriate documents.

§216.10 Records and reports.

Each Agency Bureau will maintain a current list of activities for which Environmental Assessments and Environmental Impact Statements are being prepared and for which Negative Determinations and Declarations have been made. Copies of final Initial Environmental Examinations, scoping statements, Assessments and Impact Statements will be available to interested Federal agencies upon request. The cognizant Bureau will maintain a permanent file (which may be part of its normal project files) of Environmental Impact Statements, Environmental Assessments, final Initial Environmental Examinations, scoping statements, Determinations and Declarations which will be available to the public under the Freedom of Information Act. Interested persons can obtain information or status reports regarding Environmental Assessments and Environmental Impact Statements through the A.I.D. Environmental Coordinator.

(22 U.S.C. 2381; 42 U.S.C. 4332)

Dated October 9, 1980

Joseph C. Wheeler

Acting Administrator

BACK TO TOP

70

P.36 in ADS download

201.3.4.11 Technical Analysis for Strategic Plans

b. Requirements

The following mandatory technical analysis requirements apply to development of Strategic Plans:

- **Environmental Analysis:** The following is required by Sections 118(e) and 119(d) of the Foreign Assistance Act and cannot be waived. All country level Operating Unit Strategic Plans must include a summary of their analyses of the following issues: (1) the actions necessary to conserve biological diversity, and (2) the extent to which the actions proposed meet the needs thus identified. For country level Strategic Plans that cover countries that have any part of their territory within the tropics, each Strategic Plan shall also include (1) a summary of their analyses of the actions necessary to achieve conservation and sustainable management of tropical forests and (2) the extent to which the actions proposed meet the needs thus identified. **(See Mandatory Reference, FAA sections 118(e) and 119(d); see also special exemption below for regional and global programs)**

  While not required, given the interrelated character of environmental issues, an Operating Unit can save time and be more efficient by including all aspects of environment when undertaking the mandatory biodiversity and tropical forestry work. **(See 201.3.6.3 paragraph b, Environmental Review)** New

Special Exemptions and Waivers:
Conflict prevention and FAA section 118e and 119d environmental analyses are not mandatory for global or regional strategies that cover multiple countries (though in many cases they may be desirable).
Except for the biodiversity and tropical forestry section, these requirements may be modified or eliminated by a formal parameter setting message approved by the AA of the responsible Bureau. **(See 201.3.3.5)**

201.3.6.3 Pre-Obligation Requirements

New

P.66

- Since USAID-program funded activities involve transfer of U.S. taxpayer resources to other governments and organizations, the process of developing and approving activities is very regulated and at times complex. This section summarizes the major legal and policy requirements that must be met before USAID-appropriated funds are

obligated. It is important that these requirements be adequately documented.

b. Environmental Review. An Initial Environmental Examination (IEE), Request for Categorical Exclusion (CE), Environmental Assessment (EA), or other appropriate action under the USAID Environmental Procedure must be completed for the program, activity, or substantive amendment and approved by the relevant Bureau Environmental Officer prior to obligation of funds. **(See Mandatory Reference, 22, CFR 216 and see ADS 204.)**

Adequate review of environmental considerations normally requires a relatively detailed description and analysis of planned interventions; recommended, mitigative measures; and local public participation in the review process. If Operating Units do not allocate resources and define such details at the pre-obligation planning stage, they must, at minimum, ensure proper environmental review prior to disbursement and be prepared to modify activities if necessary, in accordance with the USAID Environmental Procedure.

New

Biosafety. If an activity will potentially involve the use of genetically modified organisms in research, field trials, or dissemination, the activity must be reviewed and approved for compliance with applicable U.S. requirements by the Agency Biosafety Officer in Washington prior to obligation of funds and prior to the transfer, testing, or release of biotechnology products into the environment. This review and approval is limited to the safety aspects of the proposed activity and may involve external peer review or demonstration of comparable safety oversight by other expert U.S. federal agencies. Therefore, adequate time should be budgeted for this approval process. This biosafety determination is separate from, and precedes and informs, the 22 CFR 216 environmental impact assessment determination. Since it precedes the 22 CFR 216 process, Operating Units and Strategic Objective Teams are responsible for budgeting adequate time in the design process for this review. It is difficult to predict the amount of time needed, since reviews are highly dependent on the amount of analysis and information provided, whether other expert Federal Agency biosafety reviews have been completed, and whether additional information will be required, and whether external peer reviews will be undertaken. Therefore, it is important for an Operating Unit or SO Team to contact USAID/Washington as early in a design process as possible to ensure timely handling.

Biosafety review can not be waived or delegated to the field.

Additional ADS guidance on compliance with this requirement is in development and will be posted as it becomes available. Until this occurs, please consult directly with Agency biosafety staff who are based in G in

the Center for Population, Health and Nutrition (G/PHN) and in the Center for Economic Growth and Agricultural Development, Office of Agriculture and Food Security (G/EGAD/AFS) or the Agency Environmental Coordinator if there is a potential for the use of genetically modified organisms.

Major Functional Series 200: USAID PROGRAM ASSISTANCE
ADS 204 Environmental Procedures

* This chapter provides policy and essential procedures about how to apply 22 CFR 216 to the new USAID assistance process in order to ensure that assessments of the environmental consequences of all programs, activities, and substantive amendments thereto, are in full accordance with the requirements of Title 22 of the Code of Federal Regulations, Part 216. (See Mandatory Reference 22 CFR 216)

204.1 Authority
204.2 Objective
204.3 Responsibility
204.4 Definitions (See Glossary)
204.5 POLICY
204.5.1 MANDATORY COMPLIANCE WITH 22 CFR 216
E204.5.1 Mandatory Compliance with 22 CFR 216 - N/A
204.5.2 OPERATIONAL BUREAUS
E204.5.2 Operational Bureaus - N/A
204.5.3 OPERATING UNIT
E204.5.3 Operating Unit - N/A
204.5.4 STRATEGIC OBJECTIVE, STRATEGIC SUPPORT OBJECTIVE AND SPECIAL OBJECTIVE TEAMS (SO TEAMS)
E204.5.4 Strategic Objective, Strategic Support Objective and Special Objective Teams (SO TEAMS)
204.5.5 MISSION ENVIRONMENTAL OFFICER (MEO) AND REGIONAL ENVIRONMENTAL OFFICER (REO)
E204.5.5 Mission Environmental Officer (MEO) and Regional Environmental Officer (REO) - N/A
204.5.6 BUREAU ENVIRONMENTAL OFFICER (BEO)
204.5.6 Bureau Environmental Officer (BEO) - N/A
204.5.7 AGENCY ENVIRONMENTAL COORDINATOR (AEC)
E204.5.7 Agency Environmental Coordinator (AEC) - N/A
204.5.8 DECISION-MAKING AUTHORITY
E204.5.8 Decision-Making Authority - N/A
*204.6 Supplementary Reference - N/A

Major Functional Series 200: USAID Program Assistance
ADS 204 ENVIRONMENTAL PROCEDURES

1. Section 117 of the Foreign Assistance Act of 1961, as amended.
2. National Environmental Policy Act, 42 USC 4371, et seq.
3. Executive Order 12114 dated January 4, 1979, regarding environmental review of Federal agency actions outside the United States.
4. Title 22 of the Code of Federal Regulations, Part 216 dated October 9, 1980, codifies USAID's environmental procedures (cited as 22 CFR 216).

204.2 Objective

Environmental sustainability is integral to USAID's overall goal. To meet this goal environmental considerations shall be incorporated into results planning, achieving, and monitoring. This Chapter defines what USAID and its operating units will do to integrate environmental issues into its programs to meet USG environmental requirements.

204.3 Responsibility

* 1. Operational Bureaus
Operational Bureaus are responsible for overseeing and supporting their Operating Units to ensure that environmental review in accordance with 22 CFR 216 is fully integrated into the decision-making process, including planning and approval of all programs and activities needed to implement the Bureau and its Operating Units' Strategic Plan. **(See Mandatory Reference 22 CFR 216)**

2. Operating Units
Operating Units are responsible for allocating adequate staff and financial resources to their Teams to effectively implement the Agency's environmental procedures. Operating Units also hold their Strategic Objective Teams accountable for meeting these requirements and continuously monitoring their results.

3. Strategic Objective, Strategic Support Objective, or Special Objective Teams (SO Teams)
SO Teams are responsible for ensuring full compliance with 22 CFR 216, the Agency's environmental procedures. This includes designing, monitoring, and modifying all programs, results packages, and activities to ensure that the environmental consequences of all actions taken by USAID are considered and that appropriate environmental safeguards are adopted. The SO Team is also responsible for keeping their relevant Bureau Environmental Officer informed on upcoming 22 CFR 216 actions through informal contacts and the R4; and for ensuring that all of its 22 CFR 216 environmental reviews are accomplished in a timely fashion so as not to unnecessarily delay implementation of any activities.

4. Mission Environmental Officer and Regional Environmental Officer (MEO and REO)
MEOs and REOs are responsible for advising SO Teams on how best to comply with 22 CFR 216 requirements, how SO Teams can effectively monitor implementation of approved mitigative measures, and how SO Teams can obtain additional environmental expertise to assist them. MEOs and REOs also liaise with their relevant Bureau Environmental Officers on 22 CFR 216 issues affecting SO Teams in their Operating Units.

5. Bureau Environmental Officer (BEO)
BEOs are responsible for overseeing the effective implementation of 22 CFR 216 throughout all Operating Units in their Bureau through timely decision making and adherence to consistent and strong environmental principles that lead to environmentally sound development.

6. Agency Environmental Coordinator (AEC)
The AEC is responsible for overseeing the effective implementation of 22 CFR 216 throughout the Agency. This includes monitoring its implementation, resolving disputes, advising in selection of BEOs, and liaising with the President's Council on Environmental Quality and the public.

204.4 Definitions (See Glossary)

ACTIVITY
CEQ REGULATIONS
ENVIRONMENT
ENVIRONMENTAL ASSESSMENT
ENVIRONMENTAL IMPACT STATEMENT
ESSENTIAL PROCEDURE
INITIAL ENVIRONMENTAL EXAMINATION
MINOR DONOR
OPERATING UNIT
PROGRAM ASSISTANCE APPROVAL DOCUMENT (PAAD)
PROGRAM ASSISTANCE INITIAL PROPOSAL (PAIP)
PROJECT IDENTIFICATION DOCUMENT (PID)

PROJECT PAPER (PP)
RESULTS PACKAGE
RESULTS REVIEW AND RESOURCES REQUEST (R4)
SIGNIFICANT EFFECT
SPECIAL OBJECTIVE
STRATEGIC OBJECTIVE
STRATEGIC OBJECTIVE TEAM
STRATEGIC PLAN
STRATEGIC SUPPORT OBJECTIVE
THRESHOLD DECISION

Acronyms used in this chapter are:

22 CFR 216 - Title 22 of the Code of Federal Regulations, Part 216. These are USAID's environmental procedures and are sometimes referred to colloquially as Reg 16.

AEC - Agency Environmental Coordinator
BEO - Bureau Environmental Officer
EA - Environmental Assessment
EIS - Environmental Impact Statement
IEE - Initial Environmental Examination
MEO - Mission Environmental Officer
REO - Regional Environmental Officer
SO - Strategic Objective/Strategic Support Objective/Special Objective
SO Team - The team managing an SO. See the ADS glossary for further detail.

204.5 POLICY

The following are the official Agency policies and corresponding essential procedures:

204.5.1 MANDATORY COMPLIANCE WITH 22 CFR 216

* The environmental procedures are codified in a Federal regulation. USAID must and shall fully comply with 22 CFR 216, except to the extent some of its terms are not used in the new operations assistance processes (i.e. PID, PP, etc.). In those cases the terms used in this chapter of the ADS (which are intended to be as parallel as possible to the original terms) are used instead. However, 22 CFR 216 is controlling in the event of a conflict between this chapter and 22 CFR 216. If there are questions, consult your BEO, the AEC, or Agency legal counsel. (See Mandatory Reference 22 CFR 216)

E204.5.1 Mandatory Compliance with 22 CFR 216 - N/A

204.5.2 OPERATIONAL BUREAUS

Incorporated into their normal Results Review and Resources Request (R4) process each operational Bureau shall review and approve, with the guidance of their Bureau Environmental Officer, the R4 environmental section described below in 204.5.3

Bureaus shall provide each Operating Unit the resources necessary to complete environmental reviews for programs and activities in the Strategic Plan or any modification of it.

E204.5.2 Operational Bureaus - N/A

204.5.3 OPERATING UNIT

Each USAID Operating Unit shall prepare and submit an environmental section as an integral part of their R4. This section will consist of two parts:

- the first part will include a discussion of any issues that the Operating Unit may wish to raise with respect to implementation of mitigation measures, monitoring provisions or other implementation requirements agreed to pursuant to 22 CFR 216 during activity design; and,

* - the second part will be an illustrative schedule of upcoming activities that may require 22 CFR 216 review. While this schedule will necessarily be notional due to the desired flexibility in allowing teams to revise and develop new activities, it will allow the BEO to better plan for work loads in order to have shorter turn around times on reviews and approvals of 22 CFR 216 documents. The schedule will also serve the operating unit as a planning document for budgeting its time and money resources to ensure that all 22 CFR 216 requirements are met in a timely way and will not become an impediment to speedy action. **(See Mandatory Reference 22 CFR 216)**

Operating Units shall take necessary steps to ensure that each SO Team integrates timely and effective environmental review in the decision-making process for programs and activities and that sufficient money and staff are allocated to the SO Teams to accomplish the work.

Operating Units shall also take necessary steps to ensure that no irreversible commitments of resources for programs or activities are made by any of its Teams before environmental review is completed and its findings considered for the program or activity.

Operating Units shall undertake the required environmental planning analyses for its strategic plan as outlined in chapter 201.5.10g.

E204.5.3 Operating Unit - N/A

204.5.4 STRATEGIC OBJECTIVE, STRATEGIC SUPPORT OBJECTIVE AND SPECIAL OBJECTIVE TEAMS (SO TEAMS)

* Each SO Team shall actively plan how it will comply with 22 CFR 216 requirements for each activity it undertakes, actively monitor ongoing activities for compliance with approved IEE, EA, or EIS recommendations or mitigative measures; and modify or end activities that are not in compliance. When an SO Team chooses to create Results Package (RP) Teams, it may delegate the implementation of these responsibilities to them. In these cases the SO Team is responsible for ensuring that the RP Teams have adequate time, staff, authority, and money to implement these responsibilities.**(See Mandatory Reference 22 CFR 216)**

E204.5.4 Strategic Objective, Strategic Support Objective and Special Objective Teams (SO TEAMS) Operating Unit and SO Team Procedures

Each Operating Unit and SO Team shall develop effective essential procedures to:

* - ensure that adequate time and resources are available to complete all environmental work required under 22 CFR 216 before funds are obligated (this environmental work includes IEEs, Categorical Exclusions, requests for deferrals or exemptions of environmental reviews and if appropriate, Scoping Statements and their related EAs or EISs) **(See Mandatory Reference 22 CFR 216)**. More specifically these environmental reviews include;

- completing an IEE or justification for a Categorical Exclusion or Exemption, in accordance 22 CFR 216, for each program or activity at the earliest time in the planning and design process when sufficient information is known about the program or activity to permit a meaningful environmental threshold determination; it is essential that this review be done as early as possible in the design process in order to allow adequate time for more detailed subsequent environmental review and concurrence, as well as integrating environmental

mitigations into the design process, should this be required;

- completing Scoping Statements and EAs or EISs (if required) at the earliest time in the design process when sufficient information is known or being developed to undertake these analyses;

- forwarding each environmental document to the BEO for review and concurrence, allowing a reasonable amount of time for this process;

- providing reasonable notification to the affected public and, as feasible, encouraging public participation, review and comment on Scoping Statements and their related EAs or EISs. Public is defined for EAs to include directly affected people in the host country, host country governments. It is USAID's policy that interested U.S. parties should also be involved when they show an interest. For EISs including the U.S. public is a regulatory requirement.

- considering the content and findings of environmental documents in the design and approval of each program and activity before an irreversible commitment of resources is made for the program or activity;

- incorporating environmental features and mitigative measures identified in IEEs, EAs, and EISs, as appropriate, in the final design and implementation of programs or activities.

- Actively monitor and evaluate whether the environmental features designed for the activity resulting from the 22 CFR 216 process are being implemented effectively and whether there are new or unforeseen environmental consequences arising during implementation that were not identified and reviewed in accordance with 22 CFR 216.

- Based on the above described monitoring and evaluation initiate, modify or end activities as appropriate.

- Provide the Operating Unit with any issues on environmental compliance and a schedule for any activities which must be reviewed under 22 CFR 216 to facilitate advance planning and provide information for the environment section of the R4.

204.5.5 MISSION ENVIRONMENTAL OFFICER (MEO) AND REGIONAL ENVIRONMENTAL OFFICER (REO)

* Each Mission Director shall appoint a Mission Environmental Officer. These officers normally serve as a core member of each SO Team in the Operating Unit in order to advise the Teams on specific needs and approaches to meet 22 CFR 216 requirements. The MEOs frequently take the lead in overseeing 22 CFR 216 document preparation on new activities and monitoring compliance on ongoing activities. However, the ultimate responsibility and accountability for successfully meeting 22 CFR 216 requirements belongs to every member on the Team and in particular to the team leader.(See Mandatory Reference 22 CFR 216)

In some cases a regional support mission may exist and have a Regional Environmental Officer who is available to the cluster of Operating Units it supports. In these cases the Regional Environmental Officer provides technical support and regional coordination to Mission Environmental Officers.

E204.5.5 Mission Environmental Officer (MEO) and Regional Environmental Officer (REO) - N/A

204.5.6 BUREAU ENVIRONMENTAL OFFICER (BEO)

* After consultation with the AEC, the Assistant Administrator (AA) for each operational Bureau in Washington shall appoint a qualified BEO based in Washington. This includes all

regional Bureaus plus all operational Central Bureaus (i.e. G and BHR). The BEO reviews and provides guidance on the environmental section of the R4; monitors overall 22 CFR 216 compliance of all Operating Units in the Bureau; approves all 22 CFR 216 documents, and performs the other specific functions described in 22 CFR 216. When staffing patterns permit, each AA shall also appoint a qualified Deputy BEO who can act on official 22 CFR 216 actions when the BEO is absent. **(See Mandatory Reference 22 CFR 216)**

E204.5.6 Bureau Environmental Officer (BEO)- N/A

204.5.7 AGENCY ENVIRONMENTAL COORDINATOR (AEC)

* The AEC shall oversee Agency-wide implementation of 22 CFR 216 to support the process in achieving its intended results. The AEC shall advise the Administrator, AAs, and other senior Agency management about issues that arise under 22 CFR 216, and with advice from the Office of the General Counsel, interprets how 22 CFR 216 should be applied to new or unusual situations. Specific additional responsibilities are described in 22 CFR 216. **(See Mandatory Reference 22 CFR 216)**

E204.5.7 Agency Environmental Coordinator (AEC) - N/A

204.5.8 DECISION-MAKING AUTHORITY

Within the operating unit the officer who has the authority to obligate funds for a program or activity signs the request for IEE, Categorical Exclusion or Exemption of the program or activity; and, if appropriate the Scoping Statement and EA or EIS (note: all of these 22 CFR 216 terms are defined in within 22 CFR 216). This officer submits these documents to the BEO for review and written concurrence. In certain cases outlined in 22 CFR 216 additional reviews and approvals in Washington may be required (e.g. requests for Exemptions, Deferrals, and EISs). After receiving the BEO's written concurrence the Operating Unit's decision-making officer must consider the environmental findings and recommendations made in the approved IEE, EA, or EIS when designing and approving funding for a program or activity. Additional decision procedures are described in 22 CFR 216. **(See Mandatory Reference 22 CFR 216)**

E204.5.8 Decision-Making Authority - N/A

***204.6 Supplementary Reference - N/A**

DRCD8/ads204

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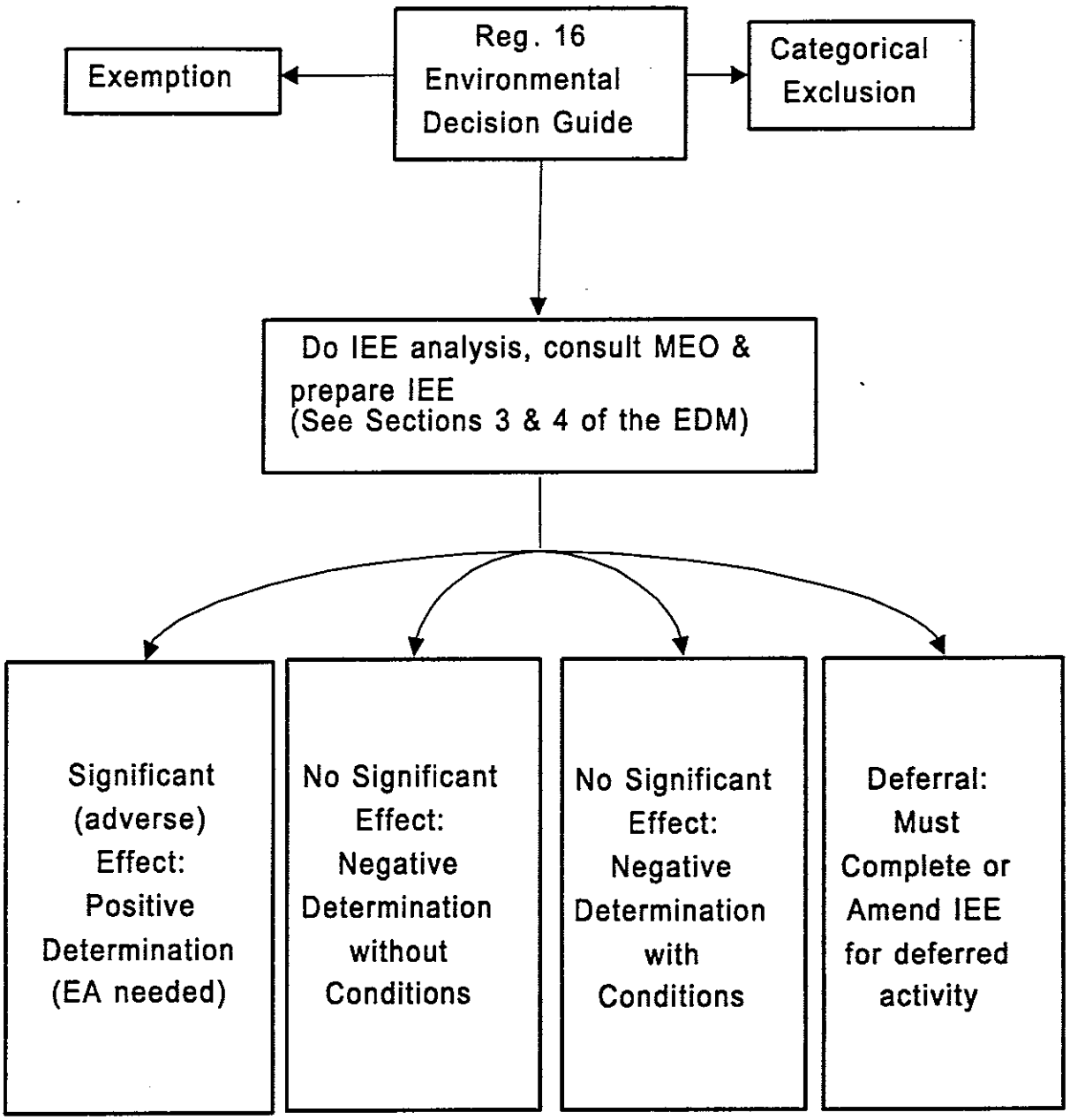
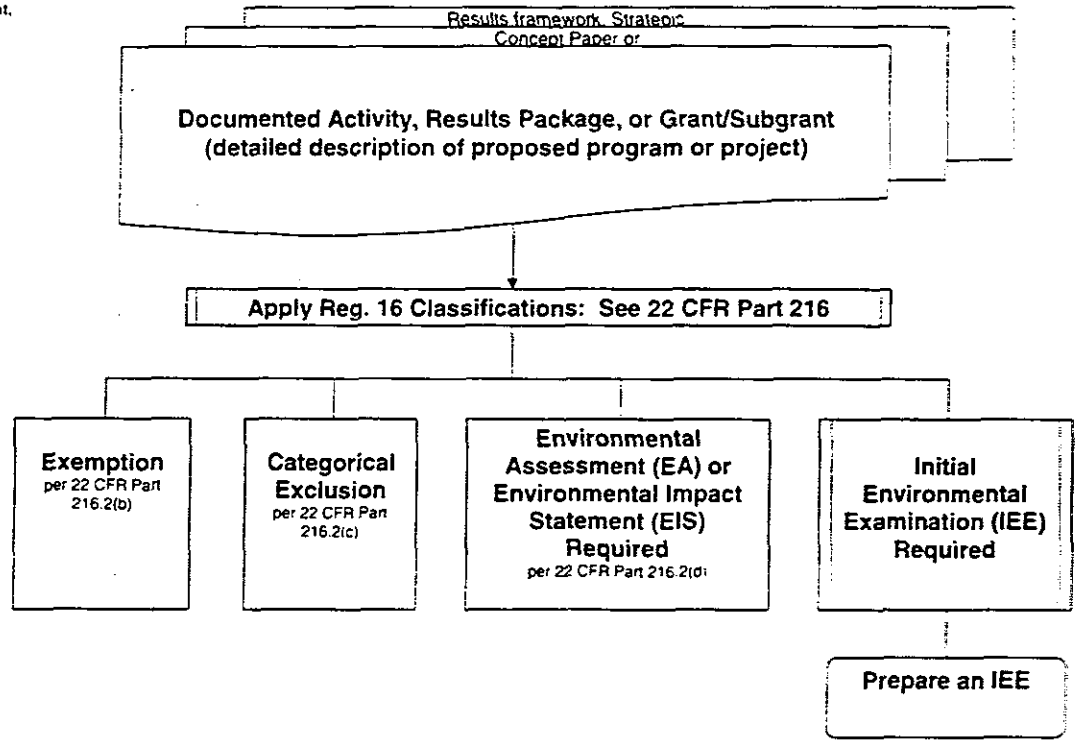

Exemption
Reg. 16 Environmental Decision Guide
Categorical Exclusion
Do IEE analysis, consult MEO & prepare IEE (See Sections 3 & 4 of the EDM)
Significant (adverse) Effect: Positive Determination (EA needed)
No Significant Effect: Negative Determination without Conditions
No Significant Effect: Negative Determination with Conditions
Deferral: Must Complete or Amend IEE for deferred activity

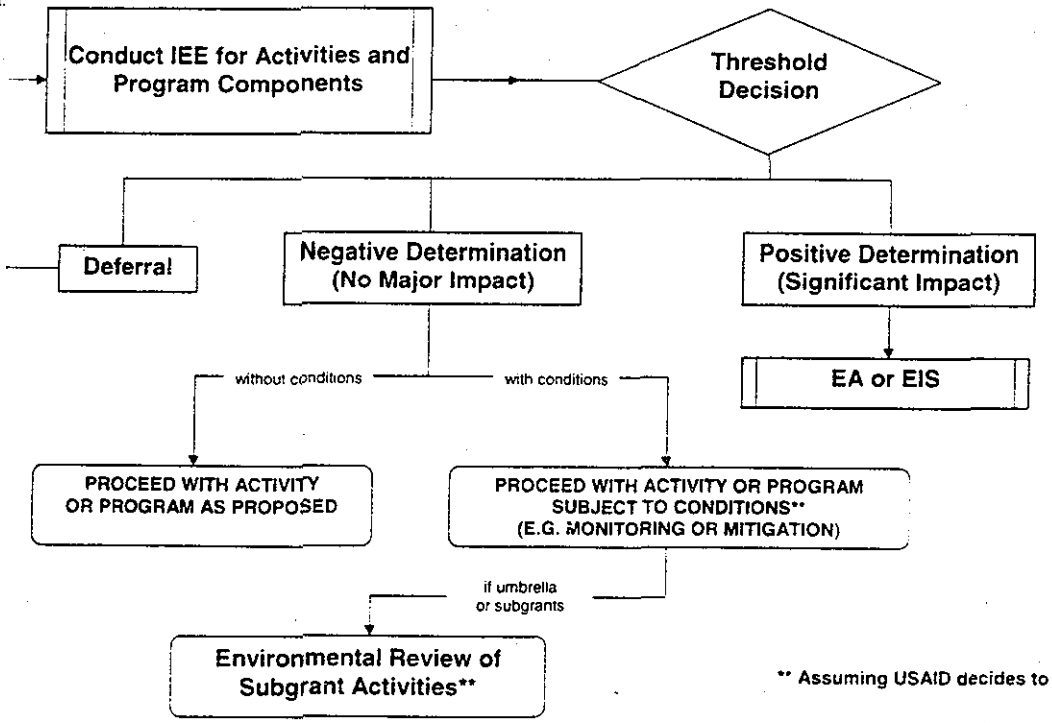
United States Agency for International Development, Africa Bureau

The Full Reg. 16



United States Agency for International Development.
Africa Bureau

Prepare IEE and Make Threshold Decision



** Assuming USAID decides to fund

USAID Environmental Review

USAID Operating Units and implementing partners are Responsible for ensuring compliance with the Agency's Environmental Procedures (22 CFR Part 216), known as "Reg. 216"; also see ADS 204, Environmental procedures.

Classification of Activities in Regulation 16

Exemptions

- Disaster assistance or other emergency situations such as famine relief

Note: exemptions not applicable for the procurement or use of pesticides.

Categorical Exclusions

- Education, training, or technical assistance; controlled experimental research; analysis, studies, workshops, meetings; project in which USAID is a minor donor; other activities with no foreseeable negative impact on the negative impact on the biophysical environment

Initial Environmental Examination (IEE)

USAID Missions must prepare an IEE, which makes a threshold determination as to whether the proposed program or program activity will have a significant impact on the environment

- Negative Determination - program or activity will have NO "significant" impact (normally requires an IEE)
- Positive Determination - program or activity Will have a significant impact (requires an Environmental Assessment)
- Deferred Determination - sub-activities that, in practice, are insufficiently identified environmental analysis is postponed until later

USAID ENVIRONMENTAL REVIEW

ENVIRONMENTAL ASSESSMENT (EA)

- Actions Affecting the Environment and Normally Requiring an EA - localized (sub-regional) programs in irrigation or water management, large-scale agricultural mechanization, etc.
- Programmatic Environmental Assessments (PEAs) - regional activities in river basins affecting multiple countries, road rehabilitation/construction programs affecting an entire country, etc.
- Supplemental Environmental Assessments (SEAs) - national locust control programs (based on Region-wide PEA)
- Strategic and Regional Environmental Assessments - address EA at strategic planning and aggregate impact levels

ENVIRONMENTAL IMPACT STATEMENTS (EIS)

Are required when proposed Agency actions affect:

- The global environment or areas outside the jurisdiction of any nation (e.g. the oceans)
- The environment of the United States; or
- Other aspects of the environment at the discretion of the Administrator
- Only one has been prepared since Reg. 216 was approved in 1978

PUBLIC LAW 480 - TITLE II FOOD AID FOR DEVELOPMENT

- Is now required to comply with Reg. 216
- PVO/NGO Grants
- PVO/NGO Subgrants: "umbrella" projects with a large number of subgrants

Environmental Procedures

European Bank
for Reconstruction and Development

85

Thus there will be two codes associated with each project:

- Assessments: A, B or C
- Audits: 0 or 1

These codes will be recorded on the Project Data Sheet.

The types of environmental information required on projects are discussed in detail in Section 3.3.

Screening and Initial Review

The Environmental Screening Memorandum, along with the updated Project Data Sheet, will be presented as part of the documentation for Initial Review. During Initial Review, the Operations Committee will review relevant environmental issues raised in screening and presented in the project documentation.

During the Initial Review Meeting, the Operations Committee will discuss the environmental issues associated with the project. The Operations Committee member responsible for the environment (the Director of Infrastructure, Energy and Environment) may, in certain circumstances, recommend that the project be rejected if potential environmental problems are deemed to make the project inappropriate for Bank assistance. Where appropriate, the Environmental Staff member who is working with the Team Leader on the project may be asked to join the Initial Review Meeting to describe the specific environmental concerns.

Documentation for the Project File

The Environmental Screening Memorandum is created during the screening process and it records the following information:

- Brief description of the project
- Environmental screening category
- Reason for screening into the chosen category
- Environmental issues apparent at screening
- Public participation requirements
- Other issues
- Further actions
- Date
- Signature of the Environmental Specialist and Team Leader.

The Project Data Sheet will record the following:

- Environmental screening categories
- The name of the member of the Environmental Specialist who will be the contact for the project (normally the person screening the project), listed in the section EBRD Team and Responsibility.

3. Environmental Staff Guidelines

This section sets out the European Bank's environmental procedures, as they are applied by the Environmental Staff. As shown in Section 1, although overall responsibility for carrying out environmental procedures on projects rests with the Team Leaders, the Environmental Staff will have a major operational role. For this reason, this section is comprehensive and detailed. These guidelines follow the sequence of environmental procedures as they interact with the progress of a project at different stages in the project approval process (see Figure 1-1).

3.1 Request for Environmental Information

Procedures for requesting environmental information early in the project identification stage have been designed to ensure that Team Leaders gather sufficient information to enable the Environmental Staff to undertake environmental screening and to define in detail the environmental information requirements after Initial Review.

The Guide to Presenting Proposals is given to potential project sponsors by Merchant and Development Banking to elicit a variety of financial and other project-related information. This form has been designed to include environmental and operations-related information. Initial requests for information on a proposed project should include a summary of key environmental issues associated with the project. **Team Leaders should make every effort during project identification to ensure that this information is provided as early as possible.**

The full preliminary information request form is shown in Annex 2. The information useful for environmental screening is highlighted.

3.2 Environmental Screening

Proposed projects have a wide variety of potential environmental impacts and will require different levels of environmental information to enable the Bank to assess their associated environmental concerns and liabilities. The Bank has Screening Procedures which identify the level of information needed on a project before the project can be approved. Additional information may be required at any stage of a project, should additional environmental concerns be identified.

Screening Procedures

The following procedures apply to all projects, regardless of type or anticipated environmental impact.

- Projects should be screened when a project is in the exploratory stage, after projects have satisfied financial and other criteria. Thus screening should occur shortly before Initial Review.

- To initiate screening, the Team Leader should contact the Senior Environmental Specialist in Infrastructure, Energy and Environment to arrange a meeting to screen the project. At the meeting the Team Leader will describe the project briefly, indicating what environmental information is already available on the project. The Environmental Specialist assigned to the project will screen the project into a screening category, determining the environmental information required for the project. The meeting should take around 10-20 minutes for most projects.

- The Environmental Specialist will prepare an Environmental Screening Memorandum containing a brief description of the project, the environmental screening category, the reason for screening into the chosen category, the environmental information required and the environmental issues which are apparent at this stage. A sample Environmental Screening Memorandum is presented in Annex 2. The Screening Memorandum will be submitted at the project's Initial Review.

- The Team Leader records the environmental screening category in the Project Data Sheet, which will be submitted at Initial Review (see Annex 2). The Team Leader should also record the name of the Environmental Staff assigned in the section of the Project Data Sheet titled "EBRD Team and Responsibilities".

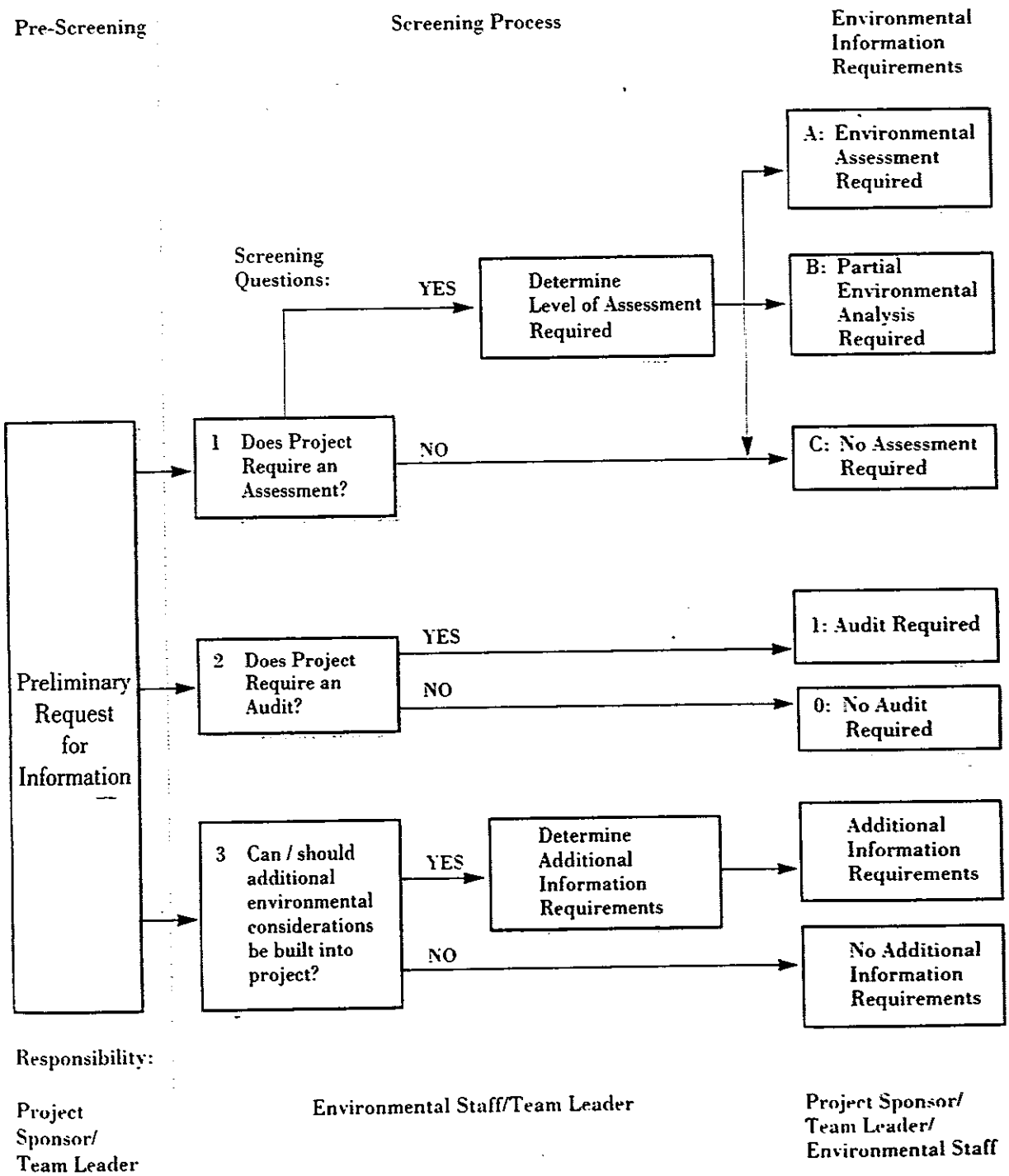
Screening Categories

The paths which a project can take during the definition of its screening category are illustrated in Figure 3-1. This Figure shows the decision points and outcomes in the screening undertaken by the Environmental Staff. These decision points are set out below.

1. *Does the project need an environmental assessment?*
   An environmental assessment may be needed for projects involving any of the following:

   - development of a greenfield site;
   - expansion of an existing facility onto undeveloped land;
   - public infrastructure projects;
   - projects which have the potential to cause environmental impacts outside the area occupied by the project; or
   - whenever required by law.

Figure 3-1: Environmental Screening Procedure



89

For such projects, it is necessary to determine the type of environmental assessment they require, according to the following general rules. A project may be upgraded to a higher category, should significant environmental concerns be identified during the investigation, or downgraded to a lower category if concerns prove to be less serious than first anticipated.

The Lists A, B and C contained in Appendix 1 to the Bank's Environmental Policy (reproduced toward the end of Annex 1 of this document) are used to guide the decision into which category a project should be screened.

- Projects on List A will require a full Environmental Assessment (EA). These will be screened into Category A.

- Projects on List B will require a Partial Environmental Analysis (which may vary from a limited environmental assessment to stipulation of environmental guidelines). These will be screened into Category B.

- Projects on List C and projects with no identifiable environmental impact will not require an environmental assessment. These will be screened into Category C.

- Projects falling within lists contained in national legislation will be screened into the more stringent environmental assessment category out of the Bank lists and the Government lists.

2. *Does the project need an environmental audit?*
Projects will require an audit if they involve property transfer, lease of property or modifications to existing operations.

A category will be assigned to each project as follows:

"0" = No environmental audit required.

"1" = Environmental audit required.

3. *Can/should additional environmental considerations be built into a project?*
   - Projects may also offer opportunities for incorporating environmental improvements which would enhance the project with little or no reduction in efficiency.

   - Projects will need specialised environmental information if they involve investment in Financial Intermediaries (see Section 3.3.4).

No coding category is assigned to these responses.

ENVIRONMENTAL COMPLIANCE FACESHEET

Title and Number of Activity/Project/SO:

Country/Region:

Funding Period: FY_____ - FY_____ Resource Levels/Amount(s)

Statement Prepared by: Name _____ Date _____
Title _____

IEE Amendment (Y/N)? ____ **Date of Original IEE:** _____

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
*air*___ *water*___ *land*___ *biodiversity* (specify)_____ *human health*____ *other*____ *none*____

Environmental Action(s) Recommended (check all that apply):

_____ 1. *Categorical Exclusion*(s)

_____ 2. Initial Environmental Examination:

____ *Negative Determination*: no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:
- ____ without conditions (no special mitigation measures needed; normal good practices and engineering will be used)
- ____ with conditions (special mitigation measures specified to prevent unintended impact)

____ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.
- ____ conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

____ *Positive Determination*: IEE confirms potential for significant adverse effect of
- ____ EA to be / being / has been (circle one) conducted. Note that the activities affected cannot go forward until the EA is approved.

____ *Deferral:* one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved. Briefly describe the nature of the deferred activities:_____

Summary of Findings:

Briefly describe (in 1 or 2 paragraphs) the activities being implemented or proposed and those deferred. Justify the reason for the recommended action(s) and cite appropriate sections of Reg. 216 as needed. For IEEs, reproduce here the Summary from Section 5 of the IEE narrative, and/or Section 2 of the Request for Categorical Exclusion.

Revisions:

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this determination will be reviewed and revised by the originator of project and submitted to the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

Mission Director: _____ Date: _____

Regional Environmental Officer-(Optional) _____ Date: _____

Concurrence:

Bureau Environmental Officer: _____ Date: _____

Approved: _____

Disapproved: _____

Optional Clearances:

Mission Environmental Officer: _____ Date: _____

General Counsel: _____ Date: _____

REQUEST FOR A

CATEGORICAL EXCLUSION

1. Background and Activity Description

More in-depth information than what was provided on the cover sheet, especially if activities are relatively diverse, complex, and likely to operate for several years. This will allow the environmental recommendation to be more self-explanatory and free-standing, especially for the BEO's record keeping and tracking purposes.

2. Justification for Categorical Exclusion Request

Refer to appropriate guidance from Reg. 216, especially 22 CFR 216.2(c)

Outline of the IEE Narrative: Template

INITIAL ENVIRONMENTAL EXAMINATION

Program/Project/SO/ Activity Data:
Program/ Project/ SO/ Activity Number:
Country/Region:
Title of Program/Project/ SO/ Activity/Project:

1. **BACKGROUND AND ACTIVITY DESCRIPTION**

   - **1.1 Background**
   - **1.2 Description of Activities**
   - **1.3 Purpose and Scope of IEE**

2. **COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)**

   - **2.1 Locations Affected**
   - **2.2 National Environmental Policies and Procedures (of host country both for environmental assessment and pertaining to the sector)**

3. **EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL**

4. **RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)**

   - **4.1 Recommended IEE Determination**
   - **4.2 Mitigation, Monitoring, and Evaluation**

   FOR UMBRELLA IEE, THE FOLLOWING MIGHT BE USED:
   - **4.1 Recommended Planning Approach**
   - **4.2 Environmental Screening and Review Process**
   - **4.3 Promotion of Environmental Review and Capacity Building Procedures**
   - **4.4 Environmental Responsibilities**
   - **4.5 Mitigation, Monitoring, and Evaluation**

5. **SUMMARY OF FINDINGS**

   - **5.1 Environmental Determinations**
   - **5.2 Conditions**

Annotated IEE Narrative

INITIAL ENVIRONMENTAL EXAMINATION

Program/Project/SO/ Activity Data:
Program/ Project/ SO/ Activity Number:
Country/Region:
Title of Program/Project/ SO/ Activity/Project:

The following narrative should be organized around the major activity sub-headings, if the activity categories are rather distinct, e.g., road construction, agricultural development, and irrigation works. As in sample IEEs (see enclosed), treat each major activity under each section. Alternatively, one could organize by activity and then each major heading would cover the Sections 1 to 4. The summary in Section 5 is to cover all categories addressed, with an overview of the summaries at the end.

If you are preparing an "Umbrella" IEE, please refer to Annex F of the EDM/FAM for the detailed description of what the outline might include.

1.0 BACKGROUND AND ACTIVITY DESCRIPTION

Describe why the activity is desired and appropriate, and outline the key activities proposed for funding. A current activity description should be provided and the purpose and scope of the IEE indicated (amendment, why needed, what it covers).

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION

This section is critical and should briefly assess the current physical environment that might be affected by the activity. Depending upon the activities proposed, this could include an examination of land use, geology, topography, soil, climate, groundwater resources, surface water resources, terrestrial communities, aquatic communities, environmentally sensitive areas (e.g., wetlands or protected species), agricultural cropping patterns and practices, infrastructure and transport services, air quality, demography (including population trends/projections), cultural resources, and the social and economic characteristics of the target communities.

The information obtained through this process should serve as an environmental baseline for future environmental monitoring and evaluation. Be selective in the country and environmental information you provide, as it should be specific to the activity being proposed and more information is not necessarily better.

Finally, indicate the status and applicability of host country, Mission, and Cooperating Sponsors (PVOs & NGOs) policies, programs and procedures in addressing natural resources, the environment, and other related issues.

3.0 EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

This section of the IEE is intended to define all potential environmental impacts of the activity or project, whether they are considered direct, indirect, beneficial, undesired, short-term, long-term, or cumulative.

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

For each proposed activity or major component recommend whether a specific intervention included in the activity should receive a categorical exclusion, negative determination (with or without conditions), positive determination, etc., as well as cite which sections of Reg. 216 support the requested determinations.

Recommend what is to be done to avoid, minimize, eliminate or compensate for environmental impacts. For activities where there are expected environmental consequences, appropriate environmental monitoring and impact indicators should be incorporated in the activity's monitoring and evaluation plan.

5.0 SUMMARY OF FINDINGS

This should summarize the proposed environmental determinations and recommendations.

SAMPLE IEE DOCUMENTS

1. Categorical Exclusion-Russia, Project 110-0005 under SO 1.3 and SO 1.4
2. Categorical Exclusion (CE) & Negative Determination (ND)-Russia, SOs 2.1, 2.2, 4.1/ 4.2
3. Medical Assistance-NIS Regional for Carelift Int'l , SO 3.2
4. Health-Seven Activities of Project 118-032 under SO 3.2a
5. Macedonia-EAPS Project
6. FOREST Project-Russia (CE, ND with conditions and Umbrella IEE)
7. Infrastructure
8. Regional Water-South Caucasus (Armenia, Azerbaijan and Georgia)
9. SO 1.6-Improved Management of Critical Natural Resources including Energy for 5 CAR countries
10. Energy-Serbia, 169-0005
11. Ecolinks Grants Program- An Umbrella IEE with requirement on Environmental Review Procedures

ENVIRONMENTAL COMPLIANCE FACESHEET

Title of the Project: No. 110-0005 under SO 1.3, SO 1.4.

Country/Region: Russian Federation

Funding Period: FY1999 -2002 **Resource Levels/Amounts:** $ 10,065,570

Statement Prepared by: Marina Mikhailova Date: February 13, 2001
Revised: February 13, 2001

IEE Amendment (Y/N): No **Date of Original IEE:** February 13, 2001

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
*air*__ *water*__ *land*___ *biodiversity* (specify)_____ *human health*___ *other*____ *none*_ x_

Environmental Action(s) Recommended (check all that apply):

_x___ 1. *Categorical Exclusion*(s)

___ 2. Initial Environmental Examination:

____ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.
____ conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

Summary of Findings:

The proposed action to be undertaken under SO 1.3. and SO 1.4., project No. 110-0005 activities is entirely within the classes of action cited in Title 22 of the Code of Federal Regulations (CFR) Section 216.2, (Applicability of Procedures) paragraph (c)(2), [22CFR216.2(c)(2)] and therefore, are categorically excluded. Pursuant to 22CFR216.2(c)(3), the originator of the proposed actions has determined that all activities under the RIBS project are fully within the following classes of action:

Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction) [22 CFR 216.2(c)(2)(i)].

Analyses, studies, academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)].

Document and information transfers [22 CFR 216.2 (c)(2) (v)].

Studies, projects or programs integrated to develop capability of recipient countries to engage in development planning, except to the designed to result in activities directly affecting the environment (such as construction of facilities, etc.) [22 CFR 216.2 (c)(2) (xiv)].

Revisions:

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant", this determination will be reviewed and revised by the originator of the project and submitted to the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

Mission Director, USAID/Russia : _____ Date: 2/21/01

Regional Environmental Officer, REO/WA: _____ Date: 2/20/01
(M. A. LATIF)

Concurrence:

Bureau Environmental Officer: Carl J. Maxwell Date: 2/21/01

Approved: ✓

Disapproved: _____

Optional Clearance:

Business Development and Investment Office Director: _____ Date: 2/20/01

Annex A.2

REQUEST FOR A

CATEGORICAL EXCLUSION

1. Background and Activity Description

This Request for Categorical Exclusion (RCE) is for the business development activities under SO 1.3. and SO 1.4.

1.1. SO 1.3., project 110-0005 consists of the following activities:

1.1.1. Entrepreneurial Business Services/East

This activity includes education, technical assistance, such as consulting and training to promote acceleration of development and growth of private enterprise in the RFE and Siberia by: enhancing the sustainability of small and medium-sized enterprises (SMEs); strengthening a group of selected Russian business support institutions (BSIs) across the regions to deliver high-quality demand-driven, fee-based business support services to SMEs; and developing indigenous capacity among Russian BSIs to administer similar volunteer technical services in the future.
Over the two years of this activity, ACDI/VOCA will assist 725 clients in the East of Russia with the help of 290 volunteers and will strengthen 10 local Russian partners.

1.1.2. Entrepreneurial Business Services/West

This activity includes education, technical assistance, such as consulting and training to promote the development and growth of private enterprise in Western Russia by: enhancing the sustainability of small and medium-sized enterprises (SMEs); strengthening a group of selected Russian business support institutions (BSIs) to deliver high-quality demand-driven, fee-based business support services to SMEs; and developing indigenous capacity among Russian BSIs to administer similar volunteer technical services in the future.
Over the two years of this activity, Citizens Democracy Corps (CDC) will assist 700 clients in the West of Russia with the help of 350 volunteers and will strengthen 11 local Russian partners.

1.1.3. Implementation of Innovative Technologies Program (INTECH/Tomsk) in Tomsk Oblast

The main aim of Innovative Technologies program in Tomsk is to provide technical assistance to technology-based enterprises in Tomsk, so that they commercialize their ideas and products, market the models of scientific technologies, train managers in selected firms on how to develop their products for both the Russian and the international market.
Increase support and capacity for the Business Support Institutions (BSI) in Tomsk use a model of technology commercialization of small and medium-sized technology-based enterprises developed in the Samara Oblast with the view of its further replication in other regions.

1.1.4. *Regional Initiative Promotion of International Accounting Standards (Tomsk)*

This program includes technical assistance, training programs, education, studies that support the promotion of international accounting standards (IAS) in the Tomsk Region to help enterprise management and financial officers learn new management techniques based upon open market

financial practices. The following activities focus upon the various aspects of IAS introduction and application are being organized under this program: seminars for high-level management; workshops for trainers; workshops for accountants/auditors; strengthening the capacity of local accounting associations; and assisting select local enterprises to prepare financial statements based on IAS.

1.1.5. **American Business Center (ABC) in Yuzhno-Sakhalinsk**

Through technical assistance, document and information transfers, studies the ABC activities provide support to companies either currently doing business or interested in entering the Sakhalin region, and thereby promote the development of trade and cooperation in all economic sectors by: providing up-to-date information and counseling on project development, market conditions; providing in-depth, accurate market research; implementing the highly successful search for partner initiatives; act as a center for commercial, legal and technical information, including environmental and export control information for firms and organizations of both countries; provide information and assistance to US Government in Russia and the US, covering commercial, political and other regional developments.

1.1.6. **Business Climate Survey**

Through analyses, academic and research workshops and meetings this activity is to collect and analyze the relevant statistical data pertaining to the small and medium-sized enterprise (SME) sector within selected regions of the Russian Federation. Specific outcomes are expected to be: collection of data through formal and informal interviews with 125 enterprises in 8 regions; preparation of a study containing a comprehensive analysis and assessment of the economic and institutional environment for small and medium businesses in 8 selected regions of Russia; presentation of survey results to USAID; and publication and dissemination of results among policy makers, investors, donor community members, and others seeking to support small and medium business.

1.2. SO 1.4., project 110-0005 consists of the following activities:

1.2.1. **Adoption of International Accounting Standards (IAS)**

This program includes analyses, studies, training programs to support the adoption of international accounting standards (IAS) to help Russian enterprises attract foreign or domestic investment and manage their existing resources more effectively. It is implemented in partnership with the International Center for Accounting Reform (ICAR), the Foundation for International Accounting Reform in Russia (FIAR), and the American Chamber of Commerce (AMCHAM) in Russia. This program emphasizes: preparation and publication of an authenticated Russian translation of IAS; international donor coordination in the realm of accounting standards definition, implementation and training; preparation of a series of implementing instructions for application of IAS in Russia; and seminars to facilitate the transition to full implementation of IAS.

As stated above, the activities under SO 1.3. and SO 1.4. focus on strengthening of business support institutions, capacity building, partnership facilitation, and training. As a result there is little expectation that the activities will have any sort of environmental impact.

101

2. **Justification for Categorical Exclusion Request**

The proposed actions to be undertaken under the SO 1.3. and SO 1.4 activities are entirely within the classes of action cited in Title 22 of the Code of Federal Regulations (CFR) Section 216.2, (Applicability of Procedures) paragraph (c)(2), [22CFR216.2(c)(2)] and therefor are categorically excluded. Pursuant to 22CFR216.2(c)(2), the originator of the proposed actions has determined that these activities are fully within the following classes of action:

Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction) [22 CFR 216.2(c)(2)(i)].

Analysis, studies, academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)].

Document and information transfers [22 CFR 216.2 (c)(2) (v)].

Studies, projects or programs integrated to develop capability of recipient countries to engage in development planning, except to the designed to result in activities directly affecting the environment (such as construction of facilities, etc.) [22 CFR 216.2 (c)(2) (xiv)].

Revisions:

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant", this determination will be reviewed and revised by the originator of the project and submitted to the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

ENVIRONMENTAL COMPLIANCE FACESHEET

Title of Activity/Activity Number: Citizens' Participation in Political Decision-Making under SO 2.1; Strengthening Rule of Law and Respect for human Rights under SO 2.2; Cross-cutting Programs (Training) under SO 4.1/4.2

Country/Region: Russian Federation

Funding Period: FY2001-FY2006 Resource Levels/Amount(s) $18 million/year

Statement Prepared by: Name: Susan Reichle / Irina Turchina

Date: 02.20.2001

IEE Amendment (Y/N)? N **Date of Original IEE:** 02.20.2001

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
*air*___ *water*___ *land*___ *biodiversity* (specify)_____ *human health*____ *other*____ *none*_X

Environmental Action(s) Recommended (check all that apply):

___X__ 1. *Categorical Exclusion*(s)

___X__ 2. Initial Environmental Examination:

___X__ *Negative Determination*: no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:
___X__ without conditions (no special mitigation measures needed; normal good practices and engineering will be used)
____ with conditions (special mitigation measures specified to prevent unintended impact)

____ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.
____ conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

____ *Positive Determination*: IEE confirms potential for significant adverse effect of
____ EA to be / being / has been (circle one) conducted. Note that the activities affected cannot go forward until the EA is approved.

____ *Deferral:* one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved. Briefly describe the nature of the deferred activities:_____

103

Summary of Findings:

The proposed actions, unless noted otherwise, fall within the classes of action cited in 22CPR 216.2 (c)(2), "Applicability of Procedures," of Title 22 CFR Part 216, "AID Environmental Procedures" and are therefore categorically excluded. Pursuant to 22 CFR 216.2(c)(3), originator of the project has determined that the proposed action is within the following classes of action or have a negative determination without conditions:

a)

- Technical assistance and training programs - [22 CFR 216.2(c)(2)(i)].
- Analyses, studies, or academic workshops and meetings - [22 CFR 216.2(c)(2)(iii)].
- Document and information transfers - [22 CFR 216.2(c)(2)(v)].
- Programs involving nutrition, health care or population and family planning services, except to the extent designed to include activities directly affecting the environment (such as disposal of medical waste, etc.) - [22 CFR 216.2(c)(2)(viii)].

b)

Activities of action not covered under (a).

Pursuant to 22 CFR 216.3(a)(2)(iii), activities under this category will not have a significant effect on environment. Therefore, originator of the project proposes a negative determination without conditions.

Revisions:

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this negative determination will be reviewed and revised by the originator of the project and submitted to the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

A/Mission Director: _____ Date: 2-22-01

Regional Environmental Officer: _____ Date: 2-22-01
M A. LATIF

Concurrence:

Bureau Environmental Officer: Carl J. Maxwell Date: 2/26/01

Approved: ✓

Disapproved: _____

Optional Clearances:

Office Director: _____ Date: 2/21/01

Mission Environmental Officer: Carol Peasley Date: 2/21/01

104

1.9 Independent Television

This activity will provide training that is integrated with other assistance, including program production, news competitions, information services, small equipment grants and individualized consulting to independent (non-state) commercial television stations. These coordinated activities:

- develop the technical capacity of independent TV broadcast stations to produce news and public affairs broadcasting in informative and interesting ways, using modern professional technologies; and
- foster economic sustainability of independent television stations in a competitive market environment, which involves introducing survival techniques to these stations during periods of market instability.

1.10 National Press Institute (NPI)

This activity will strengthen independent regional newspapers by providing the following services:

- Newspaper Business Development Service (BDS) promotes the economic self-sustainability of regional non-state newspapers by providing consulting services, publishing handbooks and disseminating business development information over the Internet. In the fall of 1998, BDS refocused its activities on dissemination of information through cost-cutting methods and survival mechanisms;
- Legal Consulting Service provides legal advice on media business-law related cases to regional non-state newspapers;
- Comprehensive Media Support: NPI's network of regional press centers provides comprehensive support to regional media in such areas as press conference services, professional journalism and media management training, cyber journalism, and research; and
- Institutional Development: NPI was implementing management improvements to complete its transformation into an independent self-sustaining Russian NGO.

1.11 Strengthening Democracy through Public Awareness

This activity will strengthen democracy and promotes transparency in the Russian election system by providing reliable, unbiased information and technical assistance to all participants in the electoral process.

1.12 Political Institutions in a Democratic Society

This activity will support the development of political institutions, focusing on political party development, NGO development, training-of-trainers programs and increasing the role of women and youth in politics.

1.13 Political Institutions in a Democratic Society

This activity will support the development of political institutions, focusing on political party development, NGO development, training-of-trainers programs and increasing the role of women and youth in politics.

1.14 Strengthening Democratic Institutions and Civil Society

This activity will promote the development of a democratic political culture among Russian politicians and policy makers. It supports a growing network of democratically minded young Russian political, administrative, intellectual and business leaders in the regions through intensive seminars that:

- reinforce the basic tenets of a democratic society and increase participants understanding of the workings of modern liberal political and economic systems;
- encourage discussion of how liberal political and economic systems can be best adapted to conditions in Russia;
- encourage closer and more durable cooperation between Russian policy makers of different political persuasions; and
- encourage regular working exchanges between Russian and foreign policy makers.
- publishing works by international academic leaders and practitioners on democracy and democratic theory.

1.15 Political Participation: Parties and Civic Participation

This activity will increase citizen involvement in the electoral process and governance by strengthening political parties and citizen links to them. The activity accomplishes this by:

- Enabling civic groups to promote the openness and accountability of governmental institutions;
- fostering communication and consensus building among various political groups; and
- encouraging political parties to develop as institutions.

1.16 Citizen Participation in Samara

This activity will promote citizen participation in regional and local decision-making. The activity emphasizes three main outcomes:

- strengthen democratic institutions and procedures;
- create links between government, business, and community-based organizations;
- establish sustainable citizens' task forces, focused on specific issues, that will provide for citizen participation in local decision-making; and
- improve the climate for economic growth and political reform in the Samara region.

1.17 Development of the Legal Profession

This activity will support the development of the legal profession through establishing CLE and legal clinics, and addresses legal issues affecting women in Russia through technical assistance and training support.

1.18 Judicial Exchange Program Between the Russian and US Judiciaries

This activity will build upon already established partnerships and cooperation between the Russian and U.S. judiciaries through a focused and targeted exchange and training program involving:

- The Judicial Department of the Supreme Court of the Russian Federation (with the involvement of the Council of Judges) and the Administrative Office of the US Courts (AOUSC) to promote the independence of the courts of general jurisdiction and strengthen the internal governance of the courts;
- The Academy of Justice of the RF and the Federal Judicial Center (FJC) to improve the system for continuing judicial education and support the development of the Academy; and
- The Supreme Qualifying Collegium and foreign experts to support judicial ethics.

1.19 Eurasia Foundation/Anti-Corruption Grant Program

The activities of this program will support anti-corruption efforts of grass roots organizations through a competitive, small grants program, targeting Russian NGOs which address issues of corruption prevention.

1.20 Enforcement of Judgments

This activity will promote improvement in the Bailiffs (Court Marshals) Service's ability to enforce judicial decisions.

1.21 Human Rights Monitoring

This activity will support increased awareness and respect for human rights through technical assistance and training to:

- improve human rights advocacy, monitoring and reporting on the human rights situation by regional human rights NGOs;
- establish regional human rights monitoring and reporting networks and cooperation among human rights NGOs, media and government officials in selected regions of the Russian Federation; and
- produce and disseminate an all-Russia report on human rights abuses.

1.22 Anti-Corruption Program Feasibility Study

This activity will gauge the potential for joint or cooperative efforts by Russian NGOs, businesses, and local government bodies to combat corruption by:

- Assessing the extent of the problem of corruption in two Regional Initiative areas (Tomsk and Samara);

- Assessing the extent of political will, law enforcement efforts, and NGO activism and capabilities directed against the problem of corruption;

- Suggesting concrete steps that can be taken to strengthen existing anti-corruption efforts or launch new ones.

1.23 Judicial Reform Program
The Russian-American Judicial Partnership (RAJP)

The activities of RAJP will:
- Improves the system for continuing legal education within the commercial courts

- Promotes the independence of the courts of general jurisdiction through support for the Judicial Department
- Strengthens the internal governance of the courts through the Council of Judges
- Supports the new Academy of Justice
- Supports judicial ethics through the Supreme Qualifying Collegium

1.24 Strengthen Corporate Governance

This activity will support the dissemination of key principles of corporate governance to Russian policy makers and officials by:

- familiarizing Russians with the main issues surrounding corporate governance and investor sensitivities;

- providing expert review and recommendations based on OECD and other transition economies' experiences; and

- supplying Russian policy makers with an influential policy forum.

1.25 Strengthen Human Rights NGOs

This activity will support the development of civil society and increases awareness and respect for human rights through technical assistance for the Sakharov Center, a human rights NGO consisting of a Museum, Public Center, Library and Archive. The Center presents expositions and carries out research, publishing and educational programs structured around three topics:

- the totalitarian past;
- Russia's contemporary problems; and
- the life and work of Andrei Sakharov.

1.26 Sustaining Partnerships into the Next Century (SPAN)

The SPAN program is an umbrella program of grants to support, deepen and expand existing partnerships between Russian and US organizations in USAID/Russia's key priority areas. The program provides funding to sustain partnerships and exchanges between Russian and American organizations for the next century. The targeted sectors are Civil Society, Rule of law, Business Development, Social Sector Reform, Environment, and Health.

1.27 Russia Training for Development (TFD) Activity

The TFD Activity is a training program to equip Russian leaders and professionals with skills needed to guide the transition to a free market economy and democratic governance. Training programs are implemented in both the U.S. and Russia. All participants are eligible for follow-on activities in Russia.

2. JUSTIFICATION FOR CATEGORICAL EXCLUSION REQUEST OR NEGATIVE DETERMINATION WITHOUT CONDITIONS.

The proposed actions, unless noted otherwise, fall within the classes of action cited in 22CPR 216.2 (c)(2), "Applicability of Procedures," of Title 22 CFR Part 216, "AID Environmental Procedures" and are therefore categorically excluded. Pursuant to 22 CFR 216.2(c)(3), originator of the proposed action has determined that the proposed action is within the following classes of action or have a negative determination without conditions:

a)

- Technical assistance and training programs - [22 CFR 216.2(c)(2)(i)].
- Analyses, studies, or academic workshops and meetings - [22 CFR 216.2(c)(2)(iii)].
- Document and information transfers - [22 CFR 216.2(c)(2)(v)].
- Programs involving nutrition, health care or population and family planning services, except to the extent designed to include activities directly affecting the environment (such as disposal of medical waste, etc.) - [22 CFR 216.2(c)(2)(viii)].

b)

Activities of action not covered under (a).

Pursuant to 22 CFR 216.3(a)(2)(iii), activities under this category will not have a significant effect on environment. Therefore, originator of the project proposes a negative determination.

Revisions:

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this negative determination will be reviewed and revised by the originator of the project and submitted to the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

INITIAL ENVIRONMENTAL EXAMINATION
OR
CATEGORICAL EXCLUSION

PROGRAM/ACTIVITY DATA:

Program/Activity Number/SO: EEU-A-00-00-00001-00
Country/Region: NIS Regional
Program/Activity/SO Title: SO3.2
Carelift International, Medical Assistance to the NIS
Funding Begin: 11/1/99 **Funding End:** 10/31/01 **LOP Amount:** $1,500,000
IEE Prepared By: Paul Holmes, EE/EEST
Current Date: _____
IEE Amendment (Y/N): N

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion:	X	Negative Determination:	X
Positive Determination:		Deferral:	

ADDITIONAL ELEMENTS: (Place X where applicable)
EMEMP: _____ CONDITIONS: X PVO/NGO: _____

SUMMARY

- *USAID signed a Cooperative Agreement with Carelift International to acquire, deliver and* install medical equipment and medical supplies, and provide equipment-related training to support American International Health Alliance (AIHA) health partnerships (hospitals and clinics) in the independent states. The $1.5 million program runs through October 31, 2001.
- This IEE sets forth "Categorical Exclusions" for several elements of the program and the conditions and guidance by which a "Negative Determination with Conditions" is recommended for the remaining program elements.
- Should Carelift International depart from any of the terms and conditions set forth in this IEE, it would have to obtain approval of the Bureau Environmental Officer before proceeding with program implementation.

Categorical Exclusions

The proposed activities listed in this section are given "Categorical Exclusions" because they fall entirely within one of the categories listed in paragraph (c)(1), "Categorical Exclusions," of Section 216.2, "Applicability of Procedures," of Title 22 CFR Part 216, "AID Environmental Procedures." Pursuant to 22 CFR 216.2(c)(3), exclusions are given for the following classes of actions:

- Technical assistance and training programs - [22 CFR 216.2(c)(2)(i)].
- Analyses, studies, or academic workshops and meetings - [22 CFR 216.2(c)(2)(iii)].
- Document and information transfers - [22 CFR 216.2(c)(2)(v)].
- Programs involving nutrition, health care or population and family planning services, except to the extent designed to include activities directly affecting the environment (such as *disposal of medical waste, etc.*) - [22 CFR 216.2(c)(2)(viii)].

Pursuant to 22 CFR 216.2(c)(2), each of these proposed actions is categorically excluded from further environmental review. As per 22 CFR 216.2(c)(1), neither an initial environmental examination nor an environmental assessment is required for an action that is determined to fall within one or more of these categories.

Negative Determination

For other program activities (and pursuant to 22CFR 216.3(a)(2)(iii)), Negative Determinations with Conditions are recommended because those activities entail the disposal of equipment or material which, if not disposed of properly, could have a significant adverse impact on the environment. These categories include:

- General medical equipment, including ventilators, infusion pumps, infant monitors, and diagnostic equipment;
- Medical supplies likely to be contaminated with blood or other body fluids, including sharps (this requires special protocol).catheters, bandages, sutures, syringes, and scalpels;
- Pharmaceuticals, including over-the-counter, and legend medications;
- Controlled substances; and
- Packaging materials.

Negative determinations on these activities carry with them the conditions that Carelift International will encourage, promote and monitor adherence to protocols concerning the proper handling, storage, use and disposal of these materials. Carelift will contact facility, local, oblast and national officials as appropriate, to design, implement and apply appropriate medical waste use, storage and disposal practices. Carlift International will:

- Briefly examine the storage, use and disposal practices of each participating partnership facility;
- Provide information, operational manuals, and training as appropriate;
- Assist facilities to strengthen medical waste use, storage and disposal practices; and
- Periodically monitor implementation of those practices.

Carelift is expected to apply, at a minimum, practicable guidance found in Chapter 16: "Minimal programmes for health-care waste management," Safe Management of Wastes from Health Care Activities, Edited by A. Prüss, E. Giroult, P. Rushbrook. Geneva, World Health Organization, August 1999. Other resources that might be utilized include: WHO Healthcare Waste Management Handbook (September 1997 draft and as revised).

The Cognizant Technical Officer (CTO) within EE/EEST will be responsible for the periodic monitoring of the environmental aspects of this program.

Revisions

Carelift will advise the CTO if it is unable to meet these conditions. Pursuant to 22CFR216.3(a)(9), if new information becomes available that indicates that activities to be funded under this cooperative agreement might be "major" and the program's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer. If appropriate, an environmental assessment will be prepared.

111

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

DAA/EE: _____ Date: _____

George Ingram

CONCURRENCE:

Bureau Environmental Officer: _____ Date: _____

Carl Maxwell

Approved: _____

Disapproved: ____

ADDITIONAL CLEARANCES:

Cognizant Technical Officer (CTO): _____ Date: _____

Paul Holmes

Chief, EE/EEST/HRHA _____ Date: _____

Mary Ann Micka

112

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY/SO DATA: EEU-A-00-00-00001-00
Country/Region: NIS Regional
Program/Activity/SO Title: SO3.2
Carelift International, Medical Assistance to the NIS

1.0 BACKGROUND AND PROJECT DESCRIPTION

In October 1999, USAID signed a Cooperative Agreement with the U.S. PVO Carelift International to acquire, deliver and install medical equipment and medical supplies, and provide equipment-related training to support AIHA health partnerships (hospitals and clinics) in the independent states. This $1.5 million, regionally-funded program (additional funds may be obligated in FY 2000) runs through October 31, 2001. Early shipments are anticipated to Ukraine, Moldova, Georgia, Kazakhstan and Russia, and subsequent shipments could be to any of the independent states.

As a result of this program, Carelift International expects to:

- Ship approximately $3 million worth of medical equipment and supplies;
- Help assure that major equipment is being used effectively and is well maintained;
- Help assure that the delivered supplies are used as intended; and
- Help assure on-going spare parts re-supply plans are in place and working for each recipient.

Under this CA, the material Carelift will ship in support of AIHA partnerships is expected to include:

- general medical equipment, including ventilators, infusion pumps, infant monitors, and diagnostic equipment;
- medical supplies likely to be contaminated with blood or other body fluids, including sharps (this requires special protocols), catheters, bandages, sutures, syringes, and scalpels;
- pharmaceuticals, including over-the-counter, and legend medications; and
- packaging materials.

Carelift does not expect to ship any controlled substances such as narcotics or other controlled pharmaceuticals; radioactive medical devices or radio-pharmaceuticals; cytotoxic drugs or devices containing such heavy metals as mercury, lead or cadmium. Should such substances subsequently be proposed, Carelift will discuss with EE/EEST/ENR, the specifics of the proposal including appropriate storage, use and disposal of such substances.

This Initial Environmental Examination provides a negative determination for packaging materials and sets forth the agreed upon Regulation 216 documentation and guidance for the remaining program components.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION

The cooperative agreement, under which this program operates, authorizes activities throughout the New Independent States (NIS). In general, there is little awareness of or concern about medical waste, either at the facility, local, oblast or national levels in NIS countries. Few countries have any medical waste legislation. Few offer training in the handling and disposal of medical waste, and few have the appropriate disposal equipment and infrastructure. Usually, infectious and hazardous medical wastes are mixed with municipal waste, without controlling or restricting access to the disposal area. This lack of awareness and procedures can prove hazardous to both public health and the environment. A typical example is increased rates of hepatitis B & C and HIV among healthcare workers and patients, due to improper handling and disposal of used syringes. In Kazakhstan, for example, 75% of all 40 years old have been infected with hepatitis B and according to a recent CDC study, more than 50% of new hepatitis B cases are acquired through unsafe injections and syringe mishandling.

3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

The general principles underlying this IEE are that Carelift International will ensure that the consequences of the program are identified and considered, and that appropriate procedures and safeguards are put in place to ensure the proper storage, use and disposal of program-provided equipment, pharmaceuticals and supplies.

4.0 RECOMMENDED MITIGATION ACTIONS

Categorical Exclusions

The proposed activities listed in this section are given "Categorical Exclusions" because they fall entirely within one of the categories listed in paragraph (c)(1), "Categorical Exclusions," of Section 216.2, "Applicability of Procedures," of Title 22 CFR Part 216, "AID Environmental Procedures." Pursuant to 22 CFR 216.2(c)(3), exclusions are given for the following classes of actions:

- Technical assistance and training programs - [22 CFR 216.2(c)(2)(i)].
- Analyses, studies, or academic workshops and meetings - [22 CFR 216.2(c)(2)(iii)].
- Document and information transfers - [22 CFR 216.2(c)(2)(v)].
- Programs involving nutrition, health care or population and family planning services, except to the extent designed to include activities directly affecting the environment (such as disposal of medical waste, etc.) - [22 CFR 216.2(c)(2)(viii)].

Pursuant to 22 CFR 216.2(c)(2), each of these proposed actions is categorically excluded from further environmental review. As per 22 CFR 216.2(c)(1), neither an initial environmental examination nor an environmental assessment is required for an action which is determined to fall within one or more of the categories listed at 22 CFR 216.2(c)(2).

Negative Determination

A negative determination in the case of packaging materials used in provision of equipment or supplies is provided for under USAID Environmental Procedures 22 CFR Part 216, Section 216.3 (a) (2), iii, since the design of the project is such that it is self-mitigating. Some solid waste will be generated from the packaging materials used in shipping equipment and supplies

to the host countries. However, the amount of packaging material, which accounts for only a small percentage of the total net-weight of each shipment, will be minimized by shipment directly to the intended user rather than an interim warehousing facility. In addition, wooden pallets are reusable if undamaged and are biodegradable when discarded. Cardboard boxes are also recyclable and biodegradable. Consequently, no significant environmental impact is expected from packaging materials used in shipment.

For other program activities (and pursuant to 22CFR 216.3(a)(2)(iii)), Negative Determinations with Conditions are recommended because those activities entail the disposal of equipment or material which, if not disposed of properly, could have a significant adverse impact on the environment. These categories include:

- General medical equipment, including ventilators, infusion pumps, infant monitors, and diagnostic equipment;
- Medical supplies likely to be contaminated with blood or other body fluids, including sharps (this requires special protocol).catheters, bandages, sutures, syringes, and scalpels;
- Pharmaceuticals, including over-the-counter, and legend medications; and
- Controlled substances.

The operational conditions underlying this IEE include the following:

1. Carelift International will encourage, promote and monitor adherence to protocols concerning the proper handling, storage, use and disposal of these materials. Carelift will contact facility, local, oblast and national officials as appropriate, to design, implement and apply appropriate medical waste use, storage and disposal practices. Carlift International will:

- Briefly examine the storage, use and disposal practices of each participating partnership facility;
- Provide information, operational manuals, and training as appropriate;
- Assist facilities to strengthen medical waste use, storage and disposal practices; and
- Periodically monitor implementation of those practices.

2. Carelift is expected to apply, at a minimum, practicable guidance found in Chapter 16: "Minimal programmes for health-care waste management," Safe Management of Wastes from Health Care Activities, Edited by A. Prüss, E. Giroult, P. Rushbrook. Geneva, World Health Organization, August 1999. Other resources that might be utilized include:

- WHO Healthcare Waste Management Handbook (September 1997 draft and as revised).
- Laurent, E. and C. Maher, 1998. "Disposal and Destruction of Syringes and Needles in Viet Nam and the Philippines." WHO Expanded Programme on Immunization, Geneva.
- Battersby, Anthony, 1998. "Notes on Incineration." WHO Expanded Programme on Immunization, Geneva.
- HealthTech, 1998. "Summary Strategic Analysis: Medical Waste-Disposal Technologies Point-of-Use Sharps Destruction."
- Force Institute, 1996. "Polysafe Safety Box & Incineration Container for Used Syringes and Needles." Polynor AS, Norway.
- "Vital to Health? Understanding your Choices--A Guide for Senior Decision Makers." WHO (Geneva) and USAID/Office of Health and Nutrition, Children's Vaccine Programme (Washington, DC), 1998.

115

- Healthcare Waste Management Guidance Note developed by the World Bank: search http://www.wbln0018.worldbank.org.

3. Periodic monitoring of the environmental aspects of this program by EE/EEST (ENR and HRHA).

Revisions

Carelift will advise the CTO if it is unable to meet these conditions. Pursuant to 22CFR216.3(a)(9), if new information becomes available that indicates that activities to be funded under this cooperative agreement might be "major" and the program's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer. If appropriate, an environmental assessment will be prepared.

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INITIAL ENVIRONMENTAL EXAMINATION

ENVIRONMENTAL COMPLIANCE FACESHEET

PROGRAM/ACTIVITY DATA:

Project/SO:	Seven activities of Project # 118-032 under SO 3.2.a
Country/Region:	Russia
SO Title:	Improve Effectiveness of Selected Social Benefits and Services
Funding Period:	September 1998 - September 2002
Resource Levels/Amounts	$40 million
IEE Prepared By:	Natalia Bryliova, USAID/SSR, Russia
Current Date:	February 15, 2001
IEE Amendment (Y/N):	N

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion:	X	Negative Determination:	X
Positive Determination:		Deferral:	

ADDITIONAL ELEMENTS: (Place X where applicable)

EMEMP: _____ CONDITIONS: X PVO/NGO: _____

SUMMARY OF FINDINGS:

Activities by USAID's Implementing Partners will promote the adoption of new approaches to resource management and service delivery, through: training and technical assistance in maternal and child health; development of improved responses to infectious diseases, specifically tuberculosis and HIV/AIDS. US-Russian partnerships will also increase access to primary health care. Legal and regulatory technical assistance will promote sector reform and quality improvements.

Categorical Exclusions

The following actions to be undertaken under the Health Project SO 3.2.a activities are entirely within the classes of action cited in Title 22 of the Code of Federal Regulations (CFR) Section 216.2, (Applicability of Procedures) paragraph (c)(2), [22CFR216.2(c)] and therefore, are categorically excluded. Pursuant to 22CFR216.2(c)(3), the originator of the proposed actions has determined that all activities under the Health project are fully within the following classes of action:

- Technical assistance and training programs - [22 CFR 216.2(c)(2)(i)].
- Analyses, studies, or academic workshops and meetings - [22 CFR 216.2(c)(2)(iii)].
- Document and information transfers - [22 CFR 216.2(c)(2)(v)].
- Programs involving nutrition, health care or population and family planning services, except to the extent designed to include activities directly affecting the environment (such as disposal of medical waste, etc.) - [22 CFR 216.2(c)(2)(viii)].

Negative Determination with Conditions

For other program activities that may have an adverse impact on environment, and pursuant to 22CFR 216.3(a)(2)(iii), Negative Determination with Conditions is recommended because those activities entail the disposal of equipment or material which, if not disposed of properly, could have a significant adverse impact on the environment. These activities include:

- General medical equipment, including vehicles, ventilators, infusion pumps, infant monitors, and diagnostic equipment;
- Medical supplies likely to be contaminated with blood or other body fluids, including sharps (this requires special protocol) catheters, bandages, sutures, syringes, and scalpels;
- Pharmaceuticals, including over-the-counter, and medications;
- Controlled substances; and
- Packaging materials.

Negative determinations on these activities carry with them the conditions that Implementing Partners (World Health Organization, U.S. Department of Health/Office of International and Refugee Health and others) will encourage, promote and monitor adherence to protocols concerning the proper handling, storage, use and disposal of these materials. World Health Organization, U.S. Department of Health/Office of International and Refugee Health will contact facility, local, oblast and national officials as appropriate, to design, implement and apply appropriate medical waste use, storage and disposal practices. World Health Organization, U.S. Department of Health/Office of International and Refugee Health will:

- Briefly examine the storage, use and disposal practices of each participating facility;
- Provide information, operational manuals, and training as appropriate;
- Assist facilities to strengthen medical waste use, storage and disposal practices; and
- Periodically monitor implementation of those practices.

USAID's Implementing Partners (World Health Organization, U.S. Department of Health/Office of International and Refugee Health and others) are expected to apply, at a minimum, practicable guidance found in Chapter 16: "Minimal programmes for health-care waste management," Safe Management of Wastes from Health Care Activities, Edited by A. Prüss, E. Giroult, P. Rushbrook. Geneva, World Health Organization, August 1999. Other resources that might be utilized include: WHO Healthcare Waste Management Handbook (September 1997 draft and as revised).

The Cognizant Technical Officer (CTO) will be responsible for the periodic monitoring of the environmental aspects of this program.

Revisions

USAID's Implementing Partners (World Health Organization, U.S. Department of Health/Office of International and Refugee Health and others) will advise the CTO if it is unable to meet these conditions. Pursuant to 22CFR216.3(a)(9), if new information becomes available that indicates that activities to be funded under this cooperative agreement might be "major" and the program's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer. If appropriate, an environmental assessment will be prepared.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

CLEARANCE:

A/ Mission Director, USAID/Russia: _____ Date: 2-16-01

Regional Environmental Officer, REO/WA: _____ Date: 2-16-01

M. A. LATIF

CONCURRENCE:

Bureau Environmental Officer: Carl J. Maxwell Date: 2/21/01

Approved: ✓

Disapproved: _____

OPTIONAL CLEARANCES::

Health Division Chief, Office of Social Sector Restructuring, USAID/Russia _____ Date: 2-16-01

Director, Office of Social Sector Restructuring, USAID/Russia _____ Date: 2/16/01

119

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY/SO DATA:

Country/Region:	RUSSIA
Program/Activity/SO Title:	SO3.2.a Improved Effectiveness of Selected Social Benefits and Services

1.0 BACKGROUND AND PROJECT DESCRIPTION

This program represents USAID's support for social sector transition in Russia, and the IEE covers 7 health program activities presented under sections 1.1 through 1.6a and 1.6b . As a result of this program, USAID and its contractors/grantees/recipients expect to reach the truly needy with improved health services. To achieve this objective, USAID program will promote the adoption of new approaches to service delivery, through:

- A number of workshops, seminars, conferences, internship and training programs;
- Studies and surveys conducted by USAID contractors/grantees/recipients;
- Brochures and books published for educational purposes;
- Delivery of office and laboratory equipment that is being used effectively and is well maintained;
- Supplies delivery and use as intended.

SO 3.2.a consists of the following activities (CTO in Russia/Moscow):

1.1 Women and Infant Health (WIN)
ACTIVITY DATA: 118-0004-00-0149

USAID's Implementing Partners: Prime Contractor - John Snow, Inc. and subcontractors - Johns Hopkins University, Center for Communication Programs, University Research Corporation, and Association for Voluntary and Safe Contraception International. Russian Partners are local medical facilities and health administrations/care providers and the Ministry of Health of the Russian Federation. Geographic location of the activity is Moscow, Novgorod and Perm oblasts of the RF.

The activity aims to reduce maternal and infant morbidity and mortality by improving the effectiveness of selected women and infant health services, with special emphasis on reducing repeat abortions and unwanted pregnancies, in selected sites. Specific focus areas include:

- family-centered maternity care;
- perinatal and newborn care;
- post-abortion and postpartum family planning counseling;
- integrating sexually-transmitted infections (STIs)/HIV counseling into family planning programs;
- micronutrients;
- adolescent reproductive health services;

- violence against women; and
- healthy life-styles.

Under this Contract, John Snow, Inc. provides services that include the following accomplishments:

- workshops on breastfeeding counseling and baby-friendly hospitals, reproductive health, family-centered maternity care (FCMC), essential new-born care;
- data collection and monitoring have been conducted for the staff of the project sites in Perm and Novgorod;
- both population and facility-based baseline surveys have been completed;
- a qualitative study of women's attitudes, knowledge and practices on breastfeeding and childbirth;
- a number of qualitative research studies on reproductive health and breast-feeding, which aim to inform the development of related information materials, were accomplished in Novgorod and Perm;
- a system of continuous training on breast-feeding and Baby-Friendly Hospital Initiative has been established in all facilities;
- the monitoring system, which is based on the project's monitoring indicators, was introduced in each project facility;
- 150,000 each of brochures on IUD, injectable and oral contraceptives, have been printed and shipped to the demonstration sites, as well as 2,000 sets of nine contraceptive cue cards;
- the book "Essentials of Contraceptive Technology" was translated and is currently being edited;
- a communication strategy on breast-feeding was developed.

1.2 World Health Organization (WHO) Tuberculosis (TB) Activities ACTIVITY DATA: 118-G-00-99-00112

A Grant with World Health Organization to provide support for a program on tuberculosis control in Russia in Orel, Ivanovo, and Vladimir oblasts, as well as activities at the federal level. US Implementing Partners: Centers for Disease Control and Prevention, Division of Tuberculosis Elimination (CDC-DTBE). Russian Partners: Russian Ministry of Health (MOH), Institute of Phthisiology and Pulmonology of the MOH, and Central TB Research Institute of the Russian Academy of Medical Sciences (CTRI).

Under the Grant WHO provides the following services:

- activity management, outreach, and follow-up services in the three oblasts;
- on-site monitoring, training and technical assistance;
- a sub-grant to a non-governmental organization (NGO) to provide social support services to TB patients and their families; and
- a logistical support framework and mechanism by which goods and services can be procured in support of activities in the three oblasts.

The TB Control activity is implemented by WHO by providing:

- office equipment and cars were delivered to Ivanovo in June and to Vladimir;
- procurement of essential laboratory equipment has been made with delivery to all three sites;
- all three sites are now implementing the "DOTS Protocol for Tuberculosis Demonstration Projects in Russia" issued in September and jointly developed by WHO, CDC, CTRI, Orel, and Ivanovo;
- incentive schemes for patients and staff were introduced in Ivanovo in June, resulting in a significant reduction of default rates.

1.3 PASA with U.S. Department of Health and Human Services (DHHS), Office of International and Refugee Health (OIRH)
ACTIVITY DATA: 118-P-00-98-00165

US implementing partners - U.S. Department of Health and Human Services (DHHS), Office of International and Refugee Health (OIRH); and agencies of DHHS: Centers for Disease Control and Prevention (CDC), Agency for Healthcare Research and Quality, and others. Russian Implementing Partners are Ministry of Health of the Russian Federation (MOH), Central Tuberculosis Research Institute (CTRI) of the Russian Academy of Medical Sciences, and SANAM (a Russian STDs NGO). Geographical location of the activity is scattered over the European part of Russia: Ivanovo, Orel, Vladimir, Tver, Tula, Novgorod oblast, Moscow City, and Saratov.

This activity supports priority areas identified by the Health Committee of the U.S. - Russian Commission on Economic and Technological Cooperation. Through a PASA with DHHS, USAID supports:
- technical assistance
- training
- information exchange

Under this Agreement, USAID's implementing partners provide services that include:
- a survey of high risk groups (the LIBRA study), including commercial sex workers, adolescents and homeless people, in order to provide data and information for targeted interventions;
- training for SANAM's interviewers has been provided as well as
- necessary equipment and reagents;
- CDC team conducted a feasibility study;
- CDC, in cooperation with Russian professionals, continues a congenital syphilis study in five regions of Russia;
- evidence-based clinical guidelines, redesigned systems of care and quality monitoring, and modern data-based quality management approaches are developed and in use;
- a representative from the Moscow Medical Academy (MMA) completed training in the theory and practice of evidence-based medicine (EBM) at Duke University;
- clinical support and expertise to the program in Orel and Ivanovo;
- CDC completed a drug resistance survey in Orel oblast (civilian and prison);

112

- assistance to the Ministry of Health in revision of the national surveillance system continued, resulting in changes in some national reporting forms which will be field tested in Novgorod oblast in early 2001

1.4 American International Health Alliance (AIHA) Health Partnerships ACTIVITY DATA: EE-A-00-98-00009-00

A Cooperative Agreement with American International Health Alliance (AIHA). Other US Implementing Partners: institutions from Lexington, Kentucky; Appleton, Wisconsin; Los Alamos, New Mexico; Houston, Texas; Des Moines, Iowa; and Bemidji, Minnesota. Russian Partners: regional and municipal health-care institutions in the locations scarred all over Russia.

This activity, which creates community-based primary health care partnerships between U.S. and Russian partners, incorporates a healthy community methodology that brings together all key community stakeholders in a collaborative health assessment and intervention process. Each of the partnerships:

- adapt and disseminate cost-effective preventive and curative techniques
- improve outcomes for the average citizen through enhancement of basic primary services

The activity encompasses: (a) seven community-based primary health care (PHC) partnerships and one partnership focused on infection control, (b) eleven one-year sustainability grants to qualified existing AIHA partners, which graduated in June 2000; and (c) several essential cross-cutting initiatives.

Under this Agreement, AIHA provides services on the partnerships activity that include:

- intensive exchange visits and in-country training provided by the US partners or organized by AIHA in collaboration with other agencies;
- Substance Abuse Prevention training for primary health care providers (in collaboration with SAMSHA and Dubna-La Cross partners);
- Domestic Violence workshop;
- Health Management training;
- Mental Health workshops;
- Clinical Guidelines seminars;
- In collaboration with another USAID-funded activity – Women and Infant Health – a series of training activities in the area of women's reproductive health and infant care
- Meeting of Emergency Medical Services training centers Directors to review their centers' curriculum;
- a Nursing leadership and association building conference;
- a series of information and communications technology workshops;
- a mid-term annual conference;
- several regional meetings, where Russia partnerships discussed issues of common importance;
- on October 2-4, 2000, AIHA organized a Russia-wide conference on Newborn Care and Neonatal Resuscitation that gathered about 120 neonatalogists and pediatricians from 79 regions of Russia.

1.5 Legal Regulatory Reform
ACTIVITY DATA: 118-A-00-98-00166-00

A Cooperative Agreement with Boston University Center for International Health (BU). Russian Partners: State Duma Health Protection Committee; Federal Fund for Compulsory Health Insurance; Russian Central Public Health Research Institute; Kaluga Oblast Health Care Administration; Kaluga Oblast Territorial Fund For Compulsory Health Insurance; Novgorod Oblast Administration; Moscow Oblast Health Administration; Samara Oblast Health Care Administration. The activity sites are Moscow, Moscow Oblast, Novgorod Oblast, Kaluga Oblast and Samara Oblast.

This legal reform activity provides technical support to regional and federal legislative bodies engaged in the drafting of health reform legislation and administrative regulations. The objective of this technical assistance is to support the codification of national and oblast-level health reform experiments into supporting legislation and regulatory acts.

This activity contributes to the achievements of SO 3.2.a by providing the following services:

- BU made three grants on the oblast-level projects in alternative forms of governance and organization in July 1999 to St. Petersburg Institute of Medical Social Research and Administration, the Moscow NGO "Family Doctor," and the Tula medical insurance company VerMed;
- Health Care draft law development in collaboration with Ministry of Health and the Ministry of Economics on the National Alternative Organizations;
- malpractice insurance regulations under the new Private Practice;
- technical assistance on drafting the Moscow Oblast appropriation law on Excess Capacity Lease Revenue in Health Care;
- collecting data on the impact that a St Petersburg experiment has on reducing the number of hospitalization.

1.6 Assistance to Russia Orphans (ARO)
ACTIVITY DATA: 118-A-00-99-00105 and 118-A-00-99-00106

A Cooperative Agreement with Holt International Children's Services and a Cooperative Agreement with Mercy Corps International. The other Implementing Partners: Charities Aid Foundation (CAF) and European Children's Trust (ECP) and World Association of Children and Parents (WACAP). Russian Partners: child welfare NGOs in Regional Initiative (RI) sites and other Russian regions. Regions: Western Russia including Tomsk (*Holt International*); Primorskii Krai and Magadan (*Mercy Corps*).

This activity promotes community-based family-centered services to improve the current state of Russian orphans. Specifically, the project will help:

- prevent child abandonment and institutionalization
- develop community-based assistance for orphans, including disabled and older orphans; and

- promote networking and sharing of lessons learned.

The two consortia provide training and technical assistance to Russian non-governmental organizations (NGOs), manage grants programs, and monitor and evaluate the overall ARO activity.

Under this CA Holt International (ARO/West) provides services that include:

- conducting of three rounds of grant competition for Service Delivery resulting in 23 successful grant recipients from 12 different regions across Russia to provide services in abandonment prevention, family-based alternatives to institutionalization, and in social integration of older orphans, promotion of children rights protection practices;
- maintenance a database of over 600 international and Russian child welfare organizations;
- social work training for 120 current and potential grantees in abandonment prevention, social integration, and individual case work;
- conduction of 8 seminars in Tomsk, Novgorod, Samara, and Nizhni Novgorod regions to increase cooperation of governmental and non-governmental sectors and help local NGOs develop their projects;
- the seminars in Novgorod oblast that resulted in a large-scale project of early intervention services for children with special needs;
- training in abandonment prevention under request from the Tomsk Regional Social Welfare and Administration authorities;
- a three-week U.S.-based training on services and practices of orphans prevention sponsored through USAID's Training for Development (TFD) Program for the representatives of nine child welfare organizations in Tomsk, Novgorod and Arzamas;
- conduction of grant competitions on a quarterly basis;
- two large comprehensive social work seminars for 100 government and NGO service in the Tomsk region;
- selected Tomsk social work providers recruited through a competitive process will receive social work internships with the stronger ARO program grantees
- regional social service development seminars in the regions of Moscow and Arzamas

Under this CA Mercy Corps (ARO/East) provides services that include:

- conducting of the first and second grant competitions for Service Delivery in Primorskii Krai and Magadan;
- grants to Nine NGOs from five different regions to provide services to families at risk, and abandoned and institutionalized children;
- a joint grant round for Primorskii Krai and Magadan;
- basic social work and NGO development training for all grantees and their government counterparts;
- a three-week U.S.-based training on services and practices of orphans prevention sponsored through USAID's Training for Development (TFD) Program for the representatives of four grant recipient organizations in Primorskii Krai and Magadan
- quarterly networking roundtables with the grantees and community stakeholders;
- selected participants from both regions traveling to Russian model projects to learn about child-centered, community-based services

125

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION

The agreements under which the Health Program Implementing Partners operate, authorize activities throughout the Russian Federation. In general, there is little awareness of or concern about medical waste, either at the facility, local, oblast or national levels in Russia. Although Russia has medical waste legislation and offers some training in the handling and disposal of medical waste, it does not have the appropriate disposal equipment and infrastructure. Usually, infectious and hazardous medical wastes are mixed with municipal waste, without controlling or restricting access to the disposal area. This lack of awareness and procedures can prove hazardous to both public health and the environment. A typical example could be increased rates of hepatitis B & C and HIV among healthcare workers and patients, due to improper handling and disposal of used syringes. See attached list of relevant Russian laws and regulations.

3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

The general principles underlying this IEE are that the USAID's Health Program Implementing Partners will ensure that the consequences of the program are identified and considered, and that appropriate procedures and safeguards are put in place to ensure the proper storage, use and disposal of program-provided equipment, pharmaceuticals and supplies.

Activities dealing with technical assistance, training, analyses, studies, academic workshops and meetings, document and information transfers, programs involving nutrition, health care of population, and family planning services have no adverse impact on the environment, except to the extent designed to include activities directly affecting the environment (such as disposal of medical waste, etc.). However, activities dealing with providing general medical equipment, including ventilators, infusion pumps, infant monitors, diagnostic equipment, and medical supplies likely to be contaminated with blood or other body fluids, sharps (this requires special protocol), catheters, bandages, sutures, syringes, and scalpels; pharmaceuticals, over-the-counter, and legend medications; and controlled substances.

Russian laws and regulations for environmental protection and management will be followed in implementing the activities, unless specified otherwise.

4.0 RECOMMENDED MITIGATION ACTIONS

No mitigation is required for activities falling under Categorical Exclusion. However, for activities having a Negative Determination with Conditions, the following mitigation measures will be followed.

A negative determination in the case of packaging materials used in provision of equipment or supplies is provided for under USAID Environmental Procedures 22 CFR Part 216, Section 216.3 (a) (2), iii, since the design of the project is such that it is self-mitigating. Some solid waste will be generated from the packaging materials used in shipping equipment and supplies

to the host countries. However, the amount of packaging material, which accounts for only a small percentage of the total net-weight of each shipment, will be minimized by shipment directly to the intended user rather than an interim warehousing facility. In addition, wooden pallets are reusable if undamaged and are biodegradable when discarded. Cardboard boxes are also recyclable and biodegradable. Consequently, no significant environmental impact is expected from packaging materials used in shipment.

For other program activities (and pursuant to 22CFR 216.3(a)(2)(iii)), Negative Determinations with Conditions are recommended because those activities entail the disposal of equipment or material which, if not disposed of properly, could have a significant adverse impact on the environment. These activities include:

- General medical equipment, including ventilators, infusion pumps, infant monitors, and diagnostic equipment;
- Medical supplies likely to be contaminated with blood or other body fluids, including sharps (this requires special protocol).catheters, bandages, sutures, syringes, and scalpels;
- Pharmaceuticals, including over-the-counter, and legend medications;
- Controlled substances.

The operational conditions underlying this IEE include the following:

1. USAID's Implementing Partners (WHO, DHHS/OIRH, and others) will encourage, promote and monitor adherence to protocols concerning the proper handling, storage, use and disposal of these materials. They will contact facility, local, oblast and national officials as appropriate, to design, implement and apply appropriate medical waste use, storage and disposal practices:

- Briefly examine the storage, use and disposal practices of each participating partnership facility;
- Provide information, operational manuals, and training as appropriate;
- Assist facilities to strengthen medical waste use, storage and disposal practices; and
- Periodically monitor implementation of those practices.

2. USAID's Implementing Partners (WHO, DHHS/OIRH, and others) are expected to apply, at a minimum, practicable guidance found in Chapter 16: "Minimal programmes for health-care waste management," Safe Management of Wastes from Health Care Activities, Edited by A. Prüss, E. Giroult, P. Rushbrook. Geneva, World Health Organization, August 1999. Other resources that might be utilized include:

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3. Periodic monitoring of the environmental aspects of this program by EE/EEST (ENR and HRHA).

5.0 SUMMARY OF FINDINGDS

Activities by USAID's Implementing Partners will promote the adoption of new approaches to resource management and service delivery, through: training and technical assistance on maternal and child health; development of improved responses to infectious diseases, specifically tuberculosis and HIV/AIDS. US-Russian partnerships will also increase access to primary health care.

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Negative Determination with Conditions

For other program activities that may have an adverse impact on environment, and pursuant to 22CFR 216.3(a)(2)(iii), Negative Determination with Conditions is recommended because those activities entail the disposal of equipment or material which, if not disposed of properly, could have a significant adverse impact on the environment. These activities include:

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- Medical supplies likely to be contaminated with blood or other body fluids, including sharps (this requires special protocol) catheters, bandages, sutures, syringes, and scalpels;
- Pharmaceuticals, including over-the-counter, and legend medications;
- Controlled substances; and
- Packaging materials.

Negative determinations on these activities carry with them the conditions that Implementing Partners (World Health Organization, U.S. Department of Health/Office of International and Refugee Health and others) will encourage, promote and monitor adherence to protocols concerning the proper handling, storage, use and disposal of these materials. World Health Organization, U.S. Department of Health/Office of International and Refugee Health will contact facility, local, oblast and national officials as appropriate, to design, implement and apply appropriate medical waste use, storage and disposal practices. World Health Organization, U.S. Department of Health/Office of International and Refugee Health will:

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The Cognizant Technical Officer (CTO) will be responsible for the periodic monitoring of the environmental aspects of this program.

Revisions

Activities by USAID's Implementing Partners (WHO, DHHS/OIRH, and others) will advise the CTO if it is unable to meet these conditions. Pursuant to 22CFR216.3(a)(9), if new information becomes available that indicates that activities to be funded under this Health Project might be "major" and the program's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer. If appropriate, an environmental assessment will be prepared.

6 USE OF ENVIRONMENTAL PROCEDURES

All work in connection with disposal of infected materials in health care facilities providing medical help to TB and HIV patients shall be done in strict compliance with formal rules, such as:

1. Order of the USSR MOH No. 288 dated 31.07.78 "Guidelines for Sanitary and Anti-Epidemic Regulation in Hospitals"
2. Order of the USSR MOH No. 916 dated 04.08.83 "On Approval of Guidelines for Sanitary and Anti-Epidemic Regulation Staff Safety in Infection Hospitals (Sections)"
3. "Methodic Guidelines for Classification of TB Iinfection Nidi, TB Disinfection Activities and Quality Control of the Same". Approved by USSR MOH on 04.05.79 T 1980-79
4. OST 42-21-2-85 "Medical Supplies Sterilization and Disinfection. Methods, Resources, Regulations"
5. "Methodic Guidelines for Disinfection, Pre-Sterilization Treatment and Sterilization of Medical Supplies" Approved by MOH on 03.12.98 No. MU-287-113
6. "Sanitary Rules and Norms 2.1.7.728-99 "Rules of Collection, Storage and Disposal of Wastes in Healthcare Facilities". Approved by MOH on 22.01.99.

ENVIRONMENTAL COMPLIANCE
FACESHEET

INITIAL ENVIRONMENTAL EXAMINATION
AND
CATEGORICAL EXCLUSION

Title of Activity/Activity Number: Environmental Action Programme Support (EAPS) Project Macedonia, DHR-C-00-95-00034-00

Country/Region: Macedonia/E&E

Funding Period: FY 99 - FY 00

Statement Prepared by: Dr. Robert Reid, USAID/Macedonia

IEE Amendment (Y/N)? N

Environmental Media and/or Human Health Potentially Impacted (check all that apply):

air X *water* X *land* X *biodiversity (specify)*____ *human health* _____ *other* _____ *none* _____

Environmental Action(s) Recommended (check all that apply):

X 1. Categorical Exclusion(s)

X 2. Initial Environmental Examination:

X *Negative Determination*: no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:

____ without conditions (no special mitigation measures needed; normal good practices and engineering will be used)

X with conditions (special mitigation measures specified to prevent unintended impact)

____ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.

____ conditions agreed to regarding appropriate prices of environmental capacity building and screening, mitigation, and monitoring

____ *Positive Determination:* IEE confirms potential for significant adverse effect

131

_____ EA to be/ being/ has been (circle one) conducted. Note that the activities affected cannot go forward until the EA is approved.

_____*Deferral*: one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved. Briefly describe the nature of the deferred activities:

Summary of Findings:

Activities 1, 3, 4 & 5

EAPS Macedonia project activities 1, 3, 4 and 5, as described in section 1.0 of the attached Initial Environmental Examination are entirely within one of the categories listed in paragraph (c)(1), "Categorical Exclusions," of Section 216.2, "Applicability of Procedures" of 22 CFR 216 "USAID Environmental Procedures." Pursuant to 22 CFR 216(c)(3), the originator of the proposed action has determined that the activities are fully within the following classes of actions:

1. **Development of the Fund's Project Pipeline:** Education, technical assistance, or training programs [22 CFR 216.2(c)(2)(i)]
3. **Institutional Strengthening of the Fund:** Education, technical assistance, or training programs [22 CFR 216.2(c)(2)(i)]
4. **Developing Industrial Environmental Project Case Studies:** Analyses, studies, academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)]
5. **Recycling Project Feasibility Study:** Analyses, studies, academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)]

Pursuant to 22 CFR 216.2(c)(2), the EAPS Macedonia project activities 1, 3, 4 and 5 as listed above are categorically excluded from further environmental review. As per 22 CFR 216.2(c)(1), neither an initial environmental examination nor an environmental assessment is required for an action which is determined to fall within one or more of the categories listed at 22 CFR 216.2(c)(2).

Activity 2

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project recommends a negative determination of significant environmental effect for the Co-financing Environmental Investment Projects activity of the EAPS Macedonia project. Request the EE Bureau Environmental Officer approval of a negative threshold decision for these activities contingent on the application of the mitigating measures presented in Section 4.

132

Title of Activity/Activity Number: Environmental Action Programme Support (EAPS) Project Macedonia, DHR-C-00-95-00034-00

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

A/Mission Director: X _____ Date: 10-23-2000

Concurrence:

Bureau Environmental Officer: Carl Z. Maxwell Date: 10/26/2000

Approved: X

Disapproved: _____

Optional Clearances:

Mission Environmental Officer: _____ Date: _____

General Counsel: _____ Date: _____

133

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/PROJECT DATA:

Program Number:	DHR-C-00-95-00034-00
Country/Region:	Macedonia/E&E
Title of Program/Activity/Project:	Environmental Action Programme Support (EAPS) Project

1.0 BACKGROUND AND PROJECT DESCRIPTION

In 1998 the Macedonian government established the Fund for Environment and Nature Protection and Promotion in Macedonia (Fund) as a source of financing for environmental investments for local governments and private industries to help leverage domestic and foreign resources to improve the nation's environment. The EAPS project was established by USAID in Macedonia in 1998 to assist in the development of the Fund as an effective, transparent financial institution capable of providing financing to local administrations and industries for environmental protection and pollution prevention.

It is largely the responsibility of local institutions in Macedonia to finance investments in environmental protection and pollution prevention. At the same time, these local administrations and institutions lack the resources in their own budgets to improve environmental infrastructure. Moreover, they also lack the know-how to identify and prepare environmental projects for outside financing. EAPS work directly supports both the capacity of the Fund as an institution and the capacity of local entities to identify and prepare projects that can meet the Fund's criteria for financing and improve environmental management and performance in Macedonia.

EAPS work consists of the following five primary activities:

1. **Development of the Fund's Project Pipeline.** EAPS works closely with the Director and staff of the Fund to identify, screen, and prepare technical and financial documentation for environmental projects that are suitable for financing by the Fund.
2. **Co-financing of Environmental Projects.** USAID, through the EAPS project, and the Fund is providing co-financing for environmental infrastructure projects to local governments whose territories were impacted by the 1999 Kosovo refugee crisis. Five projects valued from $150,000 - $400,000 each will be financed.
3. **Institutional Strengthening of the Fund.** EAPS assists the Fund to develop as a transparent and effective financing institution with a sustainable source of revenue through hands-on technical assistance with daily activities, assistance to prepare a Law to govern the Fund as an independent institution, and specialized workshops and study tours for the Fund Director and staff.

4. **Developing Industrial Environmental Project Case Studies.** EAPS is conducting case studies and follow-up workshops at two large Macedonian industries to identify key opportunities for environmental investment as a basis for attracting funding from donors and international financial institutions and private commercial entities.
5. **Recycling Project Feasibility Study.** EAPS is conducting a detailed feasibility study for the collection and recycling of plastic containers and aluminum cans for the Pivara Skopje brewery.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Macedonia is a former republic of the Yugoslav Federation; the country officially declared independence in 1992. It is bordered by Kosovo and Serbia on the North, Bulgaria on the West, Albania on the East, and Greece on the South. The population is approximately 2 million and the capital is Skopje, a city of approximately 600,000. Approximately 66% of the country's population are Macedonians, 25% ethnic Albanians, and the rest predominantly Roma, Serbs, and Turks. Macedonia received over 200,000 ethnic Albanian refugees from Kosovo during the 1999 conflict; the majority of these were housed in camps in the northwestern part of the country, and in ethnic Albanian villages. It is estimated that 85-90 percent of these refugees have returned to Kosovo to date.

Much of Macedonia is a plateau between 600m and 900m high. The Vardar River cuts across the middle of the country, passing the capital, Skopje, on its way to the Aegean Sea near Thessaloniki, Greece. Ohrid and Prespa lakes in the southwest drain into the Adriatic via Albania. These lakes are among the largest on the Balkan Peninsula, and Ohrid Lake is the deepest. In the northwest, the Sar Planina mountain marks Macedonia's border with Kosovo; Titov vrh (2750m/9010ft) in this range is Macedonia's highest peak.

Macedonia's summers are hot and dry. In winter, warm Aegean winds blowing up the Vardar Valley moderate the continental conditions prevailing further north. However, Macedonia receives a lot of snowfall between November and February, even if temperatures are warmer than those further north.

3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

The only one of the five EAPS project activities described in Section 1.0 above which has the potential to have a negative impact on the environment is **Activity 2, Co-financing of Environmental Projects.** EAPS will work with the Fund and local government authorities to prepare and provide financing for the implementation of five environmental infrastructure projects in Macedonia. The projects will be implemented by Macedonian construction firms selected by the project proponents (local government entities), with assistance from EAPS and the Fund, according to the Macedonia Law for Public Procurements. The local firms will be supervised by the project proponents, with

135

further supervision from the EAPS contractor Chemonics International Inc. and the Fund staff.

The projects selected by EAPS and the Fund for co-financing are small-scale municipal infrastructure projects, ranging from approximately $150,000 - $400,000 each. The sectors addressed are wastewater treatment and sewerage, and the fuel conversion of heating facilities from oil to natural gas. Many of the projects involve the repair and/or upgrading of existing facilities rather than new construction.

A brief description of the co-financing projects follows:

1. **Boiler Conversion to Natural Gas at Skopje Public Transportation Company (JSP):** The project will convert the primary fuel used to generate heating power from heavy oil to natural gas, install a central heating control system, and replace blower heaters in the vehicle repair buildings with infrared radiant heating. The project will result in significant reduction of air emissions due to the switch to a cleaner burning fuel. **Total Cost: $150,000**

2. **Sewer System for Lagadin Village, Ohrid Lake:** This project involves the construction of a sewer network to connect Lagadin Village to the main sewer along Lake Ohrid. The project will result in reduction of water pollution from the village to Lake Ohrid. **Total Cost: $135,000**

3. **Rehabilitation of Wastewater Treatment Plant, Sveti Nikole:** This project involves the redesign and reconstruction of the existing wastewater treatment plant for the Municipality of Sveti Nikole. The project will improve the efficiency of the wastewater treatment plant and reduce water pollution to surrounding rivers. **Total Cost: $250,000**

4. **Rehabilitation of Wastewater Treatment Plant, Star Dojran:** This project involves the redesign and reconstruction of the existing wastewater treatment plant and pump stations for the Municipality of Star Dojran. The project will improve the efficiency of the wastewater treatment plant and reduce water pollution to Lake Dojran. **Total Cost: $300,000**

5. **Sewer System and Wastewater Treatment Plant, Zelenikovo:** This project will construct a sewer system and small, modular wastewater treatment plant for the Village of Stanica Zelenikovo, with a capacity for 2000 citizens. The project will reduce water pollution to the Vardar River. **Total Cost: $400,000**

These small-scale projects are not expected to have significant negative effects on the environment. In fact, the projects will all result in significant benefits to the environment. However, because there is construction involved in the implementation of these projects, mitigating actions are built into the project design to negate the following potential effects on the environment:

136

1. Sewer system construction requires proper disposal of excavated material.
2. The two sewer system construction projects are located within 30m of a river, stream, or lake; excavation and construction could introduce excavated material and construction debris to these bodies of water.
3. Sewer system construction near a river presents potential flood hazards.
4. The construction of a sewer network connected to an existing sewerage and treatment system could potentially overload the existing wastewater treatment plant.
5. Construction sites present potential hazards to the safety of both construction workers and others in the area.
6. Construction activities create increased noise and airborne dust.

Mitigating actions presented in the following section are proposed to ensure that environmental concerns are taken into account during both the design and construction phases of the projects.

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project has reviewed the potential environmental impacts of the action summarized in the foregoing IEE. It has been determined that the Co-financing of Environmental Investment Projects component of the EAPS project, if implemented as described, will not have a significant negative impact on the environment. The construction and reconstruction of sewer systems, wastewater treatment plants, and conversion to natural gas for heating would only result in beneficial effects on the living conditions and environment of Macedonia. Construction contractors will be required to take measures during construction activities to reduce the potential environmental effects described above.

Environmental Analyses

To ensure compliance with USAID environmental procedures, the EAPS Contractor will prepare an analysis of each co-financing project, based on the attached Environmental Assessment Checklist, which will be used to identify the aspects of the projects that may have significant environmental impacts. When the analysis indicates that negative environmental impacts may occur then the project will be designed to avoid or mitigate these impacts. In particular, when appropriate the EAPS Contractor should address:

1. Debris Disposal: by requiring construction contractors to dispose of debris at appropriate sites as approved by Macedonian authorities and stated in the construction permit required for each project.
2. Floodplains: The Lagadin sewer system is designed to be constructed at a height above the flood hazard area. For Zelenikovo, historical flood data was requested for the project engineering design and the waste water treatment plant and sewer system outlet will be constructed at levels above the portion of the floodplain that is inundated by the 25-year flood.

137

3. Addition of incremental sewer network: the existing waste water treatment plant is designed to handle loads from all the settlements around Ohrid Lake, including the Village of Lagadin.
4. Safety: by assuring that construction contracts include clauses addressing the safety of both contractor personnel and the public.

Monitoring

The environmental status of each project will be reviewed periodically during implementation by means of routine site visits by EAPS Project staff. All construction projects will be monitored and documented on a daily basis by a Supervising Engineer; this documentation will be required from the construction contractor by the EAPS Contractor and the Macedonian Environmental Fund with every request for payment. Copies of environmental checklists and analyses prepared by the EAPS Contractor and construction site monitoring reports will be kept on file and will be provided to USAID for review and monitoring purposes.

5.0 SUMMARY OF FINDINGS

Environmental Determination

Activities 1, 3, 4 and 5

EAPS Macedonia project activities 1, 3, 4 and 5, as described in section 1.0 of this document are entirely within one of the categories listed in paragraph (c)(1), "Categorical Exclusions," of Section 216.2, "Applicability of Procedures" of 22 CFR 216 "USAID Environmental Procedures." Pursuant to 22 CFR 216(c)(3), the originator of the proposed action has determined that the activities are fully within the following classes of actions:

1. **Development of the Fund's Project Pipeline:** Education, technical assistance, or training programs [22 CFR 216.2(c)(2)(i)]
3. **Institutional Strengthening of the Fund:** Education, technical assistance, or training programs [22 CFR 216.2(c)(2)(i)]
4. **Developing Industrial Environmental Project Case Studies:** Analyses, studies, academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)]
5. **Recycling Project Feasibility Study:** Analyses, studies, academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)]

Pursuant to 22 CFR 216.2(c)(2), the EAPS Macedonia project activities 1, 3, 4 and 5 as listed above are categorically excluded from further environmental review. As per 22 CFR 216.2(c)(1), neither an initial environmental examination nor an environmental assessment is required for an action which is determined to fall within one or more of the categories listed at 22 CFR 216.2(c)(2).

Activity 2

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project recommends a negative determination of significant environmental effect for the Co-financing Environmental Investment Projects activity of the EAPS Macedonia project. Request the EE Bureau Environmental Officer approval of a negative threshold decision for these activities contingent on the application of the mitigating measures presented in Section 4.

REVISIONS

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant", this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

ENVIRONMENTAL ASSESSMENT CHECKLIST

The purposes of this *Environmental Assessment Checklist (EA Checklist)* are to determine whether the proposed action (scope of work) encompasses the potential for environmental pollution or damage and, if so, to determine the scope and extent of additional environmental evaluation, mitigation, and monitoring necessary to fulfill federal U.S. environmental requirements. The *EA Checklist* is intended to be used in conjunction with a brief Project Description prepared by the Project Engineer.

ENVIRONMENTAL CONSEQUENCES: Check appropriate column as Yes (Y), Maybe (M), No (N) or Beneficial (B). Briefly explain Y, M and B checks in next Section, "Explanations". A "Y" response does not necessarily indicate a significant effect, but rather an issue that requires focused consideration,

	Y, M, N or B
1. Earth Resources	
a. grading, trenching, or excavation > 1.0 hectare	___
b. geologic hazards (faults, landslides, liquefaction, unengineered fill, etc.)	___
c. contaminated soils or ground water on the site	___
d. offsite overburden/waste disposal or borrow pits required > 1.0 ton	___
e. loss of high-quality farmlands > 10 hectares	___
2. Air Quality	
a. substantial increase in onsite air pollutant emissions (construction/operation)	___
b. violation of applicable air pollutant emissions or ambient concentration standards	___
c. substantial increase in vehicle traffic during construction or operation	___
d. Demolition or blasting for construction	___
e. substantial increase in odor during construction or operation	___
f. substantial alteration of microclimate	___
3. Water Resources and Quality	
a. river, stream or lake onsite or within 30 meters of construction	___
b. withdrawals from or discharges to surface or ground water	___
c. excavation or placing of fill, removing gravel from, a river, stream or lake	___
d. onsite storage of liquid fuels or hazardous materials in bulk quantities	___
4. Cultural Resources	
a. prehistoric, historic, or paleontological resources within 30 meters of construction	___
b. site/facility with unique cultural or ethnic values	___
5. Biological Resources	
a. vegetation removal or construction in wetlands or riparian areas > 1.0 hectare	___
b. use of pesticides/rodenticides, insecticides, or herbicides > 1.0 hectare	___

140

c. Construction in or adjacent to a designated wildlife refuge ___

6. **Planning and Land Use**
   a. potential conflict with adjacent land uses ___
   b. non-compliance with existing codes, plans, permits or design factors ___
   c. construction in national park or designated recreational area ___
   d. create substantially annoying source of light or glare ___
   e. relocation of >10 individuals for +6 months ___
   f. interrupt necessary utility or municipal service > 10 individuals for +6 months ___
   g. substantial loss of inefficient use of mineral or non-renewable resources ___
   h. increase existing noise levels >5 decibels for +3 months ___

7. **Traffic, Transportation and Circulation**
   a. increase vehicle trips >20% or cause substantial congestion ___
   b. design features cause or contribute to safety hazards ___
   d. inadequate access or emergency access for anticipated volume of people or traffic ___

8. **Hazards**
   a. substantially increase risk of fire, explosion, or hazardous chemical release ___
   b. bulk quantities of hazardous materials or fuels stored on site +3 months ___
   c. create or substantially contribute to human health hazard ___

EXPLANATION: explain Y, M and B responses

RECOMMENDED MITIGATION MEASURES

RECOMMENDED ACTION (Check Appropriate Action):

(a) The project has no potential for substantial adverse environmental effects. No further environmental review is required.
(b) The project has little potential for substantial adverse environmental effects, however the recommended mitigation measures (listed above) will be incorporated in the SOW. No further environmental review is required.

141

(c) The project has substantial but mitigatable adverse environmental effects and required measures to mitigate environmental effects (listed above) will be included in the SOW.
(d) The project has potentially substantial adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared.
(e) The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required.
(f) The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

APPROVAL

Project Director _____

Date _____

INITIAL ENVIRONMENTAL EXAMINATION & ENVIRONMENTAL COMPLIANCE FACESHEET

Title of Project/ Project Number:	FOREST	
Country/Region:	E&E/Russia	
Funding Period:	August, 2000-August, 2005.	
Resource Levels/Amount(s):	$ 20 Million	
Statement Prepared by:	Lyudmila Vikhrova/ Alicia Grimes Mohammad Latif	Date: 10/25/00 Date: 02/17/01

IEE Amendment (Y/N): N **Date of Original IEE:** n/a

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
*air*_x__ *water*_x__ *land*__x__ *biodiversity* (specify)__x__ *human health*___x_ *other*____ *none*_____

Environmental Action(s) Recommended (check all that apply):

__X_ 1. *Categorical Exclusion*(s)

__X__ 2. Initial Environmental Examination:

__X_ *Negative Determination*: no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:
___ without conditions (no special mitigation measures needed; normal good Practices and engineering will be used)
__X_ with conditions (special mitigation measures specified to prevent unintended impact)

__X_ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.
__X__ conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

__X_ *Positive Determination*: IEE confirms potential for significant adverse effect of
__X_ EA to be / being / has been (circle one) conducted. Note that the activities affected cannot go forward until the EA is approved.

___*Deferral:* one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved. Briefly describe the nature of the deferred activities: _small grants and loans_____

Summary of Findings:

Project Components: The Forestry Resources and Technologies (FOREST) Project consists of five components- four technical components and a cross cutting component to cover three discrete sub-components dealing with Forest Policy and Legal Reform, Applied Forest Research, and Forestry Grant/Loan issues. The five components will include providing technical assistance, research, training and grants to Russian partners to achieve the overall project goals of reducing the threat of global climate change and to preserve biodiversity through promotion of sustainable forest management. The FOREST project will be implemented through a cooperative agreement over a five-year period. The five project components are summarized as follows:

1. **Forest Fire Prevention:** Activities under this project component will include a mass media campaign and more focused campaigns at the local level is to reduce the number of man-made forest fires through increased awareness and concern among targeted populations.

2. **Pest Management:**. Activities under this project component will entail developing baseline information on previous pest outbreaks; establishment of a pheromone trapping grid for outbreak prediction and pest population monitoring, and development of strategy for preventing large-scale insect pest outbreaks.

3. **Non-Timber Forest Products and Secondary Wood Processing:** Activities under this project component will support sustainable economic growth in non-timber forest product and wood processing sectors by strengthening associations to better serve the needs of their constituencies.

4. **Renewable Energy Alternatives:** Activities under this project component will develop appropriate biomass technologies to meet industrial, commercial and large residential needs to integrate renewable energy into the Russian Energy System.

5. **Cross cutting component:** The four technical components presented earlier will be supported by the following three cross-cutting project sub-components :
    a. Forest Policy and Legal Reform
    b. Applied Forest Research
    c. Forestry Grant/Loan Program

Environmental Review Findings: The findings under Categorical Exclusions of 22 CFR 216.2 are not applicable to assistance for the procurement or use of pesticides or similar chemicals. In such situations, Pesticides Procedures cited under 22 CFR 216.3 (b) will be followed by the project implementor unless an Environmental Assessment covering a response to 22 CFR 216.3 (b) requirements has been prepared and duly approved by the Bureau Environmental Officer (BEO).

The proposed action, to be undertaken for the FOREST project activities under <u>Project Components 1, 5a and 5b</u>, and **<u>portion of activities under Project Components 3 and 4</u>**, involving technical assistance, training, research and stakeholder participation through workshops, is entirely within the classes of action cited in Title 22 of the Code of Federal Regulations (CFR) Section 216.2, (Applicability of Procedures) paragraph (c)(2), [22CFR216.2(c)(2)] and therefore, are categorically excluded. Pursuant to 22CFR216.2(c)(3), the originator of the proposed actions has determined that such activities under the FOREST project are fully within the following classes of action:

Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction) [22 CFR 216.2(c)(2)(i)].

Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored [22 CFR 216.2(c)(2)(ii)].

Analyses, studies, academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)].
<u>For Project Component 2 activities related to pest management and/or the procurement or use of pesticides or other chemicals</u>, Pesticides Procedures cited under 22 CFR 216.3 (b) will be followed by the project implementor (i.e., a Negative Determination with Conditions unless an Environmental Assessment (i.e., a Positive Determination) covering a response to 22 CFR 216.3 (b) requirements has been prepared and duly approved by the Bureau Environmental Officer (BEO).

For project component 3 and a pilot sub-activity of rest areas for component 1 activities, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a Negative Determination with conditions requiring preparation of a check list by the implementor similar to the one attached to this IEE. This activity will support marketing of non-timber forest products which are not managed sustainably or which are restricted by CITIES, and increasing efficiency of wood processing to sustainable harvesting.

For project component 4, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a **negative determination (with conditions)** of significant environmental effect of the activities. The originator requests that the E&E/ BEO approve a negative threshold decision for those activities contingent on the use of the review, monitoring, and mitigation measures discussed in Section 4. Under this component, environmental improvement measures will include introduction of biomass and other relevant technologies.

For cross cutting sub-component 5c activities, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a **negative determination (with conditions)** of significant environmental effect for sub-component 5c activities. The originator requests that the E&E/ BEO approve a negative threshold decision for those activities contingent on the use of the review, monitoring, and mitigation measures discussed in Section 4. At present, the specific details of activities to be supported by grants is not known, however, based on our previous experience, grants might include support for infrastructure in nature reserves, procurement of forestry or biomass equipment, forest pest research.

Revisions:

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant", this determination will be reviewed and revised by the originator of the project and submitted to the E&E Bureau Environmental Officer for approval and, if appropriate, an environmental assessment will be prepared.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

A/ Mission Director: _____ Date: 2/22/01

Regional Environmental Officer (REO)/WBC ~~[illegible]~~ M.A. LATIF Date: 2-22-01

Concurrence:

Bureau Environmental Officer: Carol F. Maxwell Date: 2/26/01

Approved: ✓

Disapproved: _____

Optional Clearances:

Mission Environmental Officer: Carol Rivitoff Date: 2/21/01

For project component 3 and a pilot sub-activity of real areas for component 1 activities, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a Negative Determination with conditions requiring preparation of a check list by the implementator similar to the one attached to this IEE. This activity will support marketing of non-timber forest products which are not managed sustainably or which are restricted by CITIES, and increasing efficiency of wood processing to sustainable harvesting.

For project component 4, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a negative determination (with conditions) of significant environmental effect of the activities. The originator requests that the E&E/ BEO approve a negative threshold decision for those activities contingent on the use of the review, monitoring, and mitigation measures discussed in Section 4. Under this component, environmental improvement measures will include introduction of biomass and other relevant technologies.

For grant making sub-component 5c activities, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a negative determination (with conditions) of significant environmental effect for sub-component 5c activities. The originator requests that the E&E/ BEO approve a negative threshold decision for those activities contingent on the use of the review, monitoring, and mitigation measures discussed in Section 4. At present, the specific details of activities to be supported by grants is not known, however, based on our previous experience, grants might include support for infrastructure in nature reserves, procurement of forestry or biomass equipment, forest pest research.

Revisions:

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant", this determination will be reviewed and revised by the originator of the project and submitted to the E&E Bureau Environmental Officer for approval and, if appropriate, an environmental assessment will be prepared.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

Mission Director: _____ Date: 2/22/01

Regional Environmental Officer (REO)/WRC: M.A. LATIF Date: 2-22-01

Concurrence:

Bureau Environmental Officer: Carl J. Manaresi Date: 2/26/2001

Approved: ✓

Disapproved: _____

Optional Clearances:

Mission Environmental Officer: _____ Date: 2/21/01

146.

INITIAL ENVIRONMENTAL EXAMINATION (IEE)

Project Data:

Project Number: 110-0003
Country/Region: Russia
Activity Title: Forestry Resources and Technologies (FOREST)

1. BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose and Scope of the IEE

The purpose of this IEE is to respond to the requirements of the Agency (i.e., USAID) Environmental Procedures (i.e., 22 CFR 216) and Agency Automated Directives System (ADS) 201 and 204 requirements. The scope of the IEE includes preparation of Regulation 216 documentation pertaining to an environmental review of the activities of FOREST Project Components. This includes threshold decisions on discrete activities and conditions for implementation where appropriate. The IEE will also serve as the overall frame and starting point to guide USAID and its partners in complying with the agency's environmental regulations. The Scope of this IEE has been developed to be consistent with the structure of the FOREST project.

For Project Component 2 activities related to pest management and/or the procurement or use of pesticides or other chemicals, Pesticides Procedures cited under 22 CFR 216.3 (b) will be followed by the project implementor (i.e., a Negative Determination with Conditions unless an Environmental Assessment (i.e., a Positive Determination) covering a response to 22 CFR 216.3 (b) requirements has been prepared and duly approved by the Bureau Environmental Officer (BEO).

For a project component 3 involving Non-Timber Forest Products and Secondary Wood Processing, a sample Environmental Assessment Checklist is attached as a guide to the project implementor to prepare an appropriate Environmental Assessment Checklist that address response to environmental concerns under this project component.

Because component 5c of the FOREST Project will involve subgrants and loans to "multiple sets of activities that are not yet fully designed, " an ***Umbrella IEE"*** concept will be applied to that portion of this IEE. In addition,"an ***Umbrella IEE"*** concept will be applied to Component 4 dealing with Renewable Energy Alternatives. This concept will allow USAID/Moscow to: a) deal with grants in a more generic fashion and engage their implementation partners in a subsidiary environmental screening and review process for specific activities during the grant-making process and, b) approve subsequent environmental review of grants at the Mission level.

1.2 Background

USAID has been providing significant support to the forestry sector since 1992 and this assistance comprises the major part of the Mission's environmental portfolio under S.O. 1.6. Increased Environmental Management Capacity to Support Sustainable Economic Growth. Forestry activities under S.O 1.6 have contributed to both local economic growth and reducing the negative effects of global climate change. Areas of support have included reforestation/seedling production; policy and legal assistance on the federal forest code, forest fire assistance (equipment and training), non-timber forest product production and marketing; ecotourism; strengthening nature reserves and building institutional capacity in various aspects of forest management. Almost all of USAID's forestry support has been directed to Russia's Far East and Siberia. USAID has worked with a number of partners in activity implementation including the USDA Forest Service, the World Wildlife Fund (WWF) and the Institute for Sustainable Communities (ISC), and numerous other Russian partners.

The Russia FOREST project will build upon and expand forestry initiatives previously supported by USAID/Moscow. The major goals of the project are to reduce the threat of global climate change and to preserve biodiversity through improved forest administration and monitoring and through the promotion of environmental awareness. Specifically, the project will achieve these goals through building and strengthening partnerships, stimulating broad public participation through the implementation of four technical components: a) forest fire prevention; b) pest management; c) non-timber forest products and secondary wood processing and d) renewable

energy alternatives. Three "cross cutting components" will support these four components: e) forest policy and legal reform; f) applied forestry research and g) a forestry grant/loan program.

1.3 Activity Description of Project Components

Details of the activities of the FOREST Project Components are described as follows:

Component 1: Forest Fire Prevention: Forests in the RFE and Siberia have been severely and repeatedly affected by large forest fires which have resulted in economic losses and large amounts of carbon emissions into the atmosphere. While fire is an integral part of the boreal ecosystem in Russia, a significant portion of fires are human induced. The FOREST project will aim to reduce carbon emissions by reducing the number of man-made fires by developing public awareness on fires. The project team will work closely with the US Forest Service and other partners to identify and understand behaviors that result in fires and devise messages advocating alternative behaviors. The project will use mass media to raise public awareness as well as conduct more targeted campaigns focused on specific groups. During the first year, the project will focus its efforts in Khabarovski Krai and then expand to other areas. In addition to the educational component, a pilot sub-activity will be undertaken in at least one krai to develop a network of rest areas. This activity will be implemented in Year 3 of the FOREST Project. One negative result of uncontrolled recreation is the large number of forest fires caused by people. To promote a fire prevention culture, a system of forest rest areas will be designed and created in a selected region. The basic infrastructure of such areas may include small parking areas, grills, picnic tables, benches, and rest rooms. If visitors' fees are further imposed for using these areas, additional revenue will be generated and can be further used for maintaining and improving the constructed facilities as well as for forest protection. The project team will collaborate with World Bank project activities, the MNR, and regional administrations to: select pilot site for forest rest area development and conduct surveys on recreation needs and levels of use; field ecotourism specialists to advice on environmentally sound rest area design, use of facilities to communicate fire prevention information forest area users, and a system of permits or fees; identify local organizations (NGOs, community groups, youth and university clubs) to participate in a Forest Rest Area Adoption program aimed at involving local forest users in maintaining rest area facilities; analyze impact of rest areas on fire prevention and organize study tour visits to disseminate lessons learned.; refine public awareness campaign approach to replicate the rest area development program on other regions.

Component 2: Pest Management: In addition to fire, the forests of Russia have been severely affected by massive pest outbreaks by such insects as the Siberian moth, Gypsy moth and Nun moth. The Pest Management Component of FOREST will assist Russians to improve pest monitoring and outbreak prediction by supporting improved data collection and analysis methodologies and by supporting research. Activities include the following: a) creation of a large-scale grid of pheromone traps for monitoring forest pest insects in selected regions, and integrate this method with existing monitoring systems operated by the forest service. This will involve the selection of 500-900 permanent monitoring sites separated by at least 20 km in areas most likely to have pest outbreaks to cover an area 500km by 500km. Location of the monitoring sites will be identified using a Global Positioning System (GPS). Defoliated areas will be detected and mapped from aircraft. Results of monitoring will be converted to electronic form and stored in a common comprehensive database. This approach will use a sequential spatial resolution technique in monitoring pests. Depending on the abundance of pest counts, a denser degree of traps (e.g. a 5-km grid) may be deployed in that location. If moth counts are significantly high, then egg mass sampling would be scheduled; b) development of a risk-assessment and decision-support system to control outbreaks of forest pest insects. The risk assessment and decision-support system developed for the USDA *Slow-the-Spread* project (www.ento.vt.edu) as a prototype will be used. This system will include the identification of areas where pest management actions are needed and will evaluate their success. This analytical system will recommend potential areas for more intensive sampling or treatment. However, treatment will not be funded under this project. Besides, it is generally not recommended unless sufficient sampling has been done in the previous year. The Sequential Spatial Resolution Technique in pest monitoring makes treatment more effective. Finally a Working Group on pest monitoring will organize a pest monitoring lab and a lecture series on relevant topics. It will also facilitate the restoration of pheromone trap production in Russia, establish cooperation between trap manufacturing companies in Russia and USA.

Component 3: Non-Timber Forest Products and Secondary Wood Processing: Non-timber forest products (NTFPs) and secondary wood products are a significant source of livelihood in Russia's Far East and hold great potential to expand broad-based economic growth. Traditional NTFPs include furs, ferns, berries, medicinal plants and mushrooms, most of which are not endangered species and are widely spread throughout the RFE, except some medicinal plants like ginseng. In addition, it is widely felt that value-added processing to lumber products would

greatly increase the return on wood sales while also reducing waste. This component will seek to improve the effectiveness and efficiency of producers by strengthening associations to better serve their constituencies. The FOREST Project will promote the use of participatory approaches through which association members can identify priorities for improving their businesses, such as training, technical expertise, study tours, access to information, and access to financial resources. The project will begin by studying the sector to collect better baseline data on the value and volumes of product as well as the extent and scope of harvesting impacts at the Krai level. Directories and databases on producer associations created under earlier projects will be updated, and information will be sought about problems and needs facing individual organizations and the entire sector. Targeted market studies focussing on selected NTFP and secondary wood products will be conducted to better understand factors affecting domestic and international supply and demand for these products. The project will also facilitate annual meetings for associations to provide a participatory forum for discussion of association priorities and strategic plans. Once the Grant Loan (crosscutting) component is initiated, associations will be eligible to apply for grants and small loans to businesses may be feasible.

Component 4: Renewable Energy Alternatives: Fossil fuels are a major source of greenhouse gas emissions. One strategy to reduce overall GHG emissions is the promotion of fuels with lower emission levels, including biomass energy. A greater percentage of Russian energy needs are expected to be satisfied with renewable energy alternatives, and in particular biomass energy from wood wastes. In the RFE and Siberia there are considerable resources of wood wastes (for example from pest infestations) which could be used for fuel. Currently much of the waste is under-utilized and can increase fire hazard by contributing to the fuel load in the forest. FOREST will identify available feedstock supplies, determine possible locations for biomass mini-grids and diesel replacement, conduct feasibility studies, and provide technical assistance in the introduction and application of appropriate state-of-the-art technologies for biomass energy. The FOREST Energy team will work with partners to identify financing (for biomass projects that have been found to be feasible, and encourage private development of biomass systems at the selected sites. Under this project component it is not planned to provide funding for biomass construction purposes. However, partner organizations will be eligible to apply for grants/loans for co-financing biomass development projects. In that case, further environmental analysis will be done. A key goal of this component is to create a conducive environment for the commercialization of biomass energy by ensuring legal, policy and contractual protections for private investments. Project activities will also build capacity for implementation of biomass energy projects. The FOREST Project will work closely with USAID, local NGOs' utilities, researchers, manufacturers and others to identify ways to increase the use of renewable resources in the region. The Energy team will utilize the services of the Russian Intersolarcenter in Moscow and will empower local Non-Government Organizations (NGOs) and Private Organizations (PVOs)
to ensure integration of renewables into the Russian energy system.

Component 5 (i.e., 3 Cross-Cutting Sub-components):

5a. Forest Policy and Legal Reform: Policy and Legal constraints are expected to be factors impacting the achievement of project goals under any or all of the four technical components above. The LOE devoted to policy and legal assistance will be based on the need determined during implementation by the project and its stakeholders as well as other factors such as manageable interest, cost/benefit, receptivity, and chances for success. FOREST has resources for analytical studies, policy dialogue, training and technical assistance on policy issues as required.

5b. Applied Forestry Research: The research component will serve as a management tool to measure results of all FOREST project components and will require a responsive, flexible, demand-driven approach. Studies will be required to collect baseline data for each indicator, as well as to collect information needed to prepare annual work plans for each technical component, and to carry out monitoring and evaluation. An overall indicator of project success will be the extent to which critical carbon sinks in the RFE and Siberia are conserved and sustained. FOREST will establish a collaborative research network for measuring changes in greenhouse gas emissions and changes in carbon stocks in the Russia FOREST project areas. The project will work with partner organizations to harmonize carbon monitoring methodologies and to obtain a clear picture of the impact of various activities on carbon stocks in the project permanent sample plots to generate carbon vegetation maps of the project areas.

5c. Grants/Loan Program: The Forestry Grant/Loan Program will provide funding to local institutions, NGOs, and enterprises to implement activities in support of project objectives under the four technical components. Implementation of the grants/loan program will not begin until the second year of the project. During the first year the Project team will consult with other USAID grant-making projects such as ROLL and Eco-links and develop grant criteria and processes. Grants are expected to cover such themes as public awareness, feasibility studies for biomass facilities, research, development of forest rest areas, non-timber forest product marketing, equipment

procurement, and others, but there is not sufficient information at this time to specify further. During year two, the project team will assess the feasibility of developing an environmental lending program to facilitate participants' access to credit. If it is determined to be feasible, the team will work with local financial institutions and credit programs to prepare a business plan.

2.0 Country and Environmental Information

With a total forested area of some 764 million hectares, Russia accounts for over 22 per cent of the world's forested area, 78 per cent of which is located in the Russian Far East (RFE) and Siberia. Russia's vast expanse of forests provides a major carbon sink that may represent as much as one-seventh of the earth's territorial carbon pool and about 75 percent of estimated net carbon storage capacity of the total boreal forest ecosystem. It is also an area of great cultural diversity, the home of numerous indigenous people, many of whom still practice traditional economies based on hunting, fishing, reindeer herding, and the use of non-timber forest resources. Moreover, the huge size of the forests of Siberia and the RFE and the biodiversity of their plant, and animal life and habitats make these forests an environmental factor of tremendous importance to Russia and the world from a sustainability standpoint which is akey to appropriate economic development in country like Russia.

However, many years of central planning policies in Russia led to unsustainable forest management practices which were exposed with the introduction of a market economy. The lack of budgetary funding for forest protection activities, low and unpaid salaries of forestry officials, gaps in the current forest legislation and its enforcement mechanisms, as well as high levels of unemployment among local populations have resulted in uncontrolled and unsustainable use of forest resources.

Substantial progress has been made in the area of forest policy and legal reform in the RFE. This includes analysis of the Russian Federal Forest Code, development and adoption of a Regional Forest Code for Khabarovski Krai, as well as development a draft forest code for Amurskaya Oblast. Now with the assistance of forestry experts from the RFE, this experience is being replicated in Siberia, where a forest code for Krasnoyarski Krai is under development. Development of these regional forest codes is an excellent first step towards introduction of sustainable forestry legislation.

Insects and disease play an important natural role in the evolution of forest ecosystems, but similar to fires, inappropriate human activity can greatly increase the intensity and frequency of pest and disease outbreaks. Total forest losses due to pest or disease outbreaks could be as high as the estimated losses due to forest fires.

A great deal of experience has been already gained in the area of pest control and management both in Siberia and the RFE. For example, in Krasnoyarski Krai, the World Bank funded a USD 5 million project on suppression of the Gypsy moth outbreak. While this project was successful, it focused primarily on suppression as opposed to prevention. Because outbreaks are difficult to suppress on such large territories, the early prevention method is more effective, both in terms of management and costs.

3.0 **Evaluation of Project Issues with respect to Environmental Impact Potential**

1. Component 1: Fire Prevention: *The first sub-component has no potential for environmental impacts as it is* solely focused on generating public awareness through the use of mass media and other educational methods.

The second sub-component will have adverse impact on the environment and will be implemented under the major assumption that only existing forest areas which are already used for uncontrolled recreation will be involved in the Forest Rest Area Network Development program. The current situation is that these areas are located without any consideration of environmental concerns, including the places with vulnerable or seriously damaged ecosystems. These areas are not controlled at all in terms of number of visitors and caused environmental impact. There is no even a basic infrastructure allowing visitors to minimize their negative environmental impact as a result of garbage that is not disposed off properly, parking cars and having barbecue all over the area, which may cause forest fires. The purpose of the proposed effort is to put this recreation process under control and to reduce negative environmental impact as well as a number of forest fires started by tourists through arranging an environmentally sound system of forest rest areas and using them for public fire prevention education. There will be no tree cut for any construction purposes associated with this activity. Any minor soil movements such as creep, settlement,

150

subsidence or swelling, if necessary will be closely monitored for any signs of movement, controlled to prevent damage to property and living organisms and followed by restoration activities. As a result the forest rest area development subcomponent, the sites will have a positive environmental impact on forest ecosystems in a selected project site.

2. Component 2: Pest Management: This component's purpose is to establish effective pest monitoring and early detection systems which, based on sound scientific data may identify areas for further treatment. Appropriate protocols as given in the IEE will be followed to address mitigation of adverse impacts on the environment and people.

For the monitoring system, the scale of the grid (size of the research area) reflects the distance between traps, and is based on sound statistical analysis and experimental design related to the populations of the pest species and their movement in these large forest areas. Adequate data collection will require the use of pheromone trapping methods and will be using a pheromone that has been synthesized but not registered with any government. All pheromones, by definition, only attract males of the same species although in some cases, males of closely related species are sometimes attracted. The traps are supplied with "Vapona" strips, which is a fumigant that kills any insects flying into the traps, so they can be easily identified when the traps are emptied. However, the traps are carefully designed so that the entry holes are large enough only to allow the specific insects to enter, and there is relatively little chance for other organisms to enter the traps. To date, we have no knowledge of there being any endangered species that might be negatively effected by this system.

In fact, it the establishment of this monitoring system is critical in light of the "without project" scenario. As mentioned, pest outbreaks in Russian forests have had severe economic and ecological consequences. Valuable timber is not only damaged and destroyed but large areas of trees are weakened and made vulnerable to forest fires and other disturbances. In the case of Russia, hundreds of thousands of hectares of trees have been defoliated by uncontrolled pest outbreaks, contributing to heavy fuel loading and serious fire risk. The U.S has a direct interest, because these pests are also a danger to US Forests. Russia has been treating past outbreaks of defoliators with a chemical known as Bacillus Thurengiensis or Bt. While relatively innocuous and safe, large areas were sprayed in the past because pest outbreaks were not detected early enough. Predicting population trends will allow early treatment over much smaller areas, more effectively and will result in a decrease in the use of pesticides. Any habitat that will be lost (extremely minimal) will be offset by new habitat being created along with lots of new green "browse" and soft mass production which is beneficial to wildlife.

3. Component 3: Non-Timber Forest Products and Secondary Wood Processing: The impacts of this component are expected to be minimal as the primary activity is providing training and technical assistance to producer associations.

However, there are a number of potential indirect environmental issues of extracting NTFPs and value added processing of timber. These include: a) the unsustainable harvest of a wild plant or animal or their parts, to the point of it becoming a threat to that species (for example Siberian ginseng; Amur Tiger)b) careless harvest of wood or wood products that does not pay attention to physical impacts (for example, when felling and skidding a tree; or constructing nature reserve infrastructure) c) worker health and safety at the mill, including the use of proper safety equipment and eye protection when working with caustic chemicals, machinery, etc. (substandard conditions observed in operations in Vladivlostok).

4. Component 4: Alternative Renewable Energy Resources: Activities under this project component will develop appropriate biomass technologies to meet industrial, commercial and large residential needs to integrate renewable energy into the Russian Energy System, therefore, adverse impacts of such activities should be evaluated and mitigated using the Umbrella IEE requirements presented in the IEE.

While the project will be promoting energy technologies that result in burning of wood waste, the "fuel switching" to this renewable form of energy will have far less adverse impact than carbon emissions given off by fossil fuels.

5. Component 5:

5a: Forest Policy and Legal Reform: This cross cutting sub-component is expected to have little to no environmental impact since activities will consist solely of technical assistance and training.

5b. Applied Forestry Research: This cross cutting component will have no significant impact on the environment and will in fact result in a positive impact as it is researching critical environmental, ecological and forest management questions through science. It will not be intrusive and will be of minimal scale required and be closely monitored. This component essentially represents the projects "monitoring and evaluation" element, which is designed to keep USAID and project partners informed as to environmental impacts and necessary interventions to correct these.

5c. Forestry Grant/Loan : Activities resulting from the loan/ grant component may have adverse impact on the environment and the impact of such activity needs to evaluated and mitigated using an Umbrella IEE requirements given in the IEE.

The Grant/Loan component will not be implemented until year 2 of the project. Insufficient information exists as to the types of activities. Based on past grant projects in the sector, applications might include requests for equipment, funds for construction of trails or facilities (rest areas) on nature reserves; technical assistance in marketing products, or other types of activities. Because activities will be numerous and fall under a broad spectrum, the impact on the environment is not known at this time. If funds are decided to be provided for biomass energy construction or other activities with potential negative environmental impact, additional evaluation of program issues with respect to environmental impact potential will be conducted on project to project basis. Also, implementors will be required to evaluate the adverse impacts and insure that AID funded activities under this component do not result in negative physical environmental impact.

4.0 Recommended Mitigation Actions (Including Monitoring and Evaluation)

Pursuant to 22 CFR 216.3 (a) (2) (iii), the originator of the proposed project has reviewed the potential environmental impacts of the activities summarized in the foregoing IEE. Each of the components has been reviewed separately and the project originator recommends the following Mitigation Actions (Including Monitoring and Evaluation):

Recommended Mitigation Actions for non-Umbrella IEE components

4.1 Forest Fire Prevention: Subcomponent 1. No mitigation is required.

Subcomponent 2 will involve basic infrastructure construction for forest rest area development in a selected project site. It may have adverse impact on the environment. Construction will be limited by only some of the existing rest areas improving them in terms of comfort and environmental compliance done by use of the evaluation and mitigation according the Environmental Assessment Checklist. This activity will be closely monitored and controlled. Project implementers will keep USAID informed of any environmental issues, which arise.

4.2 Component 2 on Pest Management: Pesticides Procedures cited under 22 CFR 216.3 (b) will be followed by the project implementor (i.e., a Negative Determination with Conditions unless an Environmental Assessment (i.e., a Positive Determination) covering a response to 22 CFR 216.3 (b) requirements on mitigation of adverse impacts on environment will be prepared by the implementor.

4.3 NTFPs/Secondary Wood Processing: The project implementers will promote environmentally sound methods and values in its training and technical assistance interventions, where-ever possible, and evaluate/ mitigate adverse impacts using the Environmental Assessment Checklist developed by the implementor and approved by USAID.

4.4 Renewable Energy Alternatives: As this component will identify financing for renewable energy projects and may be expected to result in an adverse impact on the environment, evaluation and mitigation of adverse impacts will be done by the implementor using the Umbrella IEE requirements given in the IEE.

4.5 a. Forest Policy and Legal Reform: No mitigation is needed.

4.5 b. Applied Research: No mitigation is needed.

4.6 4.5 c. Grant/Loan component: Multiple activities will be implemented in the future and there is not enough information.to determine impact. Activities will be screened separately when they are proposed. The

152

implementor will set up a screening process with evaluation and mitigation of adverse impacts to be done by the implementor using the Umbrella IEE requirements given in the IEE.

Review, Monitoring, And Mitigation Measures for Umbrella IEE components

4.1 Environmental Screening and Review

The environmental screening procedures are intended to result in environmental accountability and soundness, by requiring that the implementor put in place specific mechanisms to promote environmental review. These procedures are based on use of a Screening Form, presented as an attachment to the IEE. Activities judged to meet Category 3 or 4 as described in the attachment may not be awarded grants.

All activities will be individually screened using the attached Screening Form, (Attachment 1). The implementor will use the form to categorize the level of environmental concern for each of the grant activities. Activities found to meet the form's category 1 criteria will be approved with no further environmental requirements. An Environmental Review Report shall be prepared for all Category 2 activities. The Bureau Environmental Officer (BEO) on behalf of USAID/EE shall be responsible for clearances on the category determination and Environmental Review Reports. Prior to the approval of an activity, results of the environmental categorization must be available and considered.

For Category 2 projects, Environmental Review Reports, including BEO review must be completed prior to funding. No Category 3 or 4 activities will be approved. All awards will contain clauses stating that funding of Category 2, activities is contingent on findings, recommendations and clearance of the environmental documentation.

Copies of each screening form and (signed) Environmental Review Report will be kept in the grant file materials as part of the grantee's application.

The implementor's annual report to USAID/EE shall contain a section on environmental impacts, success or failure of mitigative measures being implemented, results of environmental monitoring, and any major modifications/revisions to the project, mitigative measures or monitoring procedures. A table indicating the title, date of award, and category of each grant activity will be provided as an annex of the annual report.

4.2 Environmental Responsibilities

The implementor is responsible for completing the environmental report forms and the BEO will approve the reviews for activities. The implementor and the grantees will ensure implementation of agreed-on mitigating measures and environmental impact monitoring. The implementor will monitor the environmental impacts of all project-financed activities, as further specified in the next section.

4.3 Monitoring, Evaluation, and Mitigation

An environmental monitoring, evaluation, and mitigation process will be established and used in accordance with the Environmental Review Report format given in the attachemnt. USAID-supported activities shall incorporate appropriate mitigation and monitoring procedures as listed below.

The implementor will use the *Environmental Screening Report* to assist them in determining what potential impacts should be of concern for different types of development activities in various settings. Using the information from this and other documents cited therein, The implementor staff will determine which impacts to mitigate and monitor for the particular development activity.

Russian laws and regulations for environmental protection, biodiversity conservation and environmental management will be followed in implementing the activities, unless specified otherwise.

5.0 Summary of Findings:

The findings under Categorical Exclusions of 22 CFR 216.2 are not applicable to assistance for the procurement or use of pesticides or similar chemicals. In such situations, Pesticides Procedures cited under 22 CFR 216.3 (b) will be followed by the project implementor unless an Environmental Assessment covering a response to 22 CFR 216.3 (b) requirements has been prepared and duly approved by the Bureau Environmental Officer (BEO).

153

The proposed action, to be undertaken for the FOREST project activities under Project Components 1, 5a and 5b, and portion of activities under Project Components 3 and 4, involving technical assistance, training, research and stakeholder participation through workshops, is entirely within the classes of action cited in Title 22 of the Code of Federal Regulations (CFR) Section 216.2, (Applicability of Procedures) paragraph (c)(2), [22CFR216.2(c)(2)] and therefore, are categorically excluded. Pursuant to 22CFR216.2(c)(3), the originator of the proposed actions has determined that such activities under the FOREST project are fully within the following classes of action:

Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction) [22 CFR 216.2(c)(2)(i)].

Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored [22 CFR 216.2(c)(2)(ii)].

Analyses, studies, academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)].
For Project Component 2 activities related to pest management and/or the procurement or use of pesticides or other chemicals, Pesticides Procedures cited under 22 CFR 216.3 (b) will be followed by the project implementor (i.e., a Negative Determination with Conditions unless an Environmental Assessment (i.e., a Positive Determination) covering a response to 22 CFR 216.3 (b) requirements has been prepared and duly approved by the Bureau Environmental Officer (BEO).

For project component 3 and a pilot sub-activity of rest areas for component 1 activities, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a Negative Determination with conditions requiring preparation of a check list by the implementor similar to the one attached to this IEE. This activity will support marketing of non-timber forest products which are not managed sustainably or which are restricted by CITIES, and increasing efficiency of wood processing to sustainable harvesting.

For project component 4, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a **negative determination (with conditions)** of significant environmental effect of the activities. The originator requests that the E&E/ BEO approve a negative threshold decision for those activities contingent on the use of the review, monitoring, and mitigation measures discussed in Section 4. Under this component, environmental improvement measures will include introduction of biomass and other relevant technologies.

For cross cutting sub-component 5c activities, and pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the project proposes a **negative determination (with conditions)** of significant environmental effect for sub-component 5c activities. The originator requests that the E&E/ BEO approve a negative threshold decision for those activities contingent on the use of the review, monitoring, and mitigation measures discussed in Section 4. At present, the specific details of activities to be supported by grants is not known, however, based on our previous experience, grants might include support for infrastructure in nature reserves, procurement of forestry or biomass equipment, forest pest research.

Revisions:

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant", this determination will be reviewed and revised by the originator of the project and submitted to the E&E Bureau Environmental Officer for approval and, if appropriate, an environmental assessment will be prepared.

Attachments:

- **Environmental Screening and Report Form for Umbrella IEE components**
- **Environmental Assessment Checklist**

ENVIRONMENTAL SCREENING & REPORT FORM FOR UMBRELLA IEE COMPONENTS

Background : The present Environmental Screening and Reporting Form (ESF) is designed to be consistent with the Initial Environmental Examination process, and to assist USAID Missions and their implementing partners design and implement activities in an environmentally sound manner in accordance with all salient agency policies and procedures. Use of the ESF will greatly reduce the need for review and approval of activities at the regional or Washington levels.

Introduction to Use of this Form: *This form is intended to be adaptable to unique circumstances.* Thus, its final contents and conditions of use are to be refined and jointly determined among the affected partners including PVO, NGO, USAID, host country agencies, etc. To the extent possible, the form should reflect host government environmental policies and procedures.

In using it, adjustments can be made in consultation with the Regional Environmental Officer and Bureau Environmental Officer. It is strongly advised that the Mission Environmental Officer make on-site visits prior to finalization of the ESF, and that the ESF be rational and fully defensible and without ambiguity as to how the conclusion was reached that the activity (ies) will have no significant impact.

ENVIRONMENTAL SCREENING/REPORT FORM FOR ACTIVITIES & GRANT PROPOSALS

Implementor: _____

Other Implementing Partner(s)[if Appropriate]_____

Activity Name: _____

Duration (proposed start and completion dates): _____

Geographic Location: _____

Activity Description (paragraph(s) describing purpose/outputs and potential environmental impacts):

[add space as needed]

Determine the Nature of the Activity

a. ***Environmental Review Report Needed.*** Does the activity include funds to support any physical natural resource management activities (e.g., land clearing, irrigation), or any community and rural development services (e.g., agroforestry, tree-planting), infrastructure (e.g., dams or water catchments), public facilities (e.g., water and sanitation systems), road construction or rehabilitation? Does it involve development of income-generating or resource management systems? It will likely require an Environmental Review of the kind described in Step 4 of this form. Determine which Category the activity falls under, to establish the need for the Environmental Review.

b. **No Further Environmental Review Required.** Does the activity exclusively provide technical assistance, training, institutional strengthening, or research, education, studies or other information analysis, awareness-building or dissemination activities *with no foreseeable negative impact on the biophysical environment*? This probably qualifies as a Category 1 activity—no further environmental review or action may be necessary. Complete form to establish this circumstance.

c. **Multiple Categories.** Many activities will have components in more than one category. Simply mark all that apply. The form will guide you to the appropriate next steps.

Step 1. Determine Category of Activity.

- ***Category 1*** **-- no further environmental review needed:**

Does the activity involve (mark yes, if applicable):

___ Provision of education, technical assistance, or training. Does *not* qualify for "Category 1" if such programs include activities directly affecting the environment.
___ Community awareness initiatives.
___ Controlled experimentation exclusively for the purpose of research and field evaluation confined to small areas (normally under 4 ha., i.e., 10 acres) and carefully monitored (when no protected or other sensitive environmental areas could be affected).
___ Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.
___ Document or information transfers.
___ Nutrition, health care or family planning. Such programs do *not* qualify for "Category 1" if (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazardous (esp. HIV/AIDS) waste is handled or blood is tested.
___ Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices (when no protected or other sensitive environmental areas could be affected). *Note that USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.*
___ Construction or repair of facilities if total surface area to be disturbed is under 10,000 sq. ft. (approx. 1,000 sq. m.) (*and* when *no* protected or other sensitive environmental areas could be affected).
___ Support for intermediate credit arrangements (when *no* significant biophysical environmental impact can reasonably be expected).
___ Programs of maternal and child feeding conducted under Title II of Public Law 480.
___ Food for development programs under Title III of P.L. 480, when <u>no</u> on-the-ground biophysical interventions are likely.
___ Studies or programs intended to develop the capability of recipients to engage in development planning. Do *not* mark "yes" if these involve activities directly affecting the environment.

Category 2 **-- Negative environmental impacts possible, environmental review required (specific conditions, including monitoring, may be applied):**

Note: The Environmental Review (Step 4 below) must address why there will be no potential adverse impacts on protected areas, endangered or threatened species or their critical habitat; or relatively undegraded forest, i.e., justify your conclusion that the proposed Category 2 activities do not belong in Category 3 or 4. Even for activities designed to protect or restore natural resources, the potential for environmental harm exists (e.g., re-introduction of species, controlled burning, fencing, wildlife water points, spontaneous human population shifts in response to activities undertaken, etc.). *If you do not find an exact match listed here for the activity you are undertaking, and it is not in Category 1, 3 or 4, then use the last item in Category 2 to describe the activity and treat it as Category 2 for purposes of environmental review.*

Does the activity involve (mark yes, if applicable):

___ Small-scale activities in agriculture, NRM, sanitation, etc. (*list and scale to be defined mutually among the appropriate partners* -- NGO, donor, host country agencies, etc.).

___ Controlled experimentation exclusively for the purpose of research and field evaluation *(areas of 4 ha. or more,* i.e., 10 acres) and carefully monitored, when neither protected or other sensitive environmental areas could be adversely affected nor threatened and endangered species and their habitat jeopardized.

___ Small-scale construction or rehabilitation of facilities or structures in which the surface area to be disturbed exceeds 10,000 sq. ft and funding level is not in excess of $200,000 and where no protected or other sensitive environmental areas could be affected.

___ Minor construction or rehabilitation of rural roads less than ca. 10 km (with no change in alignment or right of way), with ecologically sensitive areas at least 100 m away from the road and not affected by construction or changes in drainage; likewise, no protected areas or relatively undegraded forest should be within 5 km of the road.

___ Nutrition, health care or family planning, *if* (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazardous (esp. HIV/AIDS) *waste is handled or blood is tested.*

_____ Construction or rehabilitation of small-scale water points or water storage devices for domestic or non-domestic use, not covered in Category 1, when neither protected or other sensitive. environmental areas could be adversely affected nor endangered and threatened species jeopardized *Note that USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.*

___ Quantity imports of commodities such as fertilizers.

___ Food for Development programs under Title II or III, involving known biophysical interventions with potential to cause environmental harm (e.g., roads, bore holes).

___ Support for intermediate credit institutions when indirect environmental harm conceivably could result.

___ Institutional support subgrants to NGOs/PVOs when the activities of the organizations are known and raise the likelihood of some environmental impact.

___ Technical studies and analyses and other information generation activities that could involve intrusive sampling, including aerial surveys, of endangered species or critical habitats.

___ Small-scale use of USEPA-registered least-toxic *general-use pesticides*, limited to CNFA/NGO-supervised use by farmers, demonstration, training and education, or emergency assistance. Environmental review must be carried out consistent with USAID Pesticide Procedures as required in Reg. 16 [22 CFR 216.3(b)(1)].

___ Other activities not in Category 1 and not in Category 3 or 4. Specify:_____

_____

_____

Were the following used by the PVO/NGO in designing the above Category 2 activities (mark yes, if applicable)?

Any applicable Programmatic Environmental Assessments: _____

_____

Other(s):_____

- *Category 3* -- **Significant environmental impacts likely. Environmental review required, and Environmental Assessment likely to be required:**

Does the activity involve (mark yes, if applicable):

___ River basin or new lands development

___ Planned resettlement of human populations

___ Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas

___ Substantial piped water supply and sewerage construction

___ Major bore hole or water point construction

___ Large-scale irrigation

___ Water management structures such as dams and impoundments

___ Drainage of wetlands or other permanently flooded areas

___ Large-scale agricultural mechanization

___ Agricultural land leveling

___ Procurement or use of restricted use pesticides, or wide-area application in non-emergency conditions under non-supervised conditions
___ Light industrial plant production or processing (sawmill operation, agro-industrial processing of forestry products)
___ Potential to significantly degrade protected areas, such as introduction of exotic plants or animals
___ Potential to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)

The above Category 3 activities are consistent with USAID criteria for activities that normally require a USAID-specific document with a defined format and procedure, called the Environmental Assessment (EA). It is recognized that some of these categories are ambiguous. Mark "yes" if they apply, and show in the Environmental Review (Step 4) the extent and magnitude of activities and their impacts, so that USAID and its partners can determine if an EA is necessary or not.

- *Category 4* -- **Activities not fundable or fundable only when specifically defined findings to avoid or mitigate the impacts are made, based on an Environmental Assessment[1]:**

  ***Does the activity* involve (yes, no, N/A):**

___ Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals
___ Actions determined likely to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)[2]
___ Conversion of forest lands to rearing of livestock
___ Planned colonization of forest lands
___ Procurement or use of timber harvesting equipment
___ Commercial extraction of timber

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1 Per Foreign Assistance Act Sect. 118 & 119 relating to overseas assistance affecting Tropical Forestry and Biodiversity.

2 Per USAID Environmental Procedures, §22 CFR 216.5, on Endangered Species

___ Construction of dams or other water control structures which flood relatively undegraded forest lands
___ Construction, upgrading or maintenance of roads (including temporary haul roads for logging or other extractive industries) which pass through relatively undegraded forest lands.

Step 2. Summarize and Itemize Activities. List activities by all categories to which *Yes* was answered.

Category of activities as determined below (add entries as required):

Activity/Sub-Activity	Funding:	Category

Step 3. Determine Need to Prepare Environmental Review.

If all activities are in Category 1, sign and date the form. For any activities in Category 2 and 3, prepare an Environmental Review Report assessing all of these activities' impacts. For Category 3 activities, further documentation would be required, once USAID has confirmed the applicability of Category 3, based on the Review. If Category 4 is possible, consult USAID before proceeding with the Environmental Review to determine if activities can be funded and/or whether required EA findings could be made.

For all Category 2 and 3 activities, proceed to Step 4 to prepare Environmental Review.

Step 4. Prepare Environmental Review.

Suggested Format for Environmental Review

The Environmental Review should be about 5-10 pages long (more if required) and consist of following sections:

1. **Background, Rationale and Outputs/Results Expected** -- summarize and cross-reference proposal if this review is contained therein.

2. **Activity Description** – Succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during construction, how intervention will operate and any ancillary development activities that are required to build or operate the primary activity (e.g., road to a facility, need to quarry or excavate borrow material, need tolay utility pipes to connect with energy, water source or disposal point or any other activity needed to accomplish the primary one but in a different location). If various alternatives have

been considered and rejected because the proposed activity is considered more environmentally sound, explain these.

3. **Environmental Situation** -- Affected environment, including essential baseline information available for all affected locations and sites, both primary and ancillary activities.

4. **Evaluation of Activities and Issues with Respect to Environmental Impact Potential** -- Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with restoring or reusing the site, if the facility or activity were completed or ceased to exist. Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.) Indicate positive impacts and how the natural resources base will be sustainably improved.

5. **Environmental Mitigation Actions** (including **monitoring** and **evaluation)** -- For example, indicate means taken to avoid, reduce or compensate for impacts, such as restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents. Indicate how mitigative measures will be monitored to ensure that they accomplish their intended result or what monitoring might be needed for impacts that one is uncertain about.

6. **Other Information** (as appropriate) -- where possible, include photos of the site and surroundings; list the names of any reference materials or individuals consulted.

Note: Specific plans for monitoring of key environmental indicators and mitigation of impacts during activity implementation are especially important; these must be addressed in the review. Information on monitoring results and mitigation of impacts are to be included in all progress reports. Important information and a criterion for evaluation of environmental soundness is showing how the activity is part of or guided by an integrated, community-based resource and land use plan or planning and management framework that considers the appropriate use of multiple resources.

Drafted by: _____ Date:

Reviewed by: _____ Date:

Clearances: (modify as appropriate)

Project Officer: _____ Date:

MEO (including recommendation that an EA be prepared, if called for):
_____ Date:

USAID Mission Director (if responsibility not delegated to MEO):
_____ Date:

ENVIRONMENTAL ASSESSMENT CHECKLIST

It is recommended that the Mission Environmental Officer or Regional Environmental Officer make on-site visit to validate the checklist that will be prepared by the implementers of the grant and/ or a subgrant.

The purposes of this *Environmental Assessment Checklist (EA Checklist)* are to determine whether the proposed action (scope of work) encompasses the potential for environmental pollution or damage and, if so, to determine the scope and extent of additional environmental evaluation, mitigation, and monitoring necessary to fulfill federal U.S. environmental requirements. The *EA Checklist* is intended to be used in conjunction with a brief Project Description prepared by the Project Director.

ENVIRONMENTAL CONSEQUENCES: Check appropriate column as Yes (Y), Maybe (M), No (N) or Beneficial (B). Briefly explain Y, M and B checks in next Section, "Explanations". A "Y" response does not necessarily indicate a significant effect, but rather an issue that requires focused consideration,

Y, M, N or B

1. **Earth Resources**
   - a. grading, trenching, or excavation > 1.0 hectare ___
   - b. geologic hazards (faults, landslides, liquefaction, unengineered fill, etc.) ___
   - c. contaminated soils or ground water on the site ___
   - d. offsite overburden/waste disposal or borrow pits required > 1.0 ton ___
   - e. loss of high-quality farmlands > 10 hectares ___

2. **Agricultural and Agrochemical**
   - a. impacts of inputs such as seeds and fertilizers ___
   - b. impact of production process on human health and environment ___
   - c. Other adverse impacts ___

3. **Industries**
   - a. impacts of run-off and run-on water
   - b. impact of farming such as intensification or extensification ___
   - c. impact of other factors ___

4. **Air Quality**
   - a. substantial increase in onsite air pollutant emissions (construction/operation) ___
   - b. violation of applicable air pollutant emissions or ambient concentration standards ___
   - c. substantial increase in vehicle traffic during construction or operation ___
   - d. Demolition or blasting for construction ___
   - e. substantial increase in odor during construction or operation ___
   - f. substantial alteration of microclimate ___

5. **Water Resources and Quality**
   - a. river, stream or lake onsite or within 30 meters of construction ___
   - b. withdrawals from or discharges to surface or ground water ___
   - c. excavation or placing of fill, removing gravel from, a river, stream or lake ___
   - d. onsite storage of liquid fuels or hazardous materials in bulk quantities ___

6. **Cultural Resources**
   - a. prehistoric, historic, or paleontological resources within 30 meters of construction ___
   - b. site/facility with unique cultural or ethnic values ___

7. **Biological Resources**
   - a. vegetation removal or construction in wetlands or riparian areas > 1.0 hectare ___
   - b. use of pesticides/rodenticides, insecticides, or herbicides > 1.0 hectare ___
   - c. Construction in or adjacent to a designated wildlife refuge ___

8. **Planning and Land Use**
   a. potential conflict with adjacent land uses ___
   b. non-compliance with existing codes, plans, permits or design factors ___
   c. construction in national park or designated recreational area ___
   d. create substantially annoying source of light or glare ___
   e. relocation of >10 individuals for +6 months ___
   f. interrupt necessary utility or municipal service > 10 individuals for +6 months ___
   g. substantial loss of inefficient use of mineral or non-renewable resources ___
   h. increase existing noise levels >5 decibels for +3 months ___

9. **Traffic, Transportation and Circulation**
   a. increase vehicle trips >20% or cause substantial congestion ___
   b. design features cause or contribute to safety hazards ___
   c. inadequate access or emergency access for anticipated volume of people or traffic ___

10. **Hazards**
   a. substantially increase risk of fire, explosion, or hazardous chemical release ___
   b. bulk quantities of hazardous materials or fuels stored on site +3 months ___
   c. create or substantially contribute to human health hazard ___

11. **Other Issues**
   a. Substantial adverse impact ___
   b. Adverse impact ___
   c. Minimal impact ___

EXPLANATION: explain Y, M and B responses

RECOMMENDED REVIEW, MITIGATION AND MONITORING MEASURES

RECOMMENDED ACTION (Check Appropriate Action):

(a) The project has no potential for substantial adverse environmental effects. No further environmental review is required.
(b) The project has little potential for substantial adverse environmental effects, however the recommended mitigation measures (listed above) will be implemented. No further environmental review is required.
(c) The project has substantial but mitigatable adverse environmental effects and required measures to mitigate environmental effects (listed above) will be will be implemented.
(d) The project has potentially substantial adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared.
(e) The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required.
(f) The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

APPROVAL

Project Director/ Chief of Party _____ Date _____

162

INITIAL ENVIRONMENTAL EXAMINATION

Program/Activity Number:	167-0003
Country/Region:	Kosovo
Activity Title:	Community Infrastructure and Services Program
Funding:	FY 2000 - FY 2002
Resource Level(s)/Amount(s):	$45 million
IEE Prepared By:	Michael Gould E&E/DG/LGUD Date: January 2000
IEE Amendment (Y/N):	NO

ENVIRONMENTAL ACTION RECOMMENDED:

Categorical Exclusion: __X__ Negative Determination: __X__

Positive Determination: ____ Deferral: ____

SUMMARY OF FINDINGS:

The Community Infrastructure and Services Program consists of three activities:

Activity 1: The provision of funding for USAID management, monitoring and evaluation of the program;
Activity 2: A contract with a general contractor to provide management, engineering design, construction supervision services, and assist with institutional strengthening of local utility companies; and
Activity 3: Rehabilitation of community infrastructure: These activities will consist of small projects, generally valued at less than $100,000, aimed at rehabilitation and upgrading of public buildings, small scale water supply systems, small scale sewer systems, electric distribution systems, municipal roads, health centers and schools. The small scale, dispersed rehabilitation projects to be completed is not expected to have a significant effect on the environment.

Activities (1) and (2)

The proposed action is entirely within one of the categories listed in paragraph (c)(1), "Categorical Exclusions," of Section 216.2, "Applicability of Procedures," of Title 22 CFR Part 216, "AID Environmental Procedures." Pursuant to 22 CFR 216.2(c)(3), the originator of the proposed action has determined that the proposed action is fully within the following classes of actions:

Education, technical assistance, or training programs.
[22 CFR 216.2(c)(2)(i)].

Pursuant to 22 CFR 216.2(c)(2), the proposed action is categorically excluded from further environmental review. As per 22 CFR 216.2(c)(1), neither an initial environmental examination nor an environmental assessment is required for an action which is determined to fall within one or more of the categories listed at 22 CFR 216.2(c)(2).

Activity (3) - Community Infrastructure

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project recommends a negative determination of significant environmental effect for the community infrastructure rehabilitation element, of the Community Infrastructure and Services Program, and requests EE Bureau approval of a negative threshold decision for these activities contingent on the application of the mitigating measures presented in Section 4.

REVISIONS

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

Mission Director: Date:

CONCURRENCE:

Bureau Environmental Officer: Date:
Approved: _____.
Disapproved:_____.

USAID/W filename: Kosovo.IEE.doc

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/PROJECT DATA:

Program Number:	167-0003
Country/Region:	Kosovo
Title of Program/Activity/Project:	Community Infrastructure and Services Program

1.0 BACKGROUND AND PROJECT DESCRIPTION

The objective of the Community Infrastructure and Services Program (CISP) is to stabilize Kosovar communities damaged by war, thus helping to create the basis for a normal life conducive to permanent peace, and encourage economic growth in the municipalities and villages assisted. The Program achieves this objective by supporting the reconstruction and operation of local infrastructure in areas where these interventions can effectively promote the normalization of community life and the restart of economic livelihood.

The people of Kosovo have been severely impacted by the recent war and the events leading up to it. In 1991 most Albanian Kosovars were displaced from civil service positions. Since then Serbian authorities provided little investment in public utilities and infrastructure deteriorated in terms of capacity and quality of service. During the recent conflict further damage was done. The International Management Group (IMG) with funding from the World Bank and the European Commission has broadly documented the condition of the infrastructure of Kosovo.

The Community Infrastructure and Services Program will assist in the repair of damaged and neglected infrastructure and provide limited technical assistance for institutional strengthening. Numerous donors and NGOs are involved in this overall effort, however, the USAID program will concentrate at the community level working with the Community Improvement Councils (CIC) which have been established with the assistance of USAID's Office of Transition Initiatives (OTI). More than 160 of these councils have been established in 24 of the 29 municipalities in Kosovo. Coordination with the CICs will ensure that the local infrastructure projects funded by CISP will be directed at the needs of the local people.

The activities will be normally less than $100,000 although some larger projects will be implemented. The sectors addressed will include local electricity distribution, water supply, sanitation including sewers and solid waste management, schools, health clinics, other public buildings and local roads. A total of 300 small construction

165

projects will be implemented. Almost all of these will be repair of existing facilities rather than new construction.

The institutional strengthening program will provide training and computer-based financial management systems to selected municipal water and regional electricity distribution companies. The program will supply limited quantities of computers, software and related materials.

An Initial Environmental Examination (IEE) needs to be performed on this program to permit the obligation of funds.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Kosovo is a former province of the Republic of Serbia. It is bordered by Serbia on the north and east, by Macedonia on the south and Montenegro and Albania to the west. It is landlocked and approximately 10,000 square kilometers in area. The population prior to the recent conflict was approximately 2,200,000 but has now been reduced to about 1,700,000 due to the non-return of some of the refugees. The terrain is varied with mountain ranges along the borders with Albania and Montenegro, with fertile plains extending through most of the country. The land use is predominately devoted to field crops including corn, soybean and vegetables. Most of the people reside in rural farming communities in close proximity to a regional center of approximately 50,000 – 100,000 people.

The capital city is Pristina with a population of approximately 300,000. Some mining of zinc, lead and gold is done in the north-east near the town of Mitrovice. The climate is essentially continental due to the isolation from the Adriatic and Mediterranean sea climate zones caused by the mountain ranges to the west and partially to the south. The summers are hot and dry with relatively cold winters with heavy snowfall.

3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

The Community Infrastructure and Services Program consists of three types of activities: (1) the provision of funding for USAID management, monitoring and evaluation of the program; (2) a contract with a general contractor to provide management, engineering design, construction supervision services, and assist with institutional strengthening of local utility companies ; and (3) rehabilitation of community infrastructure.

Rehabilitation of community infrastructure will consist of small projects, generally valued at less than $100,000, aimed at rehabilitation and upgrading of public buildings, small scale water supply systems, small scale sewer systems, electric distribution systems, municipal roads, health centers and schools. The projects will be undertaken by local construction firms under the supervision of a U.S. general contractor who will

also be responsible for designing and awarding contracts for the work, and construction supervision. The small scales, dispersed rehabilitation projects to be completed are not expected to have a significant effect on the environment.

While these small-scale rehabilitation projects are not expected to have significant negative effects on the environment, mitigating actions are built into the project design to negate the following potential effects on the environment:

(1) Water system rehabilitation presents the potential for contamination of water lines that are being repaired or replaced. Excavation of pipe trenches may lead to erosion and problems of disposing of excavated material which may contain elements harmful to the environment.
(2) Sewer system repair, rehabilitation or cleaning may lead to problems in disposing of excavated material and sludge.
(3) In the rehabilitation of public buildings, schools and health clinics care must be taken to protect the users by insuring that materials are safe and environmentally friendly. Site runoff can cause erosion problems.
(4) Electric distribution system rehabilitation may present problems in disposal of older model transformers containing PCV or other harmful chemicals.
(5) Construction sites present hazards to the safety of both construction workers and others in the area.
(6) Road construction and rehabilitation can lead to improper disposal of excavated materials, batch plants which cause environmental damage and erosion problems.

Mitigating actions presented in the following section are proposed to ensure that environmental concerns are taken into account during both the design and construction phases of the projects.

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project has reviewed the potential environmental impacts of the action summarized in the foregoing IEE. It has been determined that the basic community infrastructure rehabilitation program component, Activity (3), of the proposed project, if implemented as described, will not have a significant negative impact on the environment. The reconstruction of public buildings, small-scale water supply systems, small-scale sewer systems, electric distribution systems, municipal roads, health centers and schools would only have beneficial effects on the living conditions and environment of Kosovo. To ensure compliance with A.I.D. environmental procedures, all construction activities will be monitored and documented. The environmental status of the project will be reviewed periodically during implementation by means of routine site visits by USAID/Kosovo staff. Any required correction in implementation will be made on the basis of these findings and in accordance with the following guidelines.

GUIDELINES: The general contractor will prepare environmental guidelines and checklists, similar to the attached Environmental Assessment Checklist, which will be used to identify the aspects of the projects that may have significant environmental impact. Since the majority of the projects under CISP involve repair and rehabilitation of existing facilities, it is not expected that negative environmental impacts will be frequent or significant. However, when the analysis indicates that negative environmental impacts may occur then the project will be designed to avoid or mitigate these impacts. In particular, when appropriate the contractor should address:

(1) Debris Disposal - by requiring construction contractor's to dispose of debris at appropriate sites approved by Kosovar authorities in concurrence with USAID official;
(2) Chlorinating of Drinking Water - by requiring that water lines which are repaired or replaced are chlorinated to the degree necessary to provide safe service once the lines are put back into operation;
(3) Water Quality Monitoring - by establishing water quality testing procedures with local utilities in conjunction with water and sewer rehabilitation projects;
(4) Safety - by assuring that construction contracts include clauses addressing the safety of both contractor personnel and the public:
(5) Road Construction - by assuring that contracts address runoff, erosion and the safe disposal of materials; and
(6) Public Building Rehabilitation - by assuring that environmentally safe material are used in the rehabilitation of public buildings.

The guidelines will also describe procedures used in the supervision of construction to ensure best practices on the construction sites to mitigate short-term construction related impacts such as runoff management. Overall, the CISP will have a positive impact on the people served by the rebuilt, improved and renovated infrastructure.

Copies of the environmental checklists, baseline environmental surveys, construction site monitoring reports will be kept on file by the contractor and will be provided to USAID for review and monitoring purposes.

MONITORING: Under the U.S. general contractor's scope-of-work, the contractor is required to develop environmental guidelines to help identify potential negative environmental effects, identify mitigating actions , and develop procedures for supervising construction to assure that the recommended mitigating measures are being addressed as planned.

In addition, USAID/Kosovo staff, a USPSC Engineer and three FSN Engineers, will monitor both the general contractor's work and the work of construction subcontractors to assure that environmental concerns are addressed from design through the completion of construction. This will be assured through USAID approval of designs, review of the general contractors environmental reports and assessments, and through site visits to assure that mitigating actions are actually implemented. Deviations will be reported to the Mission Environmental Officer to initiate corrective action.

A summary report will be sent to EE/BEO office in AID/W per 216.10 requirements.

5.0 SUMMARY OF FINDINGS

Environmental Determination:

Activities (1) and (2)

(1) The provision of funding for USAID management, monitoring and evaluation of the program;

(2) A contract with a general contractor to provide management, engineering design, construction supervision services, and assist with institutional strengthening of local utility companies;

The proposed actions are entirely within one of the categories listed in paragraph (c)(1), "Categorical Exclusions," of Section 216.2, "Applicability of Procedures," of Title 22 CFR Part 216, "AID Environmental Procedures." Pursuant to 22 CFR 216.2(c)(3), the originator of the proposed action has determined that the proposed action is fully within the following classes of actions:

Education, technical assistance, or training programs.
[22 CFR 216.2(c)(2)(i)].

Pursuant to 22 CFR 216.2(c)(2), the proposed action is categorically excluded from further environmental review. As per 22 CFR 216.2(c)(1), neither an initial environmental examination nor an environmental assessment is required for an action which is determined to fall within one or more of the categories listed at 22 CFR 216.2(c)(2).

Activity (3) - Community Infrastructure

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project recommends a negative determination of significant environmental effect for the community infrastructure rehabilitation activity of the Community Infrastructure and Services Program. Request the EE Bureau Environmental Officer approval of a negative threshold decision for these activities contingent on the application of the mitigating measures presented in Section 4.

REVISIONS

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer and if appropriate, an environmental assessment will be prepared.

ENVIRONMENTAL ASSESSMENT CHECKLIST

The purposes of this *Environmental Assessment Checklist (EA Checklist)* are to determine whether the proposed action (scope of work) encompasses the potential for environmental pollution or damage and, if so, to determine the scope and extent of additional environmental evaluation, mitigation, and monitoring necessary to fulfill federal U.S. environmental requirements. The *EA Checklist* is intended to be used in conjunction with a brief Project Description prepared by the Project Engineer.

ENVIRONMENTAL CONSEQUENCES: Check appropriate column as Yes (Y), Maybe (M), No (N) or Beneficial (B). Briefly explain Y, M and B checks in next Section, "Explanations". A "Y" response does not necessarily indicate a significant effect, but rather an issue that requires focused consideration,

		Y, M, N or B
1.	**Earth Resources**	
	a. grading, trenching, or excavation > 1.0 hectare	___
	b. geologic hazards (faults, landslides, liquefaction, unengineered fill, etc.)	___
	c. contaminated soils or ground water on the site	___
	d. offsite overburden/waste disposal or borrow pits required > 1.0 ton	___
	e. loss of high-quality farmlands > 10 hectares	___
2.	**Air Quality**	
	a. substantial increase in onsite air pollutant emissions (construction/operation)	___
	b. violation of applicable air pollutant emissions or ambient concentration standards	___
	c. substantial increase in vehicle traffic during construction or operation	___
	d. Demolition or blasting for construction	___
	e. substantial increase in odor during construction or operation	___
	f. substantial alteration of microclimate	___
3.	**Water Resources and Quality**	
	a. river, stream or lake onsite or within 30 meters of construction	___
	b. withdrawals from or discharges to surface or ground water	___
	c. excavation or placing of fill, removing gravel from, a river, stream or lake	___
	d. onsite storage of liquid fuels or hazardous materials in bulk quantities	___
4.	**Cultural Resources**	
	a. prehistoric, historic, or paleontological resources within 30 meters of construction	___
	b. site/facility with unique cultural or ethnic values	___
5.	**Biological Resources**	
	a. vegetation removal or construction in wetlands or riparian areas > 1.0 hectare	___
	b. use of pesticides/rodenticides, insecticides, or herbicides > 1.0 hectare	___
	c. Construction in or adjacent to a designated wildlife refuge	___
6.	**Planning and Land Use**	
	a. potential conflict with adjacent land uses	___
	b. non-compliance with existing codes, plans, permits or design factors	___
	c. construction in national park or designated recreational area	___
	d. create substantially annoying source of light or glare	___
	e. relocation of >10 individuals for +6 months	___
	f. interrupt necessary utility or municipal service > 10 individuals for +6 months	___
	g. substantial loss of inefficient use of mineral or non-renewable resources	___
	h. increase existing noise levels >5 decibels for +3 months	___
7.	**Traffic, Transportation and Circulation**	

a. increase vehicle trips >20% or cause substantial congestion ___
b. design features cause or contribute to safety hazards ___
c. inadequate access or emergency access for anticipated volume of people or traffic ___

8. **Hazards**
a. substantially increase risk of fire, explosion, or hazardous chemical release ___
b. bulk quantities of hazardous materials or fuels stored on site +3 months ___
c. create or substantially contribute to human health hazard ___

EXPLANATION: explain Y, M and B responses

RECOMMENDED MITIGATION MEASURES

RECOMMENDED ACTION (Check Appropriate Action):

(a) The project has no potential for substantial adverse environmental effects. No further environmental review is required.
(b) The project has little potential for substantial adverse environmental effects, however the recommended mitigation measures (listed above) will be incorporated in the SOW. No further environmental review is required.
(c) The project has substantial but mitigatable adverse environmental effects and required measures to mitigate environmental effects (listed above) will be included in the SOW.
(d) The project has potentially substantial adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared.
(e) The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required.
(f) The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

APPROVAL

Project Director _____ Date _____

/KosovoENVCKLIST

INITIAL ENVIRONMENTAL EXAMINATION (IEE)

Title of Activity/Activity Number: Strengthening Sustainable Water Management in South Caucasus /110-0003, 110-0002.14

Country/Region: South Caucasus (Armenia, Azerbaijan, Georgia)

Funding Period: FY 2000 – FY 2002 **Resource Levels/Amount(s):** $ 4 million

Statement Prepared by: Nino Nadiradze Date: 26 December 2000

IEE Amendment (Y/N)? No **Date of Original IEE:** _____

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
*air*___ *water* x__ *land*___ *biodiversity* (e.g. wetlands) _____ *human health*____
*other*____ *none*_____

Note: USAID activities will be designed to have a direct beneficial impact on these media.

Environmental Action(s) Recommended (check all that apply):

__x___ 1. *Categorical Exclusion*(s)

__x__ 2. Initial Environmental Examination:

__x__ *Negative Determination*: no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:

__ __ without conditions (no special mitigation measures needed: normal good practices and engineering will be used)

__x__ with conditions (special mitigation measures specified to prevent unintended impact)

__x__ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.

__x__ conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

Summary of Findings:

The proposed actions for training, workshops, conferences and logistical needs supporting USAID's strategic objective, analysis, studies, workshops and meetings, support for assessments, and studies are entirely within the classes of actions listed in paragraph (c)(2) of 22 CFR 216 and therefore are *categorically excluded*. Pursuant to 22 CFR 216.2 (c)(3), the originator of the proposed actions has determined that the proposed actions are fully within the following classes of actions:

Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction) [22 CFR 216.2(c)(2)(i)].

Analysis, studies (support for assessments), academic or research workshops and meetings [22 CFR 216.2(c)(2)(iii)].

Document and information transfers [22 CFR 216.2 (c)(2) (v)].

Studies, projects or programs intended to develop capability of recipient countries to engage in development planning, except to the extent designed to result in activites directly affecting the environment (such as construction of facilities, etc.) [22 CFR 216.2 (c)(2) (xiv)].

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project also recommends a *negative determination with conditions* of significant environmental effect for physical interventions related to small pilot projects and Physical Infrastructure of Water Monitoring and Management Systems to be carried out under SpO 1.5, IR 1.5.4.

Revisions:

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant", this negative determination will be reviewed, revised and submitted to the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

Mission Director: _____ 1-4-01

Regional Environmental Officer, REO/WA _____ 1-4-01

Concurrence:

Bureau Environmental Officer: Carl D. Maxwell

Approved: ✓

Disapproved: _____

INITIAL ENVIRONMENTAL EXAMINATION

Activities Supporting Strategic Objective (SO) 1.5
A More Economically Efficient and Environmentally Sustainable Energy Sector

Program/Project Data:

Current Project Number:	110-0003, 110-0002.14
Country/Region:	South Caucasus (Armenia, Azerbaijan, Georgia)
Title of Program/Activity/Project:	SO 1.5 – A More Economically Efficient and Environmentally Sustainable Energy Sector

1. BACKGROUND AND ACTIVITY DESCRIPTION

Current joint initiative of USAID/Armenia and USAID/Caucasus is designed to support work on a regional level to create a climate of trust and confidence among the riparian [illegible] and thereby influence the riparian governments' policy and decision-making processes regarding these two river basins. Activities under this rubric would work to promote sustainable energy and environmental policy reforms and sustainable water management practices. They will be complemented by both the on going "Strengthening Regional Energy Linkages in the Caucasus" Project and the collaborative local, and national approaches that are proposed to be undertaken in coordination with this initiative.

The Strategic Objective SO 1.5 includes activities that fall under IR 1.5.4 which is increased efficiency in the energy sector through effective management of water resources as a key component of a renewable energy source to gain economic efficiency in the sector.

There are currently two phases and five tasks of activities joint initiative of USAID/Armenia and USAID/Caucasus under SO 1.5 and are as described below:

Phase 1:

Task 1: Needs Assessment – This is a 4- month activity.This technical study is a comprehensive review of the activities in water management.

Phase 2: This is a year and eight months activity.

Task 2: Strengthening the Policy, Legislative and Institutional Framework for Regional Cooperation in Water Management.
Task 3: Strengthening the Physical and Institutional Infrastructure of Water Monitoring and Management Systems. This task consists of: rehabilitating/upgrading meteorological and hydrological monitoring stations and their equipment; strengthening institutional capacities to collect, manage, store and share data on water quality and quantity; improving the organizational structures and management procedures of water monitoring institutions to develop sustainable financing of system O&M; helping to establish and foster local, regional institutional capacity for policy analysis and developing policy recommendations on water management; supporting

specific data collection and policy analysis tasks; improving and expanding use and applications of river forecast models and probabilistic model.

Task 4: Identify and Strengthen the Means to facilitate and Prepare Projects which Support Increased Regional Cooperation and Coordination. Task 4 is subdivided into two subtasks.

Task 4a: Activities under Task 4a can include small-scale pilot projects such as: clean-up of point-source pollution "hot spots"; wetlands rehabilitation and restoration, including rehabilitation of existing fish hatcheries and tourism development; conducting pilot water metering demonstration project(s); small scale irrigation and hydro-electricity projects; constructed wetlands as an alternative treatment system to deal with sewage discharges causing pollution and health problems in selected local communities; irrigation efficiency improvement demonstration with improved local water management techniques and equipment; installing check dams and other low cost water retention structures to increase groundwater recharge and reduce immediate runoff in selected sites where local wells have been adversely impacted by falling groundwater tables.

Task 4b: Other type activities under Task 4 can include: assessing various alternatives for wastewater treatment, including their impact on energy efficiency; building the capacity of local-level businesses, municipalities and NGOs to develop market-based solutions to water management problems; facilitating partnerships to increase citizen advocacy activities, public awareness and public participation; developing natural resource management activities to provide expertise and training at the national and regional levels to develop pollution response programs and monitoring systems to protect areas of environmental concern; community health improvement through participatory local public awareness campaigns and community training activities; industrial water use and energy efficiency improvement activities combined with attention to opportunities for pollution prevention and cleaner production

Task 5: Regional Meetings, Seminars and Workshops

The task includes holding regional meetings, seminars and.

2. COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Three countries of Azerbaijan, Armenia and Georgia comprise the South Caucasus with a total area of around 186, 000 km^2. Although Armenia, Azerbaijan and Georgia differ significantly in their historical and cultural background, each country was a republic in the Soviet Union (1920-1990) and accordingly each country was subjected to the same management practices. Early 90s they became independent countries and are now in the process of economic and political transformation.

The Republic of Armenia is a relatively small, mountainous, land-locked country with a total area of 29,740 km^2, located in the south-central Caucasus, sharing borders with Georgia, Azerbaijan, Iran, and Turkey. Armenia exhibits a great range of altitude variation – from 375 m to the 4,095 m peak of Mt. Aragats – and diverse climatic zones. Together these factors have resulted in a wide diversity of landscapes and ecological communities with a distinct flora and fauna.

Although Armenia accounts for only 5 % of the Caucasus area, the country incorporates nearly all types of the vegetation ecosystems found in the southern Caucasus.

The official population of the country, which is overwhelmingly ethnic Armenian, is around 3.7 million, although unofficial estimates place it at closer to 2 - 2.5 million as a result of substantial out-migration since independence. The capital of Armenia, Yerevan, is located in the fertile Ararat valley and has a population of around 1 million.

The Republic of Azerbaijan occupies the southeast part of the South Caucasus. Within its Territory lie the southeastern extension of the Greater Caucasus mountains and the eastern part of the Lesser Caucasus Mountains. Between these high mountain ranges in the northeast and southwest of the country is the broad valley of the Kura River flowing our of Georgia. This is joined by the Araks River, which flows along the border with Iran to create a broad floodplain as the two rivers flow southeast into the Caspian Sea.

The land territory of Azerbaijan is 86, 600 km^2 and borders with Russia (Dagestan), Georgia, Armenia and Iran, with an 11-km border with Turkey in the Nakhichevan autonomous republic. The elevation varies from 27 m along the Caspian coastline to 4,466 m at Mount Bazardyouru, Greater Caucasus.

The official population is over 7.5 million. Recent statistics show that 53% country's population live in cities concentrated in the Apsheron metropolitan area of Greater Baku with population 2,5000,000, including 400,000 refugees from Armenia and Karabakh.

Georgia is situated along the Black Sea, sharing borders with Turkey, Azerbaijan, Armenia and Russia. It is a mountainous country covering 69,700 km^2 with a population of 5.5 million people. The country situates between the south slope of the Caucasus Mauntains, the east coast of the Black Sea, and the northern edge of the Turkish Anatolia plain. Forests cover 40 % of the country (2.8 million ha), largely in the Greater Caucasus Mountains (Georgia's northern border), the Lesser Caucasus (its southern border), and in intervening lowlands and foothills. The principal landscapes of the Caucasus include foothills and mountain forests and sub-alpine meadows of the Greater and Lesser Caucasus, treeless mountain upland plateaus of the Lesser Caucasus, humid lowland forests of western Georgia, and the arid steppe and deserts of eastern Georgia.

The capital is Tbilisi, with a population of 1.5 million.

The major watercourse in the South Caucasus is the Kura River originating in Turkey and flowing through Georgia and Azerbaijan to the Caspian Sea. The largest tributary is the Araks River, which originates in Turkey then flows through Armenia before running along the shared border of Iran and Azerbaijan and emptying into the Kura. Both the Kura and the Araks are polluted be municipal sewage water, industrial waste, agricultural re-flows, and dump site run-offs mainly in the upstream countries of Georgia, Armenia, and Turkey. In downstream Iran and Azerbaijan, these polluted rivers are a source of serious health problems and environmental pollution of the Caspian Sea, of which Azerbaijan and Iran are littoral states.

3. EVALUATION OF ACTIVITY/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

All five activities under consideration **and/or their sub-activities dealing with 1) Training, Workshops, Conferences, Strengthening the Policy, Legislative and Institutional Framework for Regional Cooperation in Water Management; 2) Strengthening the institutional Infrastructure of Water Monitoring and Management Systems 3) Identifying the Means to Facilitate and Prepare Projects which Support; and 4) Increasing Regional Cooperation and Coordination Regional Meetings, Seminars and Workshops,** will not have an effect on the natural or physical environment, except as specified below for sub-activities directly affecting the environment and unless noted otherwise. **In such situations, the actions will be subject to a negative determination with conditions. Activities or sub-activities falling under** classes of actions listed in paragraph (c)(2) of 22 CFR 216, and **not affecting the environment qualify entirely for a categorical exclusion, as they include only activities that such as training, technical assistance, education, analysis, assessments, workshops, and seminars** except to the extent such programs include activities directly affecting the environment (such as construction) [22 CFR 216.2(c)(2)(i)].

However, any physical interventions related to implementation of small-scale pilot projects in support of regional initiatives and Physical Infrastructure of Water Monitoring and Management Systems would not qualify for a categorical exclusion. These activities will be covered by a negative determination with conditions requiring strict adherence to the requirements of section 4 of the IEE dealing with mitigation and monitoring actions.

Mitigating actions presented in the following section are proposed to ensure that environmental concerns are taken into account during both the design and implementation phases of projects.

4. RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project has reviewed the potential environmental impacts of the action summarized in the foregoing IEE. It has been determined that the activities proposed, if implemented as described, will not have a significant negative impact on the environment. To ensure compliance with USAID environmental procedures, project work plans will be approved by USAID. The environmental status of the activities will be reviewed periodically during implementation by review of activity reports and by means of routine site visits by USAID/Armenia and USAID/Caucasus staff. Any required correction in implementation will be made on the basis of these findings and in accordance with the following guidelines.

Guidelines:

The implementing organization will prepare appropriate environmental guidelines and checklists similar to the attached Environmental Assessment Checklist (Attachment 1), which will be used to identify aspects of the project activities that may have significant environmental impact. In those cases where the screening of specific activities identifies the potential for negative environmental impact, further review or a full EA, as appropriate, will be conducted. The review/EA will be carried out by the contractor under the terms of its agreement with USAID, to determine the extent of impact and possible avoidance/mitigation measures. If analysis indicates that negative environmental impacts may occur, then the project will be designed to avoid or mitigate these impacts. As an example, the implementing organization should address the following environmental concerns in case of rehabilitation and restoration of wetlands, including rehabilitation of existing fish hatcheries and tourism development; pilot water metering

demonstration project(s); small scale irrigation and hydro-electricity projects; constructed wetlands as an alternative treatment system to deal with sewage discharges causing pollution and health problems in selected local communities; irrigation efficiency improvement demonstration with improved local water management techniques and equipment; installing check dams and other low cost water retention structures to increase groundwater recharge and reduce immediate runoff in selected sites where local wells have been adversely impacted by falling groundwater tables - care must be taken to protect the habitat by insuring that materials used are safe and environmentally friendly.

The guidelines will also describe procedures used in the supervision of construction to ensure best practices on the construction sites to mitigate short-term construction related impacts.

Copies of the environmental checklists, baseline environmental surveys, and construction site monitoring reports will be kept on file by the implementing organization and will be provided to USAID for review and monitoring purposes.

Monitoring: Under the terms of its agreement, the implementing organization will be required to use the Environmental Assessment Checklist as part of the sub-contract or sub-grant selection procedures when appropriate in order to identify potential negative environmental effects, identify mitigating actions, and ensure that the recommended mitigating measures are being addressed as planned.

In addition, the implementing organization will periodically provide identified USAID/Caucasus staff with completed Environmental Status Reports that will facilitate monitoring the implementing organization's work to assure that environmental concerns are addressed in sub-grant awards. The overall process will be assured through USAID approval of sub-grant awards, review of the implementing organization's reports and assessments, and through site visits to assure that mitigating actions are actually implemented. Deviations will be reported to the Mission Environmental Officer to initiate corrective action.

All approval of the guidelines and checklist covered under this IEE shall be done by the Regional Environmental Officer (REO) based in Washington, DC for the first year of the project. After the first year, this approval responsibility will be passed on to the Mission Environmental Officer in the field.

A summary report of the status of USAID/Caucasus' compliance relative to this IEE will be sent to EE/BEO per 22 CFR 216.10 requirements (generally as part of the annual R4 process).

5.0 SUMMARY OF FINDINGS

The proposed actions for training, workshops, conferences and logistical needs supporting USAID's strategic objective, analysis, studies, workshops and meetings, support for assessments, and studies are entirely within the classes of actions listed in paragraph (c)(2) of 22 CFR 216 and therefore are *categorically excluded*. Pursuant to 22 CFR 216.2 (c)(3), the originator of the

(e) The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required.
(f) The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

APPROVAL

Project Director /Contractor-Grantee_____ Date _____
Mission Environmental Officer-USAID/ Tbilisi _____ Date _____
Regional Environmental Officer (REO)/WA_____ Date _____

ENVIRONMENTAL COMPLIANCE FACESHEET

Program / Activity Number/SO:	Strategic Objective 1.6
Country/Region:	Central Asian Republics: Kazakhstan, Kyrgyzstan, Uzbekistan, Tajikistan, and Turkmenistan
Activity Title:	Improved Management of Critical Natural Resources, Including Energy
Funding:	FY2000 – FY2005
Resource Level(s)/Amount(s):	$35 million to $50 million
IEE Prepared By:	Ken McNamara, Regional Environmental Officer, USAID/Almaty Date: March 2001
IEE Amendment (Y:/N)	No

ENVIRONMENTAL ACTION RECOMMENDED:

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
*Air___ water X_ and X_ biodiversity (Wetlands)____ human health X other___ none_X_*

Environmental Action(s) Recommended (check all that apply):
X_ 1. *Categorical Exclusion(s)*

_X_ 2. Initial Environmental Examination:

_X_ *Negative Determination:* no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:
X_ without conditions (no special mitigation measures needed; normal Good practices and engineering will be used)
___with conditions (special mitigation measures specified to prevent unintended impact)

X__ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.
X__conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

SUMMARY OF FINDINGS:

Based on the environmental review presented in this IEE, the following determinations are made:

1. A **Categorical Exclusion** is recommended for **ACTIVITY TYPE (1)**, Training and Technical Assistance in support of the proposed management of critical natural resources, including energy pursuant to 22 CFR 216.2(c)(2)(i). These activities (e.g. the development of operational guidelines and training materials) will not result in adverse environmental impacts.

*2. A **Negative Determination** (22 CFR 216.3(a)(2)(iii)* is recommended for physical interventions under **ACTIVITY TYPE (2)**. This activity include options for, installation of flow measuring devices in the Pakhtaabad main canal, and retrofitting and/or repair of systems to increase flow to the Aral Sea. This activity will not result in adverse environmental impacts.

3. A **Negative Determination with Conditions** (22 CFR 216.3(a)(2)(iii) is recommended for **ACTIVITY TYPE (3)**, *Small Scale Demonstration Projects..* All are in the development phase at present and include: Pilot Program on Salinization Mitigation, cleanup methods for oil and gas fields, build local capacity to clean up oil and gas sites, Heating System Retrofit of Facilities (Power Generation Systems and Customers) in Kazakhstan and possibly Kyrgyzstan; Public Buildings Winterization in Tajikistan and Kyrgyzstan;Bio-drainage in the Ferghana Valley and other waterlogged locations; Wetlands Management in the Aral Sea area (element one – wetlands preservation); Wetlands Management in the Aral Sea area (element two – fisheries);Wetlands Management in the Aral Sea area (element three – forestation);Wetlands Management in the Aral Sea area (element four – water management); andSmall Community Hydropowcr Project in Kyrgyzstan. These activities involve physical interventions, which could result in environmental impacts.

Because of the potential effects on the environment and the fact that the precise nature of the pilot projects are not clearly defined, the conditions presented in this IEE are intended to make certain that these activities will be implemented and monitored by the prime contractor for the Natural Resources Management Project, PA Consulting, Inc. This will be carried out in conjunction with its local partners, in a manner, which ensures that they have no significant environmental impacts.

Potential environmental impacts (identified in this IEE) of the planned activities shall be mitigated by adopting the measures detailed in Section 4.0 of this IEE. The contractor will review the environmental consequences of these demonstration projects and recommend mitigation measures before an activity is begun. They will use the Environmental Assessment checklist and/or Environment Screening Report provided by the Bureau Environment Officer (Appendix A). Their report will determine whether an environmental assessment of any specific demonstration model is warranted and will provide full environmental assessments for those demonstration models that require one.

It is anticipated that these activities will not require environmental assessments in that they entail modification or retrofitting of already existing equipment, are very small in scale, and/or are meant to mitigate previous environmental failings. The Contractor will be trained to use the criteria to conduct Environmental Reviews (ER). ERs shall be submitted to Mission Environmental Officer for approval prior to beginning rehabilitation work. The contractor will be made fully aware of, and made responsible for adhering to the environmental mitigation and monitoring requirements presented in this IEE and follow-on Environmental Reviews.

This IEE does not cover activities involving assistance for the use or procurement of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials, which will require an amended IEE submitted to EE/BEO for approval.

REVISIONS:
Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:
CLEARANCE:

Mission Director: _____ Date: 21 March 01

Cognizant Technical Officer (CTO) _____ Date: _____

CONCURRENCE:

Bureau Environmental Officer: Carl F. Maxwell Date: 4/2/01
Carl F. Maxwell

Approved: ✓

Disapproved: _____

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/PROJECT DATA:

Program Number:	Strategic Objective 1.6
Country/Region:	Central Asian Republics: Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, and Uzbekistan
Title of Program/Activity/Project/SO:	Improved Management of Critical Natural Resources, Including Energy

1.0 BACKGROUND AND PROJECT DESCRIPTION

1.1 Background

Within the Central Asian Republics, there is a slowly developing understanding that past management decisions have been narrow in focus and, while contributing to short-term economic development, have resulted in environmental disasters, e.g., the shrinkage of the Aral Sea, that have precluded sustained economic development. Policies of the old Soviet Union resulted in an economic model that could not be sustained, and demonstrated an apparent failure on the part of central planners to appreciate the "cause and effect" relationships generated by many of their policy decisions.

1.2 Project Description

In developing the new strategic objective upon which this project is based, "Improved management of critical natural resources, including energy", USAID/CAR commissioned a series of assessments and internal reviews. These assessments and reviews indicated three major categories of natural resources in the region that share common problems and are all major factors in the development of the region: water, energy, and land resources. This project seeks chiefly to address the previous failings in management of these resources, including the potential for both regional and national conflicts related to allocation and use; deficiencies in education both at the technical implementation and policy generation levels; lack of credible data; and lack of public commitment.

1.3 Purpose and Scope of IEE

This Initial Environmental Examination is necessary, as the Central Asia Natural Resources Management Project is new, representing the merger of two Strategic Objectives from USAID/CAR's previous strategy. The purpose of this IEE is to provide Reg. 216 documentation for the project. It considers areas of intervention by the contractors and its sub-contractors and -grantees using USAID funds for training, technical assistance (including illustrative small-scale demonstrations), public awareness, and mitigation of historical environmental problems.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

2.1 Country Overview

The five countries of the Central Asian Republics, Uzbekistan, Turkmenistan, Tajikistan, Kyrgyzstan, and Kazakhstan, all became independent with the fall of the USSR in 1991. Their economic and political progress as independent countries has been mixed, with civil strife, problematic neighbors (Afghanistan and Iran being the most notable), and inherited unresolved Soviet issues. For the most part, all five countries are fairly resource-rich:

- The Ferghana Valley spans the borders of Tajikistan, Uzbekistan, and Kyrgyzstan. Its agricultural riches, however, make it the bread-basket of Central Asia. Poor management of the waters upstream and downstream, however, put its fertility at risk.
- The oil fields of the Caspian Sea contribute to the wealth of Kazakhstan and Turkmenistan, and rich gas reserves dot the deserts of Turkmenistan and Uzbekistan. While a huge source of revenue for these countries, there are obvious environmental issues. Kazakhstan, for instance, is Central Asia's chief emitter of greenhouse gases.
- Tajikistan and Kyrgyzstan possess significant water resources that have the potential to generate hydroelectricity for internal uses and for export sales. Again, management of the water supply on a regional scale will be key to effectively tapping this resource.

2.2 Environmental Concern

A notable environmental concern for the region is the USSR's notorious Aral Sea disaster, the lingering effects of which are now shared by Uzbekistan and Kazakhstan, and to a lesser degree the other Central Asian nations. The Sea's two feeder rivers, the Amu Darya and the Syr Darya, begin in the glaciers and flow though all of the five republics. Other environmental concerns, as can be deduced from above, are largely with energy (including oil and gas) infrastructure issues and regional water resource management.

3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

3.1 Introduction

Many of the proposed SO 1.6 activities are either training oriented or very small-scale and as such will have little or no direct effect on the environment. There are, however, some aspects of the proposed interventions which, unless carefully implemented and monitored, could potentially result in negative environmental effects.

3.2 Activity Type 1 – Training and Technical Assistance

This SO is largely a series of disparate training and technical assistance (TA) activities that will work with energy and environmental partners to lay the groundwork for better management decisions, establish better regulatory frameworks and procedures on both regional and national

185

levels, and raise public awareness. It is managed chiefly through a prime contractor, PA Consulting, Inc., through the Natural Resources Management Project, and through other smaller activities that complement those of the prime contractor. All training and TA under this SO is, by its very nature, seen as mitigation of previous environmental failings in terms of infrastructure, policy, and apathy.

3.3 Activity Type 2 – Small-scale Pilot Projects

While project interventions related to this SO are primarily training activities a small-scale demonstration project is planned and when implemented could have a potential for environmental impact. PA Consulting intends these impacts to be positive, and to improve the deteriorating environmental condition in this region; and any unintentional or unavoidable adverse effects will be kept to an absolute minimum. The following activity may have some potential for affecting the environment:

#3, Flow Control Systems for the Syr Darya River Basin, (including installation of automatic flow control and measuring devices on the Pakhtaabad main canal, and automation flow controls at additional diversion sites) is simply a retro-fitting and/or repair of systems that are already in place or they are simple process improvements. This activity will have no impact on the river basin, but simply improves the water managers' ability to measure, monitor and control water flows, and communicate and process water data. This model demonstrates the advantages of applying more modern equipment and methodologies to the outdated Soviet system, and will ultimately increase flow to the Aral Sea. There are few adverse environmental impacts, short or long-term, envisioned as an outcome of these activities.

3.4 Activity Type 3 –Projects (to be developed)

More than any other component of the SO 1.6 program, these activities will result in direct physical effects on the environment. However, if these projects are properly designed, carefully constructed, and regularly maintained, there is likely to be a net improvement on the present conditions. Besides direct environmental impacts, these activities could result in indirect environmental impacts. The environmental criteria/environmental review process detailed in Section 4.0 will ensure that direct and indirect environmental impacts are evaluated and that negative environmental effects are minimal.

#1, the Pilot Program on Salinization Mitigation has yet to be developed. It is envisioned as a very small-scale model related to improving on-farm irrigation practices and other measures to mitigate the adverse effects of increased salinity in surface and ground waters. Currently, many of the drainage systems of the irrigated lands in Central Asia are either not working due to lack of maintenance, or are of poor design. As a result, some soils have become water logged and saline, decreasing crop production. The pilot demonstrations will show low cost ways of improving irrigation, drainage, and potable water systems and/or techniques that use water more efficiently than presently are in practice. Approaches to these demonstrations, such as alternative subsurface drainage systems, irrigation techniques, and planting practices, will be identified in conjunction with the Interstate Fund to Save the Aral Sea, the Central Asian Scientific Research Irrigation Institute (SANIIRI), and other partners. Measurement of changes in salinity over two or three growing periods using locally procured conductivity meters is also

planned. There are few adverse environmental impacts, short or long-term, envisioned as an outcome of these activities. The program will, however, involve disturbance to soil with potential for erosion, and may introduce conflicts to upstream and downstream users of irrigation water. If faulty design or lack of maintenance is provoking the rehabilitation of the irrigation system, the pilot program should address these problems so as not to be repeated in the proposed activity.

#2, the Oil and Gas Field Cleanup Pilot Projects along the Caspian Sea coast are an effort to correct previous environmental failings, primarily in abandoned oil and gas fields, through either biological or thermal remediation techniques. Based on extensive groundwater and soils tests at selected oil field locations, and on discussions involving oil companies, nearby communities, NGOs, regulators, and other stakeholders, options for cleanup methods will be weighed and prioritized. Operational guidelines and training materials for oil field management and cleanup procedures will be developed for regulatory officials and other stakeholders who should be involved in cleanup initiatives. The model will leverage resources available from regional oil and gas ventures and build local capacity to clean up oil and gas sites. There are few adverse environmental impacts, short or long-term, envisioned as an outcome of these activities.

#4, Heating System Retrofit of Facilities (Power Generation Systems and Customers) in Kazakhstan, and possibly Kyrgyzstan, entails the modernization of antiquated equipment in existing buildings, and related measures that will improve the operational efficiency of municipal heating systems. Most cities in Central Asia provide heat through a city-wide hot water system. Heating efficiency was not a concern to builders of the Soviet era, and heating equipment is now generally outdated or not properly maintained. This model will take two very similar apartment blocks and demonstrate the savings potential of simple individual thermostats and of more efficient heat exchanges in buildings. Local contractors and engineers will be trained in the methods and techniques of this system. The contractor will assure the proper disposal of replaced equipment to a designated landfill.

#5, Public Buildings Winterization in Tajikistan and Kyrgyzstan will introduce small-scale, low-cost interventions to reduce energy consumption initially in public buildings and possibly later in private dwellings. It is unknown at this time the specific materials that will be used for the project, but they will be locally available and non-asbestos-based. The environmental criteria/environmental review process detailed in Appendix A will ensure that direct and indirect environmental impacts are evaluated and that negative environmental effects are minimal.

#6, Bio-drainage models in the Ferghana Valley will use indigenous trees and other local vegetation to lower the ground water tables in waterlogged lands. Overuse of irrigation water has led to soils that are damaged due to salinization and water moving to the topsoil layers. This has reduced agricultural productivity and structural damage to buildings. The trees will be planted in such a way that they act as a biological pump, lowering the water table. It will benefit the environment in that biodiversity will increase and soils will revert to a more natural state. The system is far less disruptive than using vertical drainage systems, creating drainage ditches, or laying subsurface drainage pipes. The species presently envisioned for this model are native trees. There are few adverse environmental impacts, short or long-term, envisioned as an outcome of these activities. The program could, however,involve the propagation of exotic as well as native tree species, and if not well designed or monitored this could result in uncontrolled

181

spread of a particularly aggressive species or in the introduction of new pests into an area. Some mitigation measures are detailed in the next section.

#7, Wetlands Management in the Aral Sea area (element one – improving livelihoods in the wetlands) will provide models of economic opportunities for people and communities located in the delta region of the Aral Sea. Tentative activities will include promotion of environmental tourism near some of the existing lakes of the delta, some limited agricultural models, and more controlled camel husbandry practices in the surrounding areas. Environmental tourism will be an inevitable increase in traffic on the community roads. This will likely result in an increase in dust, noise, and possibly traffic accidents. In addition, there may be a greater population concentrated along the road. Animal husbandry basically entails feeding camels in corrals, rather than allowing them to free-range, thereby increasing the now minimal indigenous plant life. Little negative environmental impact is anticipated as a result of the concentration of animal waste near homesteads. Some mitigation measures are detailed in the next section. Environmental impact will be minimal because the activity represents an upgrade of poor practices now in place.

#8, Wetlands Management in the Aral Sea area (element two – fisheries) will improve the production of indigenous fish species (sturgeon, carp, silver carp, and amur) in the delta lakes to strengthen the local fisheries industry. Assessments are now underway for the upgrading of two separate fisheries on smaller lakes in the Syr Darya delta. This will be followed by installation of aerators, nets, and oxygen supply and feeding equipment. Earthen ponds will be rehabilitated as the hatchery grows. Species and sizes will be continually monitored. The activity will have a minimal environmental impact in that it is an upgrade of an existing facility and will not require new construction. New species of fish will not be introduced. The existing facility has been allowed to deteriorate.

#9, Wetlands Management in the Aral Sea area (element three – forestation) will introduce green belts and urban forestation techniques using local plant species in the vicinity of the receding shoreline of the Aral Sea and the town of Aralsk in order to mitigate the rapid denuding of the soils. Native species of trees will be used. This activity will demonstrate how trees can reduce wind erosion on the former Aral Sea bed and improve the quality of life for people living in areas where windstorms frequently blow dust (with harmful salts and chemical residues) into the atmosphere. Tree seedlings will be watered and protected during the first 2 years by the local government administration. The program could, however, involve the propagation of exotic as well as native tree species, and if not well designed or monitored this could result in uncontrolled spread of a particularly aggressive species or in the introduction of new pests into an area. Some mitigation measures are detailed in the next section.

#10, Wetlands Management in the Aral Sea area (element four – irrigation management) will rehabilitate the Baskara Irrigation Canal that brings water to an agricultural area and to a Syr Darya delta lake. The activity will demonstrate how low-cost canal maintenance and adoption of water saving irrigation techniques can preserve wetland water resources and improve economic opportunities. The activity will have minimum environmental impact because it is rehabilitating an existing canal and will help to restore the hydrology and ecological balance of the lake in the delta. The program will, however, involve disturbance to soil with potential for erosion, and may introduce conflicts to upstream and downstream users of irrigation water. If faulty design or lack

188

of maintenance is provoking the rehabilitation of the irrigation system, the pilot program should address these problems so as not to be repeated in the proposed activity.

#11, Small Community Hydropower Project in Kyrgyzstan will use existing small dams and generators to bring reliable, lower-cost power to local communities. It is anticipated that this will have minimum environmental impact due to its small size, plus it is an upgrade of existing facilities demonstrating the use of low-cost modern equipment for replacing old equipment in disrepair.

The upgrade of existing facilities have elements that could conceivably result in some limited and temporary adverse impacts on the environment due to limited small-scale construction and the manipulation of water and disposal of old equipment. The wetlands demonstration models are part of a larger World Bank sponsored activity, for which an exhaustive World Bank environmental assessment was performed. The mitigation measures identified in this assessment will be included in the contractor requirements in this activity.

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

Because the precise nature of these projects are not clearly defined, the prime contractor for the Natural Resources Management Project, PA Consulting, Inc., will review the environmental consequences of these demonstration projects and recommend possible mitigation measures before an activity is begun. They will use the Environmental Assessment checklist and/or Environment Screening Report included in Appendix A. Their report will determine whether an environmental assessment of any specific demonstration model is warranted and will provide full environmental assessments for those demonstration models that require one. In the event that an environmental assessment is warranted for any portion of these activities, USAID/CAR will work with their procurement officer to develop a task order or contract with an appropriate firm.

4.1 Specific Mitigation Measures

- To the extent that tree, shrub, or grass varieties are introduced into the area, PA Consulting Inc. will ensure that these are non-nuisance varieties approved by the respective country government Ministry of Agriculture.
- Only native trees will be used where trees are planted
- New tree seedlings will be watered and protected during the first two years
- In association with the promotion of zero grazing activities, training will emphasize the need for proper handling of animals and animal waste.
- Measurements of changes in salinity over two or three growing periods will be done.
- Replaced and/or discarded equipment/materials will be disposed in designated landfill approved by local authorities.
- No new species of fish will be introduced
- Local contractors and engineers will be trained in the methods and techniques for all new systems.
- No asbestos-based materials will be used.
- Only indigenous fish species will be used in the improvement of fisheries in lakes and rivers.

- Canal maintenance and operation plans will be included in all canal rehabilitation projects and local personnel trained accordingly.
- Mitigation measures identified in the Wold Bank environmental assessment will be incorporated and carried out by PA Consulting Inc.

4.2 Environmental Screening and Review

The full spectrum of environmental impacts for the activities under SO 1.6 can only be evaluated and mitigated on a site-specific basis. Most importantly, to assess indirect and cumulative impacts of these activities, site specific information is necessary.

Therefore, this IEE sets up an umbrella process of environmental review. Environmental screening and review process is developed (Appendix A) to guide a reviewer through a site-specific Environmental Review (ER). An ER will be conducted for each project activity, and submitted for Mission Environmental Officer (MEO) approval prior to beginning repair and/or rehabilitation activities. The umbrella process will ensure that the environmental procedures are implemented; and that site-specific analysis is conducted, environmental concerns are assessed, potential impacts mitigated, and indirect and cumulative effects are considered for each activity.

4.3 Promotion of Environmental Review and Capacity Building

The prime contractor for the Natural Resources Management Project, PA Consulting, Inc. will carry out most of the activities through a variety of contract and sub-grant arrangements with local implementing partners. While these local partners will be given comprehensive responsibility for implementation of various project activities, the objective and detailed scope of work for a given activity will be clearly established. Contracts, letters of understanding, and other types of formal agreements will be the norm. Within this framework, relevant environmental mitigation and monitoring measures established in this IEE will be incorporated into the agreements with PA Consulting and its agreements with local partners.

4.4 Monitoring and Evaluation

During the life-of-project implementation period, PA Consulting is required to monitor and evaluate the project's success against indicator benchmarks. PA Consulting will be required to design a Monitoring and Evaluation Plan which will incorporate the monitoring and environmental indicators into this program. Specifically, PA Consulting will carry out the following monitoring activities related to the listed activities of this IEE.

- PA Consulting will monitor the type and mix of trees and shrubs which being used to ensure they are well tested, non-nuisance varieties approved by the Ministry of Agriculture.
- Where zero-grazing of camels have been promoted, PA Consulting will monitor the sanitary conditions in and around animal enclosures, and if determined to be necessary, will initiate additional training in the proper handling of animals and animal waste.
- During the design, layout, and construction/rehabilitation of facilities, wetlands, canals, PA Consulting will monitor activities to ensure that the recommended mitigation measures are incorporated into the work, and that ERs are carried out as required.

- The integrity of the completed improvements to dams and canals will be checked after the first heavy rain and at 3-month intervals for one year. Specific indicators that will be monitored include formation of soil erosion on canal banks; stability of cut and fill slopes; reestablishment of vegetation.
- PA Consulting will take responsibility for coordinating any remedial action which is required within the first year of completion of improvements.
- Upon completion of each activity, PA Consulting will formally notify the Local authorities that it is officially responsible for implementing the maintenance program according to the established agreement. After three months this will be followed up to confirm that appropriate arrangements have been made.
- PA Consulting will monitor the implementation of any mitigation measures required and/or conduct additional monitoring as required in the site-specific ERs.

5.0 SUMMARY OF FINDINGS

Based on the environmental review presented in this IEE, the following determinations are made:

1. A **Categorical Exclusion** is recommended for ACTIVITY TYPE (1), Training and Technical Assistance (e.g. the development of operational guidelines and training materials) in support of the proposed management of critical natural resources, including energy pursuant to 22 CFR 216.2(c)(2)(i). These activities will not result in adverse environmental impacts.

2. A ***Negative Determination*** *(22 CFR 216.3(a)(2)(iii)* is recommended for physical interventions under ACTIVITY TYPE (2). This activity include installation of flow measuring devices in the Pakhtaabad main canal, and retrofitting and/or repair of systems to increase flow to the Aral Sea. These activities will not result in adverse environmental impacts.

3. A ***Negative Determination with Conditions*** *(22 CFR 216.3(a)(2)(iii) is recommended for* ACTIVITY TYPE (3*),* Small Scale Demonstration Projects. All are in the development phase at present and include: Pilot Program on Salinization Mitigation, options for cleanup methods for oil and gas fields, build local capacity to clean up oil and gas sites, Heating System Retrofit of Facilities (Power Generation Systems and Customers) in Kazakhstan and possibly Kyrgyzstan; Public Buildings Winterization in Tajikistan and Kyrgyzstan; Bio-drainage in the Ferghana Valley and other waterlogged locations; Wetlands Management in the Aral Sea area (element one – wetlands preservation); Wetlands Management in the Aral Sea area (element two – fisheries); Wetlands Management in the Aral Sea area (element three – forestation);Wetlands Management in the Aral Sea area (element four – water management); and Small Community Hydropower Project in Kyrgyzstan. These activities involve physical interventions, which could result in environmental impacts.

Because of the potential effects on the environment and the fact that the precise nature of the pilot projects are not clearly defined, the conditions presented in this IEE are intended to make certain that these activities will be implemented and monitored by the prime contractor for the Natural Resources Management Project, PA Consulting, Inc. This will be carried out in conjunction with its local partners, in a manner, which ensures that they have no significant environmental impacts.

Potential environmental impacts (identified in this IEE) of the planned activities shall be mitigated by adopting the measures detailed in Section 4.0 of this IEE. The contractor will review the environmental consequences of these demonstration projects and recommend mitigation measures before an activity is begun. They will use the Environmental Assessment checklist and/or Environment Screening Report provided by the Bureau Environment Officer (Appendix A). Their report will determine whether an environmental assessment of any specific demonstration model is warranted and will provide full environmental assessments for those demonstration models that require one. It is anticipated that these activities will not require environmental assessments in that they entail modification or retrofitting of already existing equipment, are very small in scale, and/or are meant to mitigate previous environmental failings. The Contractor will be trained to use the criteria to conduct Environmental Reviews (ER). ERs shall be submitted to Mission Environmental Officer for approval prior to beginning rehabilitation work. The contractor will be made fully aware of, and made responsible for adhering to the environmental mitigation and monitoring requirements presented in this IEE and follow-on Environmental Reviews.

This IEE does not cover activities involving assistance for the use or procurement of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials, which will require an amended IEE submitted to EE/BEO for approval.

REVISIONS:
Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

IEE/SO1.6
Drafted: LHarvey, OEEI
Draft Clearances:
JStarnes, OEEI_____
KMcNamara, Regional Environmental Officer_____

Note: File under CMax: 216-OEEI2b.DOC

APPENDIX A

ENVIRONMENTAL SCREENING & REPORT FORM FOR UMBRELLA IEE COMPONENTS

Background: The present Environmental Screening and Reporting Form (ESF) is designed to be consistent with the Initial Environmental Examination process, and to assist USAID Missions and their implementing partners design and implement activities in an environmentally sound manner in accordance with all salient agency policies and procedures. Use of the ESF will greatly reduce the need for review and approval of activities at the regional or Washington levels.

Introduction to Use of this Form: This *form is intended to be adaptable to unique circumstances*. Thus, its final contents and conditions of use are to be refined and jointly determined among the affected partners including PVO, NGO, USAID, host country agencies, etc. To the extent possible, the form should reflect host government environmental policies and procedures.

In using it, adjustments can be made in consultation with the Regional Environmental Officer and Bureau Environmental Officer. It is strongly advised that the Mission Environmental Officer make on-site visits prior to finalization of the ESF, and that the ESF be rational and fully defensible and without ambiguity as to how the conclusion was reached that the activity (ies) will have no significant impact.

ENVIRONMENTAL SCREENING/REPORT FORM FOR ACTIVITIES & GRANT PROPOSALS

Implementor: _____

Other Implementing Partner(s)[if Appropriate]_____

Activity Name: _____

Duration (proposed start and completion dates): _____

Geographic Location: _____

Activity Description (paragraph(s) describing purpose/outputs and potential environmental impacts):

[add space as needed]

Determine the Nature of the Activity

a. **Environmental Review Report Needed.** Does the activity include funds to support any physical natural resource management activities (e.g., land clearing, irrigation), or any community and rural development services (e.g., agroforestry, tree-planting), infrastructure (e.g., dams or water catchments), public facilities (e.g., water and sanitation systems), road construction or rehabilitation? Does it involve development of income-generating or resource management systems? It will likely require an Environmental Review of the kind described in Step 4 of this form. Determine which Category the activity falls under, to establish the need for the Environmental Review.

b. **No Further Environmental Review Required.** Does the activity exclusively provide technical assistance, training, institutional strengthening, or research, education, studies or other information analysis, awareness-

building or dissemination activities *with no foreseeable negative impact on the biophysical environment*? This probably qualifies as a Category 1 activity—no further environmental review or action may be necessary. Complete form to establish this circumstance.

c. **Multiple Categories.** Many activities will have components in more than one category. Simply mark all that apply. The form will guide you to the appropriate next steps.

Step 1. Determine Category of Activity.

- ***Category 1* – no further environmental review needed:**

***Does the activity involve (mark yes, if applicable)*:**

___ Provision of education, technical assistance, or training. Does *not* qualify for "Category 1" if such Programs include activities directly affecting the environment.
___ Community awareness initiatives.
___ Controlled experimentation exclusively for the purpose of research and field evaluation confined to small areas (normally under 4 ha., i.e., 10 acres) and carefully monitored (when no protected or other sensitive environmental areas could be affected).
___ Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.
___ Document or information transfers.
___ Nutrition, health care or family planning. Such programs do *not* qualify for "Category 1" if (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazards (esp. HIV/AIDS) waste is handled or blood is tested.
___ Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices (when no protected or other sensitive environmental areas could be affected). *Note that USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.*
___ Construction or repair of facilities if total surface area to be disturbed is under 10,000 sq. ft. (approx. 1,000 sq. m.) (*and* when *no* protected or other sensitive environmental areas could be affected).
___ Support for intermediate credit arrangements (when *no* significant biophysical environmental impact can reasonably be expected).
___ Programs of maternal and child feeding conducted under Title II of Public Law 480.
___ Food for development programs under Title III of P.L. 480, when <u>no</u> on-the-ground biophysical interventions are likely.
___ Studies or programs intended to develop the capability of recipients to engage in development planning. Do *not* mark "yes" if these involve activities directly affecting the environment.

***Category 2* – Negative environmental impacts possible, environmental review required (specific conditions, including monitoring, may be applied):**

Note: The Environmental Review (Step 4 below) must address why there will be no potential adverse impacts on protected areas, endangered or threatened species or their critical habitat; or relatively undegraded forest, i.e., justify your conclusion that the proposed Category 2 activities do not belong in Category 3 or 4. Even for activities designed to protect or restore natural resources, the potential for environmental harm exists (e.g., re-introduction of species, controlled burning, fencing, wildlife water points, spontaneous human population shifts in response to activities undertaken, etc.). *If you do not find an exact match listed here for the activity you are undertaking, and it is not in Category 1, 3 or 4, then use the last item in Category 2 to describe the activity and treat it as Category 2 for purposes of environmental review.*

***Does the activity involve (mark yes, if applicable)*:**

___ Small-scale activities in agriculture, NRM, sanitation, etc. (*list and scale to be defined mutually among the appropriate partners* -- NGO, donor, host country agencies, etc.).

195

___ Controlled experimentation exclusively for the purpose of research and field evaluation *(areas of 4 ha. or more,* i.e., 10 acres) and carefully monitored, when neither protected or other sensitive environmental areas could be adversely affected nor threatened and endangered species and their habitat jeopardized.

___ Small-scale construction or rehabilitation of facilities or structures in which the surface area to be disturbed exceeds 10,000 sq. ft and funding level is not in excess of $200,000 and where no protected or other sensitive environmental areas could be affected.

___ Minor construction or rehabilitation of rural roads less than ca. 10 km (with no change in alignment or right of way), with ecologically sensitive areas at least 100 m away from the road and not affected by construction or changes in drainage; likewise, no protected areas or relatively undegraded forest should be within 5 km of the road.

___ Nutrition, health care or family planning, *if* (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazardous (esp. HIV/AIDS) *waste is handled or blood is tested.*

_____ Construction or rehabilitation of small-scale water points or water storage devices for domestic or non-domestic use, not covered in Category 1, when neither protected or other sensitive. environmental areas could be adversely affected nor endangered and threatened species jeopardized *Note that USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.*

___ Quantity imports of commodities such as fertilizers.

___ Food for Development programs under Title II or III, involving known biophysical interventions with potential to cause environmental harm (e.g., roads, bore holes).

___ Support for intermediate credit institutions when indirect environmental harm conceivably could result .

___ Institutional support subgrants to NGOs/PVOs when the activities of the organizations are known and raise the likelihood of some environmental impact.

___ Technical studies and analyses and other information generation activities that could involve intrusive sampling, including aerial surveys, of endangered species or critical habitats.

___ Small-scale use of USEPA-registered least-toxic *general-use pesticides*, limited to CNFA/NGO-supervised use by farmers, demonstration, training and education, or emergency assistance. Environmental review must be carried out consistent with USAID Pesticide Procedures as required in Reg. 16 [22 CFR 216.3(b)(1)].

___ Other activities not in Category 1 and not in Category 3 or 4. Specify:_____

_____

_____

Were the following used by the PVO/NGO in designing the above Category 2 activities (mark yes, if applicable)?

Any applicable Programmatic Environmental Assessments: _____

_____

Other(s):_____

- ***Category 3* – Significant environmental impacts likely. Environmental review required, and Environmental Assessment likely to be required:**

Does the activity involve (mark yes, if applicable):

___ River basin or new lands development

___ Planned resettlement of human populations

___ Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas

___ Substantial piped water supply and sewerage construction

___ Major bore hole or water point construction

___ Large-scale irrigation

___ Water management structures such as dams and impoundment's

___ Drainage of wetlands or other permanently flooded areas

___ Large-scale agricultural mechanization

196

___ Agricultural land leveling
___ Procurement or use of restricted use pesticides, or wide-area application in non-emergency conditions under non-supervised conditions
___ Light industrial plant production or processing (sawmill operation, agro-industrial processing of forestry products)
___ Potential to significantly degrade protected areas, such as introduction of exotic plants or animals
___ Potential to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)

The above Category 3 activities are consistent with USAID criteria for activities that normally require a USAID-specific document with a defined format and procedure, called the Environmental Assessment (EA). It is recognized that some of these categories are ambiguous. Mark "yes" if they apply, and show in the Environmental Review (Step 4) the extent and magnitude of activities and their impacts, so that USAID and its partners can determine if an EA is necessary or not.

- ***Category 4* – Activities not fundable or fundable only when specifically defined findings to avoid or mitigate the impacts are made, based on an Environmental Assessment[1]:**

  ***Does the activity* involve (yes, no, N/A):**

___ Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals
___ Actions determined likely to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)[2]
___ Conversion of forest lands to rearing of livestock
___ Planned colonization of forest lands
___ Procurement or use of timber harvesting equipment
___ Commercial extraction of timber

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1 **Per Foreign Assistance Act Sect. 118 & 119 relating to overseas assistance affecting Tropical Forestry and Biodiversity.**

2 **Per USAID Environmental Procedures, §22 CFR 216.5, on Endangered Species**

___ Construction of dams or other water control structures which flood relatively undegraded forest lands
___ Construction, upgrading or maintenance of roads (including temporary haul roads for logging or other extractive industries) which pass through relatively undegraded forest lands.

Step 2. Summarize and Itemize Activities. List activities by all categories to which *Yes* was answered.

Category of activities as determined below (add entries as required):

Activity/Sub-Activity	Funding:	Category

Step 3. Determine Need to Prepare Environmental Review.

If all activities are in Category 1, sign and date the form. For any activities in Category 2 and 3, prepare an Environmental Review Report assessing all of these activities' impacts. For Category 3 activities, further documentation would be required, once USAID has confirmed the applicability of Category 3, based on the Review. If Category 4 is possible, consult USAID before proceeding with the Environmental Review to determine if activities can be funded and/or whether required EA findings could be made.

For all Category 2 and 3 activities, proceed to Step 4 to prepare Environmental Review.

Step 4. Prepare Environmental Review.

Suggested Format for Environmental Review

The Environmental Review should be about 5-10 pages long (more if required) and consist of following sections:

1. **Background, Rationale and Outputs/Results Expected** -- summarize and cross-reference proposal if this review is contained therein.

2. **Activity Description** -- Succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during construction, how intervention will operate and any ancillary development activities that are required to build or operate the primary activity (e.g., road to a facility, need to quarry or excavate borrow material, need to lay utility pipes to connect with energy, water source or disposal point or any other activity needed to accomplish the primary one but in a different location). If various alternatives have

been considered and rejected because the proposed activity is considered more environmentally sound, explain these.

3. **Environmental Situation** -- Affected environment, including essential baseline information available for all affected locations and sites, both primary and ancillary activities.

4. **Evaluation of Activities and Issues with Respect to Environmental Impact Potential** -- Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with restoring or reusing the site, if the facility or activity were completed or ceased to exist. Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.) Indicate positive impacts and how the natural resources base will be improved on a sustainable basis.

5. **Environmental Mitigation Actions** (including **monitoring** and **evaluation**) -- For example, indicate means taken to avoid, reduce or compensate for impacts, such as restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents. Indicate how mitigative measures will be monitored to ensure that they accomplish their intended result or what monitoring might be needed for impacts that one is uncertain about.

6. **Other Information** (as appropriate) -- where possible, include photos of the site and surroundings; list the names of any reference materials or individuals consulted.

Note: Specific plans for monitoring of key environmental indicators and mitigation of impacts during activity implementation are especially important; these must be addressed in the review. Information on monitoring results and mitigation of impacts are to be included in all progress reports. Important information and a criterion for evaluation of environmental soundness is showing how the activity is part of or guided by an integrated, community-based resource and land use plan or planning and management framework that considers the appropriate use of multiple resources.

Drafted by: _____ Date:

Reviewed by: _____ Date:

Clearances: (modify as appropriate)

Project Officer: _____ Date:

MEO (including recommendation that an EA be prepared, if called for):
_____ Date:

USAID Mission Director (if responsibility not delegated to MEO):
_____ Date:

199

ENVIRONMENTAL ASSESSMENT CHECKLIST

It is recommended that the Mission Environmental Officer or Regional Environmental Officer make on-site visit to validate the checklist that will be prepared by the implementers of the grant and/ or a subgrant.

The purposes of this *Environmental Assessment Checklist (EA Checklist)* are to determine whether the proposed action (scope of work) encompasses the potential for environmental pollution or damage and, if so, to determine the scope and extent of additional environmental evaluation, mitigation, and monitoring necessary to fulfill federal U.S. environmental requirements. The *EA Checklist* is intended to be used in conjunction with a brief Project Description prepared by the Project Director.

ENVIRONMENTAL CONSEQUENCES: Check appropriate column as Yes (Y), Maybe (M), No (N) or Beneficial (B). Briefly explain Y, M and B checks in next Section, "Explanations". A "Y" response does not necessarily indicate a significant effect, but rather an issue that requires focused consideration,

Y, M, N or B

1. **Earth Resources**
   a. grading, trenching, or excavation > 1.0 hectare ___
   b. geologic hazards (faults, landslides, liquefaction, non-engineered fill, etc.) ___
   c. contaminated soils or ground water on the site ___
   d. offsite overburden/waste disposal or borrow pits required > 1.0 ton ___
   e. loss of high-quality farmlands > 10 hectares ___

2. **Agricultural and Agrochemical**
   a. impacts of inputs such as seeds and fertilizers ___
   b. impact of production process on human health and environment ___
   c. Other adverse impacts ___

3. **Industries**
   a. impacts of run-off and run-on water
   b. impact of farming such as intensification or extensification ___
   c. impact of other factors ___

4. **Air Quality**
   a. substantial increase in onsite air pollutant emissions (construction/operation) ___
   b. violation of applicable air pollutant emissions or ambient concentration standards ___
   c. substantial increase in vehicle traffic during construction or operation ___
   d. Demolition or blasting for construction ___
   e. substantial increase in odor during construction or operation ___
   f. substantial alteration of microclimate ___

5. **Water Resources and Quality**
   a. river, stream or lake onsite or within 30 meters of construction ___
   b. withdrawals from or discharges to surface or ground water ___
   c. excavation or placing of fill, removing gravel from, a river, stream or lake ___
   d. onsite storage of liquid fuels or hazardous materials in bulk quantities ___

6. **Cultural Resources**
   a. prehistoric, historic, or paleontological resources within 30 meters of construction ___
   b. site/facility with unique cultural or ethnic values ___

7. **Biological Resources**
   a. vegetation removal or construction in wetlands or riparian areas > 1.0 hectare ___
   b. use of pesticides/rodenticides, insecticides, or herbicides > 1.0 hectare ___
   c. Construction in or adjacent to a designated wildlife refuge ___

300

8. **Planning and Land Use**
   a. potential conflict with adjacent land uses ___
   b. non-compliance with existing codes, plans, permits or design factors ___
   c. construction in national park or designated recreational area ___
   d. create substantially annoying source of light or glare ___
   e. relocation of >10 individuals for +6 months ___
   f. interrupt necessary utility or municipal service > 10 individuals for ÷6 months ___
   g. substantial loss of inefficient use of mineral or non-renewable resources ___
   h. increase existing noise levels >5 decibels for ÷3 months ___

9. **Traffic, Transportation and Circulation**
   a. increase vehicle trips >20% or cause substantial congestion ___
   b. design features cause or contribute to safety hazards ___
   c. inadequate access or emergency access for anticipated volume of people or traffic ___

10. **Hazards**
   a. substantially increase risk of fire, explosion, or hazardous chemical release ___
   b. bulk quantities of hazardous materials or fuels stored on site ÷3 months ___
   c. create or substantially contribute to human health hazard ___

11. **Other Issues**
   a. Substantial adverse impact ___
   b. Adverse impact ___
   c. Minimal impact ___

EXPLANATION: explain Y, M and B responses

RECOMMENDED REVIEW, MITIGATION AND MONITORING MEASURES

RECOMMENDED ACTION (Check Appropriate Action):

(a) The project has no potential for substantial adverse environmental effects. No further environmental review is required.
(b) The project has little potential for substantial adverse environmental effects, however the recommended mitigation measures (listed above) will be implemented. No further environmental review is required.
(c) The project has substantial but mitigatable adverse environmental effects and required measures to mitigate environmental effects (listed above) will be will be implemented.
(d) The project has potentially substantial adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared.
(e) The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required.
(f) The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

APPROVAL

Project Director/ Chief of Party _____ Date _____

201

ENVIRONMENTAL COMPLIANCE FACESHEET

Activity/Activity Number: Serbia Electricity Supply Program (SESP), 169-0005

Country/Region: Serbia (Federal Republic of Yugoslavia)

Funding Period: 11/2000 – 3/2001

Amount: $10 million

Statement Prepared by: Sidney Chernenkoff, December 5, 2000
EE/OM, Program Operations Officer

IEE Amendment (Y/N)? No. **Date of Original IEE:** _____

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
*air*___ *water*___ *land*___ *biodiversity* (specify)_____ *human health*____ *other*____ *none*__X__

Environmental Action(s) Recommended (check all that apply):

_____ 1. *Categorical Exclusion*(s)

__X__ 2. Initial Environmental Examination:

__X__ *Negative Determination*: no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:
__X__ without conditions (no special mitigation measures needed; normal good practices and engineering will be used)
____ with conditions (special mitigation measures specified to prevent unintended impact)

____ *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.
____ conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

____ *Positive Determination*: IEE confirms potential for significant adverse effect of
____ EA to be / being / has been (circle one) conducted. Note that the activities affected cannot go forward until the EA is approved.

____ *Deferral:* one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved. Briefly describe the nature of the deferred activities:_____

Summary of Findings:

The Milosevic years have left Serbia's energy sector in desperate need of investment and attention to basic operations and maintenance. The Serbia Electricity Supply Program will help ensure that adequate electricity is available for households to provide heating for winter 2000. Although Serbia produces some domestic oil, gas, coal and hydro electricity, it is highly dependent on imported energy. Though Serbia has been routinely importing electricity, there is now a shortage of funds, and many households will face winter without heat. The program is being coordinated with 42 million Euros in aid provided by the European Union, covering energy needs for the 2000-2001 winter.

The $10 million of USAID funds will be used to pay suppliers in neighboring countries for the electricity imported into Serbia. Electricity will be provided through existing electric grids. No new construction or rehabilitation of power lines or equipment is included. Imported electricity enters Serbia through high voltage transmission lines. While the source of this electricity cannot be pinpointed, a review of the electricity mix of neighboring countries indicates that the mix of sources is similar to Serbia's.

As provided for under USAID Environmental Procedures 22 CFR Part 216, Section 216.3 (a)(2),iii, this activity qualifies for a negative determination without conditions because there are no significant adverse environmental effects expected during the life of the activity (see IEE).

This negative determination applies to USAID payment for electricity imports. Under this program, the government in Serbia will purchase electricity from one or more countries and then forward those bills to USAID for payment. USAID will have no prior knowledge or control over which suppliers are selected nor control over the details of the provision of the electricity.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:

Clearance:

EE/OM, Gloria Steele: Gloria O Steele Date: 12/11/00

Concurrence:

EE/EEST, Carl Maxwell:
Bureau Environmental Officer: _____

Approved: Carl F. Maxwell 12/11/2000

Disapproved: _____

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/PROJECT DATA:

Program Number: 169-0005

Country/Region: Serbia (Federal Republic of Yugoslavia)

Title of Program/Activity/Project: Serbia Electric Supply Program

1.0 BACKGROUND AND PROJECT DESCRIPTION

The Serbia Electricity Supply Program will help ensure that adequate electricity is available for households and eligible entities, such as schools and hospitals, to provide heating for winter 2000.

The program is being coordinated with aid provided by the European Union, covering energy needs for the 2000-2001 winter. The $10 million in SEED funds under this program will be used to pay for the electricity imported into Serbia. Program funds will be paid directly by USAID to appropriate suppliers of electricity outside Serbia. Funds will not be converted to dinars or placed in the Central Bank of Serbia. No local currency will be generated. The electricity financed under this program is included within the portion of household electricity that is provided as a subsidy under existing practice by the government in Serbia.

This program will reduce the cost of electricity imports paid by the government in Serbia and raise the amount of heating energy available. Households using electricity for heat will be the largest group benefiting from this program. Users of state institutions, other than military and police, may also benefit.

1.0 COUNTRY AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Following the popular uprising in early October, the Federal Republic of Yugoslavia (FRY)[1] has taken steps to consolidate its government and normalize relations with other nations, including the United States. On November 4, 2000, Yugoslavia's parliament approved the country's first communist-free government in more than half a century ending years of isolation and decline under former President Slobodan Milosevic.

The energy sector was an important tool of the Milosevic regime. It was used to control key areas of the economy; to pacify the population with subsidies and free service; to divert resources from transactions into personal bank accounts; and intimidate and punish political opponents, municipalities and Montenegro.

Since 1992, the FRY has faced various sanctions on international trade and financial transactions. These sanctions have depleted energy reserves and the fiscal capacity to purchase energy imports. Both foreign and domestic energy supplies have been reduced over the past two years, leading to

[1] The Federal Republic of Yugoslavia consists of two republics, Serbia and Montenegro. For the purposes of this Memorandum, FRY and Serbia are used interchangeably. Montenegro is not receiving assistance under this program.

a danger of inadequate heating in the winter months of 2000-2001. Load shedding and rolling brownouts are already common across Serbia.

There has also been a substantial decline in Serbia's domestic capacity to produce energy. Hydroelectric productive capacity has declined in the short-run due to the extreme drought in 2000. On the thermal side, The economic decline has reduced the capacity of the physical plant due to poor maintenance. In addition, direct damage to production facilities incurred during the bombing in 1999 has not been fully repaired.

Although Serbia produces some domestic oil, gas, coal and hydro electricity, it is highly dependent on imported energy. Gas is imported primarily from Russia, while oil can come from the Adria Pipeline from Rijeka; up the Danube on barges; and from Hungary by rail. The Milosevic years have left an energy sector in desperate need of investment and attention to basic operations and maintenance.

Given the legacy of the Milosevic regime and the political and economic difficulties facing the new government, this could be a harsh winter for Serbia. Dealing with this legacy in the energy sector poses a major problem for President Kostunica. Energy will be critical to sustaining popular support, rekindling the economy and creating jobs, and meeting humanitarian needs. Municipalities are faced with critical shortages of fuel and limited budgets for municipal services.

The new government faces the upcoming winter with a shortage of fuel, money, generating capacity, equipment, and municipal funds for fuel. Households consume most of the electricity in Serbia. In recent years, a majority of Serbian households have converted to electricity as a source of heat. If electricity demands cannot be met, thousands of Serbs may face this winter without heat.

Load shedding of four hours a day in Belgrade and six or more hours elsewhere is already occurring. In addition to residences, schools and hospitals also face shortages of fuel and are not well insulated to protect students and patients from the cold and allow teachers and doctors to perform their duties. So far, the EU has provided at least $10 million in fuel and energy weatherization for hospitals and orphanages, and is planning additional support. Much less has been done in schools.

Moreover, energy import costs for the upcoming winter are estimated at $474 million while Serbia's foreign exchange reserves are currently only about $400 million. It is not clear whether IMF membership and a stand-by agreement can be negotiated in time to help with energy import costs this winter. The UNHCR is playing a key in-country role in monitoring winter and near-term needs and as a clearinghouse of information on the sector and assistance programs of various donors. Also, the World Bank may not be able to resume lending due to massive arrears of $1.8 billion.

This activity is linked to the Bureau's Strategic Framework through Strategic Objective 4.1, "Special Initiatives." USAID/Serbia's Strategic Plan was developed and approved in April and May 2000. At the present time, however, there is no specifically applicable results framework for FRY. The proposed activity will be completed in FY 2001.

3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

USAID funds will be provided by this program solely to finance some of the electricity imported into Serbia. The electricity purchased will come from one or more adjacent countries and likely from traditional suppliers. Electricity will be provided through existing electric grids. No new construction or rehabilitation of power lines or equipment is included. Imported electricity enters Serbia through high voltage transmission lines. While the source of this electricity cannot be pinpointed, a review of the electricity mix of neighboring countries indicates that the mix of sources is similar to Serbia's. After the electricity is received, the FRY government will send bills from the suppliers directly to USAID for payment. SESP program funds will then be paid directly by USAID to the suppliers. As the exact source of that electricity cannot be identified in advance, USAID knows of no negative environmental effects.

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project has reviewed the potential environmental impacts of the action summarized in the foregoing IEE. It has been determined that the proposed activity, as described, will not have a significant negative impact on the environment over the life of the activity. Therefore, no special mitigation measures are needed.

5.0 SUMMARY OF FINDINGS

Environmental Determination:

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project recommends a negative determination without conditions of significant environmental effect for the Serbia Electricity Supply program, and requests E&E Bureau Environmental approval of a negative threshold decision for this activity.

REVISIONS

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that this activity's effect on the environment might be "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer and if appropriate, an environmental assessment will be prepared.

ENVIRONMENTAL COMPLIANCE FACESHEET

Title of Activity/Activity Number: **EcoLinks Grants Program**
Country/Region: **Europe & Eurasia**
Funding Period: FY 1998 - FY 2003 Resource Levels/Amount(s) $23,297,897
Statement Prepared by: J.A. Atchue III, CEP, CHMM; January 17, 2001
Project Manager, EISN
IEE Amendment (Y/N)? Y **Date of Original IEE:** 7/98
Environmental Media and/or Human Health Potentially Impacted (check all that apply):
Air X *water X land X* *biodiversity* (specify)_____ *human health X* *other*____ *none*_____

Environmental Action(s) Recommended (check all that apply):

X 1. *Categorical Exclusion*(s)

X 2. Initial Environmental Examination:

____ *Negative Determination*: no significant adverse effects expected regarding the proposed activities, which are well defined over life of activity. IEE prepared:
____ without conditions (no special mitigation measures needed; normal good practices and engineering will be used)
____ with conditions (special mitigation measures specified to prevent unintended impact)

X *Negative Determination:* no significant adverse effects expected, but multiple sites and sub-activities are involved that are not yet fully defined or designed. "Umbrella IEE" prepared.
X conditions agreed to regarding an appropriate process of environmental capacity building and screening, mitigation and monitoring.

____ *Positive Determination*: IEE confirms potential for significant adverse effect of
____ EA to be / being / has been (circle one) conducted. Note that the activities affected cannot go forward until the EA is approved.

____ *Deferral:* one or more elements not yet sufficiently defined to perform environmental analysis; activities will not be implemented until amended IEE is approved. Briefly describe the nature of the deferred activities:_____

207

Summary of Findings:

The proposed actions to be undertaken under the Quick Response Award and Twinning Grant activities are entirely within the classes of action cited in Title 22 of the Code of Federal Regulations (CFR), Section 216.2, (Applicability of Procedures) paragraph (c)(2), [22CFR216.2 (c)(2)] and therefor are **categorically excluded**. Pursuant to 22 CFR216.2 (c)(2), the originator of the proposed actions has determined that these activities are fully within the following classes of action:

Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored [22 CFR216.2 (c)(2) (ii)].

Analyses, studies, academic or research workshops and meetings [22 CFR216.2 (c)(2) (iii)].

Document and information transfers [22 CFR216.2 (c)(2) (v)].

Pursuant to 22 CFR216.3 (a)(3)(iii), the originator of the proposed actions also recommends a **negative determination (with conditions)** of significant environmental effect for the Challenge Grant portion of the Program's activities. The originator requests that the E&E Bureau approve a negative threshold decision for those activities contingent on the use of the review, monitoring, and mitigation measures discussed in Section 4.

REVISIONS:
Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

USAID APPROVAL OF ENVIRONMENTAL ACTION(S) RECOMMENDED:
Clearance:

EE/EEST Office Director: _____ Date: 01/31/01

Concurrence:

Bureau Environmental Officer: Carl F. Maxwell Date: 01/31/2001

Approved: ✓

Disapproved: _____

Optional Clearances:

EcoLinks Grants Program Deputy Director Patricia Lai Date: 1/24/01
Patricia Lai, IIE

208

1.0 BACKGROUND AND ACTIVITY DESCRIPTION

This is an amendment to an earlier Initial Environmental Examination (IEE) and is written as an umbrella IEE. This type of IEE is needed in order to manage the numerous small grant activities that are funded under the EcoLinks Grants Program.

The EcoLinks Program was established in 1999 to help the United States (US) environmental industry capitalize on the nascent market potential in Europe and Eurasia. The EcoLinks Partnership Grants Program builds the capacity of businesses and local governments in 21 countries in the Europe & Eurasia (EE) Region to develop market-based solutions to environmental problems.

Competitively awarded, cost-shared grants are offered that facilitate cross-border partnerships. These partnerships link either EE with U.S. organizations or organizations within the EE region. The partners work together to implement a project activity supported by the EcoLinks grant, thereby strengthening the capacity of the local partner to address environmental problems.

EcoLinks Grants are administered by the Institute of International Education (IIE), under a five-year cooperative agreement (EE-A-00-98-00020-00) with USAID. IIE has awarded a subcontract to the Regional Environmental Center for Central and Eastern Europe (REC) to serve as its main partner and assist in administering partnership grant activities.

The 22 EcoLinks countries are the following:

United States	Latvia
Armenia	Lithuania
Bosnia and Herzegovina	Macedonia
Bulgaria	Moldova
Croatia	Poland
Czech Republic	Romania
Estonia	Russia Far East
Georgia	Slovakia
Hungary	Turkmenistan
Kazakhstan	Ukraine
Kyrgyzstan	Uzbekistan

There are three types of grants programs:

1. Challenge Grants ($5000 to $50,000) support one-year cooperative projects or activities that help build the capacity of businesses and local governments to solve specific environmental problems and needs. Approximately 40 are to be awarded each year of the agreement.

2. Quick-Response Awards (QRA) (up to $5,000) initiate contacts and support immediate needs, such as travel to meet prospective partners or attend technology demonstrations. Approximately 120 are to be awarded each year of the agreement.

3. Twinning Grants (up to $250,000) focus on supporting sustainable partnerships and institutional strengthening. Twinning Grants will be launched on a pilot basis in late 2000.

All of these activities are conducted under the environmental regulations of the various countries in which they take place. In addition, the vast majority of these activities are either training programs or pre-feasibility studies involving no actual impact on the environment. The expected and possible impacts are discussed below.

2.0 COUNTRY AND ENVIRONMENTAL INFORMATION

The area encompassed by the EcoLinks Partnership Grants Program encompasses 21 countries located in what USAID characterizes as the Europe and Eurasia (EE) Region. It encompasses nine time zones. While much of this area is in the Temperate Zone it also includes areas that are boreal and desert.

Many of the countries in the EE have a significant industrial base and the pollution problems associated with such a base. The countries in the EE range from being moderately to highly urbanized with high population densities with little original forest cover remaining; to being primarily agrarian with significant areas of relatively un-exploited lands.

These countries face a number of environmental issues. They include air and water pollution caused by aging industrial infrastructure, lack of environmental control, sampling, and analytical technologies, lack of environmental infrastructure for municipal water and wastewater systems, and problems with implementation of environmental regulations.

3.0 EVALUATION OF PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

As stated above, the vast majority of activities in the EcoLinks Grants Program focus on, capacity building, partnership facilitation, and training. As a result there is little expectation that the activities will have any sort of environmental impact.

3.1 Challenge Grants

Challenge Grants primarily support technical assistance, pre-feasibility assessments of environmental projects/investments, professional exchanges, training, publications and translation of operating manuals. Environmental equipment to a value of 20 percent of the grant can be purchased. A cost-sharing component of 25 percent of the ~~loan~~ grant value also is required.

A concept paper is submitted as the first step in the application process. Currently, it must address one of three topics- Water Quality Management, Cleaner Production, or Global Climate change. These papers initially are screened by Grants Program Staff. They also are forwarded to staff at the U.S. Commercial Service who review the paper and check on the financial viability of the applicant. The screening criteria for the conept papers includes:

- The activity fits under one or more of the grant topics
- The environmental problem of the Project Leader is clearly defined and the basis for the project concept
- The project activity complies with the legal requirements of the country
- The activity is completed within one year and is expected to yield measurable results at the end.
- The budget is within the limit.
- There is a competent English speaker in each partner organization
- If the Leader is a business, it must be legally registered. Companies are required to provide a company profile, including references.

210

- If the Leader is a municipality, it must be able to demonstrate the commitment and support of the supervisor of the activity.

After the concept paper has been approved a full-scale proposal is submitted. A committee of local and US environmental experts reviews the applications. Here too there are several criteria that are used to judge the application:

- The capacity of the Project Leader to implement the project is strengthened through a partnership that provides for the sharing of experience, expertise, information and/or technology.
- The project promotes market-based solutions to urban or industrial environmental problems. The project is both economically and environmentally sound. It also demonstrates an understanding of market incentives and their application.
- The project is clearly defined and relevant to the local situation.
- The goals and objectives are feasible, and the goals can be reached within the project scope.
- The implementation plan clearly defines the key activities that are required to achieve the objectives as well as the tasks, timelines and deliverables for each partner. The plan describes how the project will be managed and defines the roles of each partner.
- The members of the project team are capable of managing and completing the project, both financially and organizationally.
- The project generates tangible results by the end of the grant period. These results are verifiable, measurable and consistent with the expected outcomes.
- The project has a high potential to result in a best practice or model that can be replicated in another organization or country.
- The budget is complete, reasonable and cost-effective. It is clearly explained, proposing realistic and cost-effective solutions and spending limited funds in the most efficient manner.

There are a number of safeguards in place to ensure that the activity supported by the grant, as well as any follow-on activities, properly address environmental problems:

- A pre-screening criterion requires that the applicant comply with national legal requirements, particularly public participation and environmental regulations.
- The grants topics listed in the Request for Applications encourage a pollution prevention, cleaner production approach to problem solving.
- A selection criterion requiring that the project be both economically and environmentally sound also is in place.
- The applicant is required to identify success indicators by which the economic and environmental benefits are measured.
- An independent panel of environmental experts reviews the applications. They approve only applications that solve environmental problems without any further damage to the environment.
- Activities that are awarded grants will go through an environmental screening process.

The purpose of Challenge Grants is to help solve urban and industrial environmental problems through sound environmental practices. The physical and topographic conditions, climate, soils, and ecosystems as well as social and economic characteristics that could be encountered are quite variable. Because the specific characteristics and locations of these activities have not yet been defined, the potential for adverse environmental impacts cannot be excluded until additional information about project design and location becomes available. Each, therefore, requires environmentally sound design and environmental review to determine the specific nature and magnitude of potential impacts.

The entire selection process is focused on identifying the highest quality grants that have the largest potential to succeed in an environmentally sustainable manner. Activities associated with Challenge Grants also share the common characteristic of being small in scale. Challenge Grants have very low potential for negative environmental impact.

A winner's meeting for all project partners is organized in the home country to sign the grant agreements; to meet other winners and learn about their projects; and to meet the EcoLinks Grants Officer assigned to the project who will explain the reporting requirements and procedures for funds disbursements.

The projects are monitored by IIE, and grant funds are disbursed in installments. The grantees are required to submit a mid-term progress report and a final report. Both reports contain a narrative performance report, an expense report and discussion of the implementation of any mitigation activities that were required. The local Grants Program Officer will monitor any mitigation activities required as part of the grant.

3.2 Quick Response Awards

Quick Response Awards support partnership facilitation. The awards are intended to support travel so representatives of different organizations can explore a potential partnership within the framework of the EcoLinks program. Sometimes the partners might even start to prepare their Challenge Grant application. The maximum value of these awards is $5,000. This activity takes place over a very short period of time. No negative environmental impact is expected to be associated with QRAs.

3.3 Twinning Grants

Twinning Grants support partnership building, replicate and disseminate best practices, and strengthening of institutions. They are intended to last for a two-year period and have a maximum value of $250,000. Examples of funded activities are:

- Addressing policy barriers to market-based solutions to environmental problems.
- Developing certification programs, such as ISO 14001.
- Providing training on how to prepare financial packages for environmental projects.

The activity team for these grants will consist of a Team Leader, a Principal Partner and an optional Secondary Partner. (Optional Secondary Partners are organizations that can offer additional assistance to the project (such as Northern Tier countries) or that can also benefit from the project activity.) T he Team Leader is a US organization that organizes the project team, submits the application, manages the project, and submits all financial and performance reports. It has an existing relationship with the Principal Partner, and it is expected to strengthen the capacity of the Principal Partner to address environmental issues.

The Principal Partner, is located in the Region where the project activity is undertaken. This group is an active project participant and is committed to the defined project objectives. Both the Team Leader and the Principal Partner receive grant funds directly from the EcoLinks Grants Program.

A winner's meeting for all project partners is organized in the United States. Its purpose is, to sign the grant agreements; meet other winners and learn about their projects; and meet the EcoLinks grants officer assigned to the project who will explain the reporting requirements and procedures (including any required environmental monitoring or mitigation) for funds disbursements.

The projects are monitored by IIE staff, and grant funds are disbursed in multiple installments. The grantees are required to submit quarterly progress reports and a final report. Both reports contain a narrative performance report, environmental review, and an expense report. Each grantee reports against milestones stated in the work plan to ensure that project results are achieved.

Because of the types of activities that they support, no negative environmental impacts are expected to be associated with Twinning Grants.

4.0 RECOMMENDED MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

4.1 Environmental Screening and Review

The environmental screening procedures are intended to result in environmental accountability and soundness, by requiring that the International Institute for Education (IIE) put in place specific mechanisms to promote environmental review. These procedures are based on use of a Screening Form, presented in Attachment 1. Activities judged to meet Category 3 or 4 as described in the attachment will not be awarded grants.

All awarded Challenge Grants will be individually screened using the attached Screening Form, (Attachment 1). IIE will use the form to categorize the level of environmental concern for each of the grant activities. Activities found to meet the form's category 1 criteria will be approved with no further environmental requirements. An Environmental Review Report shall be prepared for all Category 2 activities. The Bureau Environmental Officer (BEO) on behalf of USAID/EE shall be responsible for clearances on the category determination and Environmental Review Reports. Prior to the approval of an activity, results of the environmental categorization must be available and considered.

For Category 2 projects, Environmental Review Reports, including BEO review must be completed prior to funding. No Category 3 or 4 activities will be approved. All awards will contain clauses stating that funding of Category 2, activities is contingent on findings, recommendations and clearance of the environmental documentation.

Copies of each screening form and (signed) Environmental Review Report will be kept in the grant file materials as part of the grantee's application.

IIE's annual report to USAID/EE shall contain a section on environmental impacts, success or failure of mitigative measures being implemented, results of environmental monitoring, and any major modifications/revisions to the project, mitigative measures or monitoring procedures. A table indicating the title, date of award, and category of each grant activity will be provided as an annex of the annual report.

4.2 Environmental Responsibilities

IIE is responsible for completing the environmental report forms and the BEO will approve the reviews for all USAID-assisted activities associated with the EcoLinks Grants Program. IIE and the grantees will ensure implementation of agreed-on mitigating measures and environmental impact monitoring. IIE will monitor the environmental impacts of all project-financed activities, as further specified in the next section.

4.3 Monitoring, Evaluation, and Mitigation

An environmental monitoring, evaluation, and mitigation process will be established and used in accordance with the Environmental Review Report format in Attachment 1. USAID-supported activities shall incorporate appropriate mitigation and monitoring procedures as listed below.

IIE will use the *Environmental Screening Report For EcoLinks Grants Program Activities* to assist them in determining what potential impacts should be of concern for different types of development activities in various settings. Using the information from this and other documents cited therein, IIE staff will determine which impacts to mitigate and monitor for the particular development activity.

5.0 SUMMARY OF FINDINGS

The proposed actions to be undertaken under the Quick Response Award and Twinning Grant activities are entirely within the classes of action cited in Title 22 of the Code of Federal Regulations (CFR), Section 216.2, (Applicability of Procedures) paragraph (c)(2), [22CFR216.2 (c)(2)] and therefor are **categorically excluded**. Pursuant to 22 CFR216.2 (c)(2), the originator of the proposed actions has determined that these activities are fully within the following classes of action:

Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored [22 CFR216.2 (c)(2) (ii)].

Analyses, studies, academic or research workshops and meetings [22 CFR216.2 (c)(2) (iii)].

Document and information transfers [22 CFR216.2 (c)(2) (v)].

Pursuant to 22 CFR216.3 (a)(3)(iii), the originator of the proposed actions also recommends a **negative determination (with conditions)** of significant environmental effect for the Challenge Grant portion of the Program's activities. The originator requests that the E&E Bureau approve a negative threshold decision for those activities contingent on the use of the review, monitoring, and mitigation measures discussed in Section 4.

REVISIONS:

Pursuant to 22CFR216.3 (a)(9), if new information becomes available which indicates that activities to be funded by the Project might be "major" and the Project's effect "significant," this negative determination will be reviewed and revised by the E&E Bureau Environmental Officer and, if appropriate, an environmental assessment will be prepared.

Attachment 1

ENVIRONMENTAL SCREENING REPORT FORM

FOR ECOLINKS GRANTS PROGRAM ACTIVITIES

ENVIRONMENTAL SCREENING FORM
FOR ECOLINKS GRANTS PROGRAM ACTIVITIES

Name of Grantee:

Other Implementing Partner(s)[if Appropriate]:

Grant Title:

Duration (proposed start and completion dates):

Geographic Location:

Activity Description (paragraph(s) describing purpose/outputs and potential environmental impacts):

Determine the Nature of the Activity

a. **No Further Environmental Review Required.** Does the activity exclusively provide technical assistance, training, institutional strengthening, or research, education, studies or other information analysis, awareness-building or dissemination activities *with no foreseeable negative impact on the biophysical environment*? This probably qualifies as a Category 1 activity—no further environmental review or action may be necessary. Complete form to establish this circumstance.

b. **Environmental Review Report Needed.** Does the activity include funds to support any physical natural resource management activities (e.g., land clearing, irrigation), or any community and rural development services (e.g., agroforestry, tree-planting), infrastructure (e.g., dams or water catchments), public facilities (e.g., water and sanitation systems), road construction or rehabilitation? Does it involve development of income-generating or resource management systems? It will likely require an Environmental Review of the kind described in Step 4 of this form. Determine which Category the activity falls under, to establish the need for the Environmental Review.

c. **Multiple Categories.** Some grant activities will have components in more than one category. Simply mark all that apply. The form will guide you to the appropriate next steps.

216

Step 1. Determine Category of Activity.

Category 1 -- **No further environmental review needed:**

☐ *Does the activity involve (mark yes, if applicable)*:

___ Provision of education, technical assistance, or training. Does *not* qualify for "Category 1" if such programs include activities which may have a negative on the environment such as discharge of wastes to surface or groundwater, treatment of hazardous, toxic, solid, liquid, or gaseous wastes.
___ Community awareness initiatives.
___ Controlled experimentation exclusively for the purpose of research and field evaluation confined to small areas (normally under 4 ha., i.e., 10 acres) and carefully monitored (when no protected or other sensitive environmental areas could be affected).
___ Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.
___ Document or information transfers.
___ Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices (when no protected or other sensitive environmental areas could be affected). *Note that USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.*
___ Construction or repair of facilities if total surface area to be disturbed is under 10,000 sq. ft. (approx. 1,000 sq. m.) (*and* when *no* protected or other sensitive environmental areas could be affected).
___ Support for intermediate credit arrangements (when *no* significant biophysical environmental impact can reasonably be expected).

Category 2 -- **Negative environmental impacts possible, environmental review required (specific conditions, including monitoring, may be applied):**

Note: The Environmental Review must address why there will be no potential adverse impacts on protected areas, endangered or threatened species or their critical habitat; or relatively undegraded forest, i.e., justify your conclusion that the proposed Category 2 activities do not belong in Category 3 or 4. (See Step 4 starting on page 4 for a discussion.) Even for activities designed to protect or restore natural resources, the potential for environmental harm exists (e.g., re-introduction of species, controlled burning, fencing, wildlife water points, spontaneous human population shifts in response to activities undertaken, etc.). *If you do not find an exact match listed here for the activity you are undertaking, and it is not in Category 1, 3 or 4, then use the last item in Category 2 to describe the activity and treat it as Category 2 for purposes of environmental review.*

☐ *Does the activity involve (mark yes, if applicable)*:

___ Controlled experimentation exclusively for the purpose of research and field evaluation *(areas of 4 ha. or more,* i.e., 10 acres) and carefully monitored, when protected or other sensitive environmental areas could be adversely affected or threatened and endangered species and their habitat jeopardized.
___ Small-scale construction or rehabilitation of facilities or structures in which the surface area to be disturbed exceeds 10,000 sq. ft and funding level is not in excess of $200,000 and where no protected or other sensitive environmental areas could be affected.
___ The discharge of treated (or untreated) waste to the soil, air, surface water or groundwater.
___ The construction of waste treatment facilities. These facilities would include, land farms, landfills, lagoons, incinerators (or other types of thermal treatment), facilities to treat oil and oily wastes, facilities to treat any type of waste generated as a result of industrial activities, and municipal wastewater treatment facilities. (The definitions of waste must be that of the regulations of the country in which the work is being done. If there is no regulatory definition, the grantee must use

either the definition available from the European Union or that used by the United States Environmental Protection Agency.)

___ Support for intermediate credit institutions when indirect environmental harm conceivably could result.

___ Technical studies and analyses and other information generation activities that could involve intrusive sampling not covered above.

___ Other activities not in Category 1 and not in Category 3 or 4.
Specify:_____

☐ ***Were the following used by the Grantee in designing the above Category 2 activities (mark yes, if applicable)?***

___Any applicable Programmatic Environmental Assessments:
_____

Other(s):_____
_____

Category 3 **-- Significant environmental impacts likely. Environmental review required, and Environmental Assessment likely to be required:**

☐ ***Does the activity involve (mark yes, if applicable):***

___ River basin or new lands development
___ Planned resettlement of human populations
___ Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas
___ Substantial piped water supply and sewerage construction
___ Major bore hole or water point construction
___ Large-scale irrigation
___ Water management structures such as dams and impoundments
___ Drainage of wetlands or other permanently flooded areas
___ Large-scale agricultural mechanization
___ Agricultural land leveling
___ Procurement or use of restricted use pesticides, or wide-area application in non-emergency conditions under non-supervised conditions
___ Light industrial plant production or processing (sawmill operation, agro-industrial processing of forestry products)
___ Potential to significantly degrade protected areas, such as introduction of exotic plants or animals
___ Potential to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests).
___ Use of pesticides.

The above Category 3 activities are consistent with USAID criteria for activities that normally require a USAID-specific document with a defined format and procedure, called the Environmental Assessment (EA). It is recognized that some of these categories are ambiguous. Mark "yes" if they apply, and show in the Environmental Review (Step 4) the extent and magnitude of activities and their impacts, so that USAID and its partners can determine if an EA is necessary or not.

Category 4 **-- Activities not fundable or fundable only when specifically defined findings to**

avoid or mitigate the impacts are made, based on an Environmental Assessment[1]:

☐ ***Does the activity*** **involve (yes, no, N/A):**

___ Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals
___ Actions determined likely to jeopardize threatened & endangered species or adversely modify their habitat (esp. wetlands, tropical forests)[2]
___ Conversion of forest lands to rearing of livestock
___ Planned colonization of forest lands
___ Procurement or use of timber harvesting equipment
___ Commercial extraction of timber
___ Construction of dams or other water control structures which flood relatively undegraded forest lands
___ Construction, upgrading or maintenance of roads (including temporary haul roads for logging or other extractive industries) which pass through relatively undegraded forest lands.

Step 2. Summarize and Itemize Activities. List activities by all categories to which *Yes* was answered.

Category of activities as determined below (add entries as required):

Activity/Sub-Activity	Funding:	Category

Step 3. Determine Need to Prepare Environmental Review.

If all activities are in Category 1, sign and date the form. For activities in Category 2, prepare an Environmental Review Report assessing all of these activities' impacts. Category 3 and 4 activities may not be carried out under the grant program and cannot be included under its activities. For all Category 2 activities, proceed to Step 4 to prepare Environmental Review.

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1 **Per Foreign Assistance Act Sect. 118 & 119 relating to overseas assistance affecting Tropical Forestry and Biodiversity.**

2 **Per USAID Environmental Procedures, §22 CFR 216.5, on Endangered Species**

Step 4. Prepare Environmental Review.

Suggested Format for Environmental Review

The Environmental Review should be about 3-5 pages long (more if required) and consist of following sections:

1. **Background, Rationale and Outputs/Results Expected** -- summarize and cross-reference proposal if this review is contained therein.
2. **Activity Description** -- Succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during grant activities. Special attention should be paid to any activities that will involve construction of any sort or the treatment and disposal of any liquid, gaseous, solid, toxic, or hazardous waste. If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.
3. **Environmental Situation** -- Affected environment, including essential baseline information available for all affected locations and sites, both primary and ancillary activities.
4. **Evaluation of Activities and Issues with Respect to Environmental Impact Potential** -- Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with restoring or reusing the site, if the facility or activity were completed or ceased to exist. Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.) Indicate positive impacts.
5. **Environmental Mitigation Actions** (including **monitoring** and **evaluation**) -- For example, indicate means taken to avoid, reduce or compensate for impacts, such as the restoration of remediation sites, the discharge of treated (or untreated) waste to the soil, air, surface water or groundwater, and the construction of waste treatment facilities. Indicate how mitigation measures will be monitored to ensure that they accomplish their intended result. Include discussion of what monitoring might be needed for impacts that one is uncertain about.
6. **Other Information** (as appropriate) -- where possible, include photos of the site and surroundings; list the names of any reference materials or individuals consulted.

Note: Specific plans for monitoring of key environmental indicators and mitigation of impacts during activity implementation are especially important; these must be addressed in the review. Information on monitoring results and mitigation of impacts are to be included in all progress reports. Important information and a criterion for evaluation of environmental soundness is showing how the activity is part of or guided by an integrated, community-based resource and land use plan or planning and management framework that considers the appropriate use of multiple resources.

Drafted by (Grantee and/or IIE Program Officer): _____ Date:

Reviewed by (IIE Deputy Director): _____ Date:

Clearances for Category 2 Activities:

BEO

Approved _____ Date:

Disapproved_____ Date:

220

SELECTED GUIDELINES/ REFERENCES

1. Judge John. J. Sirica's Letter & Civil Action 75-0500, Environmental Defense Fund Vs USAID
2. Executive Order 12114-Enviornmental Effects Abroad of Major Federal Actions
3. E/mail on grant to UNDP-typical examples of significant impacts
4. Pesticides
5. For Multisectoral Guidelines and Pesticides that are restricted, cancelled or Suspended by USEPA (Consult Technical Paper No 18 (Environmental Guidelines for Small-Scale Activities in Africa), Appendix E-2, p. 184-This document may be downloaded from http://www.usaid.gov/sdpsge/pubs/18ngo.pdf)
6. Wetlands
7. Safe management of waste from health-care activities
8. PEA, Moldova-Outline
9. Environmental Monitoring during construction of Brcko Railway Bridge-Bosnia-Herzegovina
10. Environmental Assessment Checklist for Olovo Health Center-Bosnia-Herzegovina
11. Environmental Baseline Survey on Pre-construction and Post-construction conditions at Grbavica School, Bosnia-Herzegovina
12. Mitigation-Macedonia, Stanica Zelenikovo Sewer System Project under EAPS

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

LATIF

ENVIRONMENTAL DEFENSE FUND, INC., et al., Plaintiffs,	)	
v.	)	Civil Action No. 75-0500
UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, et al., Defendants.	)	

FILED
DEC 5 1975
JAMES F. DAVEY, Clerk

ORDER

This court has carefully considered the stipulation executed by the parties to this case. The court has concluded that the stipulation establishes a fair and equitable method of procedure in this action that it resolves in a fair and equitable manner some of the issues raised, and that approval of the stipulation would serve the public interest.

NOW THEREFORE, it is ordered that the attached stipulation is approved.

John J. Sirica
John J. Sirica
United States District Judge
for the District of Columbia

DATED: 12/5/75

United States District Court
for the District of Columbia
A TRUE COPY
JAMES F. DAVEY, CLERK
By James P. Capitano
Deputy Clerk

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222

FOR THE DISTRICT OF COLUMBIA

ENVIRONMENTAL DEFENSE FUND, INC. et al., Plaintiffs,	)	
v.	)	Civil Action No. 75-0500
UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, et al., Defendants.	)	

FILED DEC 5 1975 JAMES F. DAVEY CLERK

S T I P U L A T I O N

The parties to this action, by and through their respective undersigned counsel, hereby stipulate and agree, subject to the approval of the Court, as follows:

1. The United States Agency for International Development ("AID") will prepare, circulate, make available to the public, and consider in its decisionmaking process, in accordance with the schedule and procedures set forth below and pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969, Pub. L. No. 91-190, 83 Stat. 852, 42 U.S.C. §§4321 et seq. ("NEPA"); Executive Order 11514, 3 C.F.R. 271 (Supp. 1974); and the guidelines of the President's Council on Environmental Quality, 40 C.F.R., Part 1500 (the "CEQ guidelines") a detailed environmental impact statement (the "EIS") on its pest management program including its pesticide activities The pest management program, as used herein, means all activities conducted, supported, financed, and/or otherwise assisted by AID intended to control or eliminate pests. Pesticide activities as used herein, means all activities conducted, supported, financed, and/or otherwise assisted by AID for the procurement or use of pesticides. Pesticides, as used herein, mean substances or mixtures of substances, (a) intended for prevention, destroying, repelling, or mitigating any unwanted insects, rodent nematodes, fungi, weeds and other forms of plant or animal life or viruses, bacteria or other micro-organisms (except viruses,

NEPA 1969

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bacteria or other micro-organisms on or living in man or other living animals), or (b) intended for use as plant regulator, defoliant or desiccant.

2. AID may utilize a contractor and outside consultants or experts as well as other federal agencies, international organizations and representatives of foreign governments to assist in the preparation of the EIS, consistent with Section 1500.7(c) of the CEQ guidelines, and provided that, to the extent consistent with applicable laws and regulations, plaintiffs will be given the opportunity to identify and submit views to AID about any prospective contractors, consultants, or experts. Preparation of the EIS will be done in consultation with the Environmental Protection Agency (the "EPA").

3. Within 15 days of the approval of this stipulation by the Court, AID will publish in the Federal Register a notice of the intent to prepare the EIS. The notice will describe the pest management program, including the pesticide activities, in general terms, state the general scope of the EIS together with the anticipated schedule for preparation, and solicit comments and information from interested parties.

4. The EIS will be issued, circulated for comment to other federal agencies, and made available for comment to the public, the World Health Organization, the Food and Agricultural Organization, and foreign governments that are receiving or are eligible to receive AID assistance for the procurement and use of pesticides and desire to receive a copy, in draft form by ~~August 31~~ Sept 30, 1976. This date may be changed by agreement of the parties or by the Court upon good cause shown. Public and other comments on the draft EIS will be accepted within 60 days of the issuance of the draft. The EIS will be issued in final form within 45 days of the close of the comment period.

60 days

5. The EIS will contain, inter alia, the following, to the maximum extent practicable:

a. Historical description of the pest management program, including the pesticide activities.

b. Description of the scope and nature of current and reasonable anticipated pest management program, including pesticide activities, regulations, guidelines, policies and practices relating thereto; an individual description of any pesticides included in such activities for which the registration for use in the United States has been finally suspended or cancelled by the EPA and for 2, 4, 5-T, Chlordane, Heptachlor, and such descriptions by functional or chemical groups of all other pesticides included in such activities; and a statement with respect to each pesticide included in the pesticide activities of the amounts used, by geographic area and purpose.

c. Assessment of environmental impacts, including adverse environmental impacts which cannot be avoided, of the current and reasonably anticipated pest management program, including the pesticide activities, wherever such impacts or activities occur, subdivided by areas of activity, i.e., food production and preservation, public health programs, non-food crops, etc., including:

(i) effects on humans using the pesticides or living near the locale where the pesticides are used, or elsewhere;

(ii) effects on flora and fauna, including fish and wildlife;

(iii) effects on pesticide residues in food, with a focus on international and national residue tolerances;

(iv) effects caused because of the mobility of pesticides as they may be carried to other areas by water, air, or otherwise; and

(v) effects caused by the cumulative impact of the pesticides, to the extent data or analyses are available on such cumulative impacts.

d. Analysis of reasonable alternatives and their environmental effects, including, but not limited to:

(1) Terminating or temporarily suspending all or part of the pest management program, including pesticide activities;

(2) Providing assistance for forms of pest management other than the use of pesticides; and

(3) Requiring user compliance with standards, either those promulgated by the EPA for use of pesticides in the United States (including cancellations, suspensions, restricted uses, and label restrictions) or some other standards.

e. Conclusions as to which pesticides AID will not and which pesticides AID will provide assistance for, and, in detail, the limiting factors applicable to those pesticides for which AID will provide assistance including, but not limited to, conditions relating to use, climate, flora, fauna, or geography of areas where each pesticide may be used, handling and packaging and those efforts which will be undertaken, where possible, to obtain the agreement of host countries and/or international and regional organizations, for the establishment of such data-gathering mechanisms as might be necessary and appropriate to monitor or prevent potential adverse environmental impact associated with pesticide activities collectively and individually.

6. As soon as possible after the final EIS is filed, AID will publish regulations implementing the conclusions referred to in paragraph 5. The regulations will provide that, when assistance for the procurement and use of pesticides is sought, AID will determine, in writing, whether the specific pesticide, use, climatic, geographic or other relevant condition or factor has been analyzed in the EIS and is provided

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for in the regulations. If they have not been analyzed and provided for in the regulations, AID will not provide assistance without initially assessing the impact of the pesticide, and if such assessment reveals potential significant environmental impact, AID will not provide assistance without the preparation, circulation for comment, release to the public, and consideration in its decisionmaking process, of a further environmental impact statement or an amendment to the EIS. Notwithstanding the above, AID may provide assistance before such assessment or environmental impact statement is completed (a) if the AID Administrator personally determines that an emergency, as defined in paragraph 7, exists and that the time available from discovery or prediction of the pest outbreak is insufficient for the preparation of the assessment or statement and (b) for controlled experimentation of limited scope, and not involving application for crop production purposes. In instances where capital or technical assistance is sought and where specific uses of such assistance are not identified, AID will condition the provision of such assistance on compliance with AID's regulations. Written copies of all determinations and assessments referred to above will be made available, on request, to any interested member of the public.

7. (a) Until the regulations referred to in paragraph 6, above, are effective, AID will not provide assistance for the procurement and use of --

(1) dichlorodiphenyl trichloroenthane (DDT) (except for public health use)

(2) Aldrin and Dieldrin (except for restricted termite use, the dipping of roots and tops of non-food plants)

(3) 2, 4, 5-T

(4) Chlordane

(5) Heptachlor

and will not provide assistance for a pesticide which is not registered, for a use which is not registered, for a pesticide or a use which has been finally suspended, or for a use or pest-

60 days from such notice, except that such assistance may be provided if the Administrator personally determines, in writing, that the benefits of using the pesticide outweigh the potential adverse effects and that no preferable alternative is available. The above prohibitions do not apply to assistance for pesticides if the responsible AID employee determines, in writing, that the pesticide will be used for health purposes and that significant health problems will occur without the use of the pesticide. Further, AID may provide assistance for the use of any pesticide referred to above if the AID Administrator personally determines, in writing, in each specific instance, that an emergency exists. An emergency will be determined to exist when a pest outbreak has or is about to occur and no pesticide registered for the particular use, or alternative method of control is available to eradicate or control the pest, and when significant economic problems will occur without the use of the pesticides. Further, notwithstanding the above, AID may provide assistance for the procurement and use of a pesticide if the pesticide is not registered in the United States or if the pesticide has been cancelled at the end of a five-year registration period or at the request of a registrant and if the pesticide will be used on agricultural crops and associated vectors not grown or found in the United States, and if the AID Administrator personally determines, in writing, that the benefits of using the pesticide outweigh the potential adverse effects and that no preferable alternative is available.

(b) Any determination by the AID Administrator mentioned in subparagraph (a), above, will be made in consultation with the EPA, will include a statement of the basis for the determination, and will be published in the Federal Register within 10 days of the time the determination is made. AID will, unless time constraints do not permit, provide public notice that the Administrator intends to render such a determination.

(c) Within 30 days of the approval of this Stipulation by the Court, AID will issue and publish in the Federal Register a regulation or other directive implementing this paragraph.

8. AID recognizes its responsibilities to conduct its operations in a manner that mitigates or avoids any potential short- or long-term deleterious environmental effects of local, regional or global proportions. AID will ensure that the environmental consequences of proposed AID-financed activities are identified and properly analyzed. AID will assist, to the extent possible, in strengthening the indigenous capabilities of developing countries to appreciate and evaluate the potential environmental effects of proposed development strategies and projects and to select, implement and manage effective environmental protection measures.

9. AID will propose, solicit and consider public comments on, and adopt environmental regulations, to assist AID in implementing the requirements of NEPA, such NEPA regulations to be adopted in consultation with the CEQ.

10. The following schedule will apply to the regulations referred to in paragraph 9 above:

a. Draft regulations published for comment in the Federal Register by February 29, 1976.

b. Public comment accepted for a period of approximately 60 days.

c. Final regulations published in the Federal Register 30 days after the close of the comment period.

The above dates can be altered by agreement of the parties or by the Court upon good cause shown.

11. The environmental regulations, referred to in paragraph 9 above, will cover all aspects of AID's activities (capital assistance, technical assistance, commodity assistance

a. AID will assess every proposed new activity at the earliest possible stage, including those that may arise in connection with ongoing projects, to identify whether the activity is a major action significantly affecting the environment.

b. AID will prepare a detailed environmental impact statement in accordance with Section 102(2)(C) of NEPA, the CEQ guidelines, and AID regulations on any aspect of AID's activities (capital assistance, technical assistance, commodity assistance, etc.) covered by NEPA in each instance where such a statement is required. Where the proposed action will not require an impact statement, AID will, nevertheless, assess the potential environmental effects and the results of that assessment will be an integral part of its decision-making process.

c. AID will prepare supplements to previously prepared assessments or impact statements to cover significant new information which may become available or to cover significant modifications of programs or activities which were previously studied in an assessment or environmental impact statement.

d. When an AID activity is undertaken with the understanding that further identifiable, related activites are intended to be undertaken of substantially the same nature, promoted and financed by AID or another U.S. government agency, or where AID assistance is conditioned upon the recipient country's undertaking further related activities of substantially the same nature, AID will identify the further activities in an AID project paper and will consider the cumulative impact of its activity and of the further activities when preparing assessments and in deciding whether to prepare an environmental impact statement and, if an environmental impact

230

12. Upon the approval by the Court of this Stipulation, the attached Order shall be entered herein.

Respectfully submitted,

RICHARD A. FRANK

ELDON V. C. GREENBERG

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IRWIN SCHROEDER

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U.S. Department of Justice
Washington, D. C. 20530
(202) 739-2710

Attorney for Defendants

Dated: December 1, 1975
Washington, D. C.

LATIF

EXECUTIVE ORDER 12114

ENVIRONMENTAL EFFECTS ABROAD OF MAJOR FEDERAL ACTIONS

HISTORY: Jan. 4, 1979; 44 FR 1957, 3 CFR, 1979 Comp., p. 356

By virtue of the authority vested in me by the Constitution and the laws of the United States, and as President of the United States, in order to further environmental objectives consistent with the foreign policy and national security policy of the United States, it is ordered as follows:

Section 1

Section 11-1. Purpose and Scope.

The purpose of this Executive Order is to enable responsible officials of Federal agencies having ultimate responsibility for authorizing and approving actions encompassed by this Order to be informed of pertinent environmental considerations and to take such considerations into account, with other pertinent considerations of national policy in making decisions regarding such actions. While based on independent authority, this Order furthers the purpose of the National Environmental Policy Act and the Marine Protection Research and Sanctuaries Act and the Deepwater Port Act consistent with the foreign policy and national security policy of the United States and represents the United States government's exclusive and complete determination of the procedural and other actions to be taken by Federal agencies to further the purpose of the National Environmental Policy Act, with respect to the environment outside the United States, its territories and possessions.

Sec. 2

2-1. Agency Procedures.

Every Federal agency taking major Federal actions encompassed hereby and not exempted herefrom having significant effects on the environment outside the geographical borders of the United States and its territories and possessions shall within eight months after the effective date of this Order have in effect procedures to implement this Order. Agencies shall consult with the Department of State and the Council on Environmental Quality concerning such procedures prior to placing them in effect.

2-2. Information Exchange.

To assist in effectuating the foregoing purpose, the Department of State and the Council on Environmental Quality in collaboration with other interested Federal agencies and other nations shall conduct a program for exchange on a continuing basis of information concerning the environment. The objectives of this program shall be to provide information for use by

decisionmakers, to heighten awareness of and interest in environmental concerns and, as appropriate, to facilitate environmental cooperation with foreign nations.

2-3 Actions Included.

Agencies in their procedures under Section 2-1 shall establish procedures by which their officers having ultimate responsibility for authorizing and approving actions in one of the following categories encompassed by this Order, take into consideration in making decisions concerning such actions, a document described in Section 2-4(a):

(a) major Federal actions significantly affecting the environment of the global commons outside the jurisdiction of any nation (e.g., the oceans or Antarctica;)

(b) major Federal actions significantly affecting the environment of a foreign nation not participating with the United States and not otherwise involved in the action;

(c) major Federal actions significantly affecting the environment of a foreign nation which provide to that nation:

(1) a product or physical project producing a principal product or an emission or effluent which is prohibited or strictly regulated by Federal law in the United States because its toxic effects on the environment create a serious public health risk; or

(2) a physical project which in the United States is prohibited or strictly regulated by Federal law to protect the environment against radioactive substances.

(d) major Federal actions outside the United States, its territories and possessions which significantly affect natural or ecological resources of global importance designated for protection under this subsection by the President, or, in the case of such a resource protected by international agreements binding on the United States by the Secretary of State. Recommendations to the President under this subsection shall be accompanied by the views of the Council of Environmental Quality and the Secretary of State.

2-4 Applicable Procedures.

(a) There are the following types of documents to be used in connection with actions described in Section 2-3;

(i) environmental impact statements (including generic program and specific statements);

(ii) bilateral or multilateral environmental studies, relevant or related to the proposed action, by the United States

and one more foreign nations, or by an international body or organization in which the United States is a member or participant; or

(iii) concise reviews of the environmental, issues involved, including environmental assessments, summary environmental analyses or other appropriate documents.

(b) Agencies shall in their procedures provide for preparation of documents described in Section 2-4(a), with respect to actions described in Section 2-3 as follows:

(i) for effects described in Section 2-3(a), an environmental impact statement described in Section 2-4(a)(1).

(ii) for effects described in Section 2-3(b), a document described in Section 2-4(a)(ii) or (iii), as determined by the agency;

(iii) for effects described in Section 2-3(c), a document described in Section 2-4(a)(ii) or (iii), as determined by the agency;

(iv) for effects described in Section 2-3(d), a document described in Section 2-4(a)(i), (ii) or (iii), as determined by the agency. Such procedures may provide that an agency need not prepare a new document when a document described in Section 2-4(a) already exists.

(c) Nothing in this Order shall serve to invalidate any existing regulations of any agency which have been adopted pursuant to court order or pursuant to judicial settlement of any case or to prevent any agency from providing in its procedures for measures in addition to those provided for herein to further the purpose of the National Environmental Policy Act and other environmental laws, including the Marine Protection Research and Sanctuaries Act and the Deepwater Port Act, consistent with the foreign and national security policies of the United States.

(d) Except as provided in Section 2-5(b), agencies taking action encompassed by this Order shall, as soon as feasible, inform other Federal agencies with relevant expertise of the availability of environmental documents prepared under this Order.

Agencies in their procedures under Section 2-1 shall make appropriate provision for determining when an affected nation shall be informed in accordance with Section 3-2 of this Order of the availability of environmental documents prepared pursuant to those procedures.

In order to avoid duplication of resources, agencies in their procedures shall provide for appropriate utilization of the resources of other Federal agencies with relevant environmental

jurisdiction or expertise.

2-5 Exemptions and Considerations.

(a) Notwithstanding Section 2-3, the following actions are exempt from this Order;

(i) actions not having a significant effect on the environment outside the United States as determined by the agency;

(ii) actions taken by the President;

(iii) actions taken by or pursuant to the direction of the President or Cabinet officer when the national security or interest is involved or when the action occurs in the course of an armed conflict;

(iv) intelligence activities and arms transfers;

(v) export licenses or permits or export approvals, and actions relating to nuclear activities except actions providing to a foreign nation a nuclear production or utilization facility as defined in the Atomic Energy Act of 1954, as amended, or a nuclear waste management facility;

(vi) votes and other actions in international conferences and organizations;

(vii) disaster and emergency relief action.

(b) Agency procedures under Section 2-1 implementing Section 2-4 may provide for appropriate modifications in the contents, timing and availability of documents to other affected Federal agencies and affected nations, where necessary to:

(i) enable the agency to decide and act promptly as and when required:

(ii) avoid adverse impacts on foreign relations or infringement in fact or appearance of other nations, sovereign responsibilities, or

(iii) ensure appropriate reflection of:

(1) diplomatic factors;

(2) international commercial, competitive and export promotion factors;

(3) needs for governmental or commercial confidentiality;

(4) national security considerations;

(5) difficulties of obtaining information and agency ability to analyze meaning-fully environmental effects of a proposed action; and

(6) the degree to which the agency is involved in or able to affect a decision to be made.

(c) Agency procedure under Section 2-1 may provide for categorical exclusions and for such exemptions in addition to those specified in subsection (a) of this Section as may be necessary to meet emergency circumstances, situations involving exceptional foreign policy and national security sensitivity and other such special circumstances. In utilizing such additional exemptions agencies shall, as soon as feasible, consult with the Department of State and the Council on Environmental Quality.

(d) The provisions of Section 2-5 do not apply to actions described in Section 2-3(a) unless permitted by law.

Sec. 3.

3-1. Rights of Action.

This Order is solely for the purpose of establishing internal procedures for Federal agencies to consider the significant effects of their actions on the environment outside the United States, its territories and possessions, and nothing in this Order shall be construed to create a cause of action.

3-2. Foreign Relations.

The Department of State shall coordinate all communications by agencies with foreign governments concerning environmental agreements and other arrangements in implementation of this Order.

3-3. Multi-Agency Actions.

Where more than one Federal agency is involved in an action or program, a lead agency, as determined by the agencies involved, shall have responsibility for implementation of this Order.

3-4. Certain Terms.

For purposes of this Order, "environment" means the natural and physical environment and excludes social, economic and other environments; and an action significantly affects the environment if it does significant harm to the environment even though on balance the agency believes the action to be beneficial to the environment. The term "export approvals" in Section 2-5(a)(v) does not mean or include direct loans to finance exports.

3-5. Multiple Imports.

If a major Federal action having effects on the environment of the United States or the global commons requires preparation of an environmental impact statement, and if the action also has effects on the environment of a foreign nation, an environmental impact statement need not be prepared with respect to the effects on the environment of the foreign nation.

/s/ Jimmy Carter

THE WHITE HOUSE

January 4, 1979

Latif, Mohammad

From: Maxwell, Carl
Sent: Tuesday, May 01, 2001 1:34 PM
To: Fittipaldi, Mark
Cc: Latif, Mohammad; Dugan, Maureen
Subject: RE: UNDP Grant - Environmental Requirements

Thank you. This looks good to me. I think it gives them enough guidance yet not too overly demanding.

-----Original Message-----
From: Fittipaldi, Mark
Sent: Tuesday, May 01, 2001 12:39 PM
To: Maxwell, Carl
Cc: Latif, Mohammad; Dugan, Maureen
Subject: RE: UNDP Grant - Environmental Requirements

Thanks, Carl. This is helpful. Based on the additional information you have provided, I propose to revise my draft language as indicated below (with new language in blue font). Let me know if this captures what is needed.

Mark

"The Grantee shall review the environmental consequences of each of the activities financed by this Grant using the checklist attached hereto at Attachment ___ and, if pesticides are involved, the pesticide procedures attached here at Attachment ___. Based on such checklist and, if applicable, the pesticide procedures, the Grantee shall, prior to the implementation of any such activity, either (a) recommend mitigation measures or (b) determine, in consultation with the cognizant USAID environmental offer, whether an environmental assessment (EA) is necessary. Although it is anticipated that the activities financed by this Grant will not require EA's, if it is determined that an EA is warranted, the Grantee shall prepare the EA in accordance with 22 Code of Federal Regulations (CFR) Section 216, a copy of which is attached at Attachment _____. All checklists, recommended mitigation measures and EA's required by this paragraph shall be submitted to the E&E/ECA Cognizant Technical Officer for approval prior to beginning work on the activity in question. The Grantee shall require its contractors, sub-grantees, and all other entities with which it enters into subagreements to carry out the purposes of this Grant, to comply with the environmental requirements and procedures described in this paragraph and shall ensure that the checklists, recommended mitigation measures and EA's prepared by such contractors, sub-grantees or other entities are provided to USAID prior to the implementation of the activity in question."

-----Original Message-----
From: Maxwell, Carl
Sent: Tuesday, May 01, 2001 11:54 AM
To: Fittipaldi, Mark; Dugan, Maureen
Cc: Latif, Mohammad
Subject: RE: UNDP Grant - Environmental Requirements

Good questions. A mitigation or environmental management plan consists of the set of measures to be taken during implemention and operation to eliminate, offset, or reduce adverse environmental impacts to acceptable levels. At the level of the "Checklist" procedure, if the "Threshold decision" [*A formal Agency decision which determines, based on an Initial Environmental Examination, whether a proposed Agency action is a major action significantly affecting the environment.*] is Negative with conditions, the conditions will define the mitigation measures to eliminate, offset, or reduce the negative impact. The implementer is held responsible to assure these measures are carried out as part of the contract and/or agreement as the activity moves ahead. If on the other hand, the "Checklist" indicates that an activity is "Positive" that is, a proposed action has a "significant effect" on the environment (if it does significant harm to the environment - see explanation below), then an Environmental Assessment (EA) will be required. The purpose of the EA is to provide Agency and host country decision-makers with a full discussion of significant environmental effects of a proposed action. Included in the EA for the option selected are a set of recommended mitigation measures as well. EAs are usually not necessary for small-scale development activites. If an EA is required, then I would recommend that the PVO/NGO consult with the USAID Bureau Environmental Officer (BEO). The BEO will confirm whether an EA is needed. Different combinations of actors are responsible for the scoping document (see following definition), depending on the situation. Ideally, the EA process is cast as a development tool and learning opportunity for all partners. In any case, scoping precedes the Envirnomental Assessment. The party carrying out the program of activities being assessed, in this case the UNDP, is usually responsible for the EA, but USAID can provide initial advice and the BEO must also approve the EA.

Scoping as applied to an EA typically involves a consultative process that characterizes the "scope and significance of issues to be analyzed" and eliminates from further discussion issues that will not have a significant effect on the environment.

238

Significance of Impacts: Significance of a predicted impact depends on its *context* and *intensity*. **Context** varies with the setting. For example, the loss of one hectare of prk in an urban setting may be more significant than the same quantittive loss in a more rural setting, unless that hectare is habitat for an endangered species (or belongs to you!). A new or hehabilitated road in an urban area could be far less significant than the same road in a remote or wilderness setting. **Intensity** depends on the degree to which an action:

- affects public health or safety;
- affects unique characteristics of an area (culturally, archeologically or historically important resources, wetlands, ecologically critical areas, etc.);
- is likely to be highly controversial
- is highly uncertain or involves unique or unknown risks;
- establishes a precedent
- adversely affects nationally defined historic places
- adversely affects endangered or threatened species or habitat and the like; or
- is irreversible
- Thus, determining "significance" involves a judgment, tempered not only by applicable national or international laws protecting the environment, but also by societal perceptions of importance.
- ----Original Message----

From: Fittipaldi, Mark
Sent: Tuesday, May 01, 2001 9:24 AM
To: Maxwell, Carl; Dugan, Maureen
Subject: UNDP Grant - Environmental Requirements

Carl and Maureen: I have taken a first crack at drafting language for the Grant Agreement and the IEE based on our conversation yesterday. Also, I still have some clarification questions which follow my suggested paragraph. Let me know what you think of the proposed language and if you have answers to any of my questions.

Thanks,

Mark

"The Grantee shall review the environmental consequences of each of the activities financed by this Grant using the checklist attached hereto at Attachment ___ and, if pesticides are involved, the pesticide procedures attached here at Attachment ___. Based on such checklist and, if applicable, the pesticide procedures, the Grantee will recommend mitigation measures before any activity is begun, and will determine whether an environmental assessment (EA) for any specific activity is warranted. Although it is anticipated that the activities financed by this Grant will not require EA's, if the Grantee determines that an EA is warranted, the Grantee shall prepare the EA in accordance with 22 Code of Federal Regulations (CFR) Section 216, a copy of which is attached at Attachment _____. All checklists, recommended mitigation measures and EA's required by this paragraph shall be submitted to the E&E/ECA Cognizant Technical Officer for approval prior to beginning work. The Grantee shall require its contractors, sub-grantees, and all other entities with which it enters into subagreements to carry out the purposes of this Grant, to comply with the environmental requirements and procedures described in this paragraph."

Questions:

What is the difference between mitigation recommendations and an EA? In other words, if the recommends mitigation measures, does it still have to prepare an EA or, if they do an EA, do they still have to recommend mitigation measures?

Does the Grantee submit recommended mitigation measures to USAID and do we have to approve?

If a Grantee's contractor, subgrantee, etc., prepares an EA, to whom is it given for review? The Grantee? USAID? If it's USAID, then we have to require the Grantee to get the EA from its contractor and provide it to us. (*I can craft the language if this is the case.*)

facsimile transmittal

To:	Kent Larson	**Fax:**	995-32-001-013
From:	Carl F. Maxwell	**Date:**	05/01/00
Re:	Pesticides	**Pages:**	7
CC:	Alexandra Burke, Mohammad Latif		

☐ Urgent x For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycl

Kent, please find attached a very useful guide in preparing an IEE for pesticides. This is in answer to the questions you raised in your email as follows:

I have a couple of questions for an IEE we are preparing for an activity here in Azerbaijan.

1. Am I right in assuming that any activity involving the use of fertilizer and herbicides will need a full environmental assessment, or could an IEE with detailed mitigation and monitoring measures possibly be sufficient?

Answer: It depends. An IEE is sufficient as long as it follows the 22CFR 216.3 (b)(1)(i)(a-l). See sample Pesticide Evaluation Report and Safe Use Action Plan for a Mozambique cashew project using pesticides which meets the requirements and documented accordingly in an IEE.

2. The activity we are considering supporting involves credit to agricultural cooperatives, so any ag inputs such as fertilizer or herbicides would not be bought directly by the project, but would be on the list of potential purchases by the farmers themselves. Does that make a difference for purposes of the IEE?

Answer: Follow the money. If it's USAID funded, we need to make sure an IEE is done.

Analysis

The following analysis follows the recommended outline, as per 22 CFR 216.3 (b) (1) (i) (a-l):

USEPA's registration status of the requested pesticide:

(a) The USEPA registration of the pesticides proposed for use in the trials is indicated in Table 2 below. All of the pesticides proposed are registered with the USEPA for use on various crops grown in the USA. All the pesticides are available in Mozambique and will be obtained through local suppliers.

Table 2:

Common Name	Trade Name	Action	Toxicity Class	Oral LD50	EPA signal word	Mozambique signal word	EPA registration No
Triadimenol	Bayfidan (ec)	Fungicide	III	700 mg/kg	Caution	Perigroso II	7501-91
Hexaconazole	Anvil (ec)	Fungicide	IV	6,071 mg/kg	Caution	Cuidado III	EPA import tolerance 40 CFR 180
Sulfur	Dusting Sulfur (dust)	Fungicide	IV	>5,000 mg/kg	Caution	Cuidado III	Non-toxic

(b) *Basis for selection of the requested pesticide:*

The insecticides selected for the demonstrations are listed in Table 2 above. The pesticides were selected as based on the results of the last two years trials, biological efficacy, human health and environmental factors. The fungicides, triadimenol (Bayfidan), hexaconazole (Anvil) and sulfur will be used for the control of the powdery mildew disease (*Oidium anarcardii* Noak)..

Non-chemical control methods consisting of cultural methods will also be demonstrated. These demonstrations will be conducted by World Vision staff on farmer's trees. The objective of part of these demonstrations is to show a non-chemical method for controlling PMD, which consists of the removal of non-productive cashew leaves or branches that serve as a source of PMD inoculum. In all of the demonstrations weed control under and around the trees will be conducted manually by hand removal.

No herbicides will be used.

(c) *Extent to which the proposed pesticide is part of an IPM program:*

The approach to the control of PMD which is being advocated will use an integrated package of practices already developed and broadly applied in Tanzania and more recently tested in Mozambique. An IPM approach will be used which is aimed combining various cultural practices which will reduce or delay the spread of the disease and only if really necessary using the minimum amounts of pesticide needed to control PMD. Farmers will be trained in scouting methods to identify the threshold levels at which the pesticides should be applied as well as safe handling, storage, application and disposal techniques. Non-chemical methods are used as far as possible for PMD control though in most cases it has been shown that pesticides must finally be used to effectively control the disease. The package of practices to be demonstrated, including the sanitation activities, have been shown to retard the onset of PMD thus reducing the number of pesticide applications necessary to control PMD. Where clearly identified threshold levels have been reached safe and least-toxic pesticides will be used for further control. These pesticides are safe to applicators when used

to be minimal when the instructions on the label are followed. Applications will be made early in the morning when bees are inactive and the pesticides have been shown to have minimal effects on natural enemies. It is recognized that heavy and continuous use of sulfur on trees can acidify the soil beneath the trees. This may or may not be a significant problem, depending on whether the soil is acid or alkaline. Sulfur will only be recommended for use in the few areas where there is no water for mixing with the organic pesticides and it is not expected that the limited applications involved will have a significant adverse impact. Minimum levels of sulfur will be used to accomplish PMD control and in a number of sites the soil will be tested before and after the demonstrations to assess the effects on the soils, if any.

Measures to minimize and mitigate hazards: The choice of least toxic chemicals suitable to effectively control PMD, the use of protective equipment by the applicators and the training of staff and those who will apply the pesticide in the safe and proper use of pesticides will minimize potential hazards. Longer term environmental monitoring will be applied to areas where sulfur will be used to monitor its effect on soil pH levels.

(f) *Effectiveness of the requested pesticide for the proposed use:*

1) Triadimenol (Bayfidan®):

Triadimenol is a systemic fungicide that provides effective control of PMD and will be used as a foliar spray in chemical control of PMD trial. Literature indicates that this fungicide is highly effective against PMD in cashew as based on trials conducted by Topper and Bema in Tanzania, in the control of grape fungi in South Africa and against powdery mildew of apple in Israel. It was safe to predatory anthropods in South African vineyards.

2) Hexaconazole (Anvil®):

Hexaconazole is a fungicide that provides effective control of PMD of cashews. It will be used as a foliar spray in chemical control of PMD trial. Literature indicates that this fungicide is highly effective against PMD in cashew as based on trials conducted by Topper and Bema in Tanzania. It was also shown to provide excellent control of powdery mildew in apples in Israel and was safe to predatory insects.

3) Sulfur (Dust)

Sulfur is a fungicide that provides effective control of PMD on cashew and will be used as a dust in chemical control
trial. Literature indicates that this fungicide is highly effective against PMD in cashew based on trials conducted by Topper and Bema in Tanzania.

The inorganic mineral-based fungicidal product to be used in the proposed program has been selected as optimum to effectively control PMD. None of the registered botanical insecticides are sufficiently effective to control the disease in question. The application rates selected are based on experience achieved in previously conducted trials and will be applied at a rate as low as possible whilst still meeting controlling PMD.

(g) *Compatibility of the proposed pesticide with target and non-target ecosystems:*

Adverse impacts on the environment which may be caused by the use of the proposed pesticides are not expected because of the intrinsically low toxicity of the pesticides selected and the safe manner in which they will be applied. Site selection and dosage rates will be such that run-off will be minimized and pesticides will not contaminate bodies of water. Applications will be made early in the morning when wind speed is reduced and the atmosphere is most humid so improving the adherence of the pesticide to the leaves of the target trees

demonstrations and training sessions will be acquired.

During usage, applicators will be trained to follow the instructions on the label, in the proper sequence. No-one will handle the product without the proper protective clothing and soap and water will be available for immediate cleaning of hands and eyes. Partially-used containers will be securely sealed during the application process and returned to storage. After completing the application, the empty containers will be punctured and burnt (as per the Mozambican 'Pesticide Guide'). The clothing and other equipment used during the application will be thoroughly cleaned (the clothes will be washed separately from other clothes). The pesticides will be stored in the locked storerooms.

Application will take place in the early morning (prior to 10:00 AM), avoiding the hottest and windiest part of the day. No food or drink will be consumed on the site during application. Should anyone show signs of pesticide poisoning, the application will be stopped and first aid will be immediately sought.

The demonstrations will be set up following prescribed protocols and closely monitored by the WV-Moz agronomists who will collect and analyze the results of the program and present findings in the annual WV report.

ANNEX B

ACTION PLAN

PESTICIDE ENVIRONMENTAL REVIEW AND SAFE USE ~~APPLICATION~~ (PERSUAP)

Prepared As An Umbrella Document
For Use by USAID Cooperating Sponsors in Rwanda
ACDI/VOCA
Catholic Relief Services
World Vision International
Imlementing DAPs in FY 2000 - 2005

5.1 BACKGROUND AND ACTIVITY DESCRIPTION

The storage of grain in warehouses for over 2 months cannot be achieved without the use of the appropriate measures to control storage pests.

Pests such as Callosobrochus sp. and Sitophilus sp. thrive in the hot humid environments characteristic of Africa and will completely destroy a ton of maize in 2 months. It is therefore critical in food aid programs to ensure that methods are employed, both in the main and satellite (field) warehouses to ensure that grain intended for human consumption is kept free of pests and diseases during the lifetime of the program.

The pesticide commonly used in Rwanda is 'Phostoxin'. The active ingredient of this product is Aluminum Phosphide which produces Phosphine gas when exposed to the atmosphere.

5.2 PESTICIDE PROCEDURES

5.2.1 The EPA registration Status of the Requested Pesticide

Aluminum phosphide is classified as restricted use by USEPA, 12/06/95. World Vision will therefore use this pesticide in strict accordance with the manufacturer's instructions.

5.2.2 Basis for Selection of Requested Pesticide

After having taken into consideration the need for the control of storage pests during the DAP program, a survey was made in Rwanda in order to determine the range of pesticides on the local market that were not restricted by the USEPA.

Of the pesticides available, 'Actellic', an organophosphorus compund, and Phostoxin; active ingredient Aluminum Phosphide; were selected on the basis of their effectiveness in the control of pests as well as their classification by the USEPA.

Although phosphine gas has a high mammalian toxicity, this pesticide does not require mixing, spraying or pouring and therefore it is relatively easy to control dermal, oral, eye or respiratory exposure.

This pesticide, being a gas, does not leave solid or liquid residues when applied on the grain and does not therefore contaminate the grain after treatment. The Actellic formulation available was, on the other hand, a red powder that discolored the treated grain.

Phostoxin was not only readily available on the market, but was found to be used by the Ministry of Agriculture as well as the private pest control companies. There was a clear indication that the proper expertise existed in Rwanda in the use of Aluminum Phosphide for the control of storage pests in grain.

5.2.3 Extent to Which proposed Pesticides Are Part of Integrated Pest Management Approach

The frequency of application of this pesticide will be minimized as a result of the implementation of proper warehousing procedures. These will include regular inspections and basic warehouse sanitation. Stored grain will also be maintained at 12% moisture content by being kept in warehouses with adequate ventilation.

5.2.4 Proposed Methods of Application

The fumigation of grain will be contracted to private pest control companies who have the expertise in the use of Aluminum Phosphide.

The grain to be fumigated will be placed in air-tight polythene bags into which the phostoxin tablets will be placed. The manufacturer's recommendations will be adhered to concerning the quantity of product per weight of grain. This will be left for 3 days after which the bags will be opened, aired and re-packed.

Warehouse staff at each location will be trained in the potential hazards of not observing the application instructions and wi

5.2.5 Acute or Long-Term Toxicological Hazards

This chemical has an LD_{50} (inhalation) of about 0.2 mg/l and is therefore highly toxic when inhaled. Its use will not however have any long-term effects on the environment because it will be used only within the confined space of the warehouse.

World Vision will ask the Ministry of the Environment to conduct a separate assessment of the use of this product by the private pest cntrol cmpany in order to ensure that the short or long-term toxicological hazards are non-existent.

5.2.6 Effectiveness of Requested Pesticide for Proposed Use

Hydrogen Phosphide is a gas with a high penetrating power and will kill the eggs, larvae and pupae of all grain insects inside the kernel. It will therefore kill all the growth stages of Sitophilus sp. and Calosobrochus sp. that are normally found in stored corn and beans.
Its effectiveness in the control of storage pests has made it the preferred pesticide by the Ministry of Agriculture.

5.2.7 Compatibility of Proposed Pesticide with Target and Non-Target Ecosystems

This will not impact any ecosystems since the fumigation of grain will only be carried out in secure warehouses.

5.2.8 Conditions Under Which Pesticide is to be Used

Fumigation with Phostoxin will be conducted only in warehouses. The grain will be placed in air-tight plastic bags into which phostoxin tablets will be placed in accordance with the recommended dosages given by the manufacturer.

5.2.9 Availability and Effectiveness of Other pesticides or Alternatives

An alternative to the use of phostoxin in Rwanda is Actellic. This is an organophosphorus compound that is commonly found in Rwanda. It has a lower mammalian toxicity than phostoxin and acts as a choline esterase inhibitor in toxic concentrations. Actellic is available in Rwanda in a powder formulation and needs to be mixed with the grain during treatment. It however leaves a solid and colored residue on the surface of the grain thus reducing the acceptability of the grain for consumption.

5.2.10 Requesting Country's Ability to Regulate

The sale of phostoxin and other potentially hazardous chemicals is not effectively controlled by Rwandan law however, the Ministry of the Environment has stringent control measures concerning its use. Private companies specialized in fumigation are however registered with the government and have personnel qualified to handle these chemicals.

5.2.11 Provision Made for Training of Users

The fumigation of stored grain will be contracted out to private pest control companies. World Vision staff who will be closely associated with the process, e.g. Storekeepers will be properly trained by staff from the ministry of the environment on the possible hazards due to non-compliance with the safety regulations.

5.2.12 Provisions Made for Monitoring Use

The provisions made by the pest control company for monitoring the use of this product will be examined for compliance with USEPA procedures and regulations. This examination will be done by officials of the ministry of the environment.

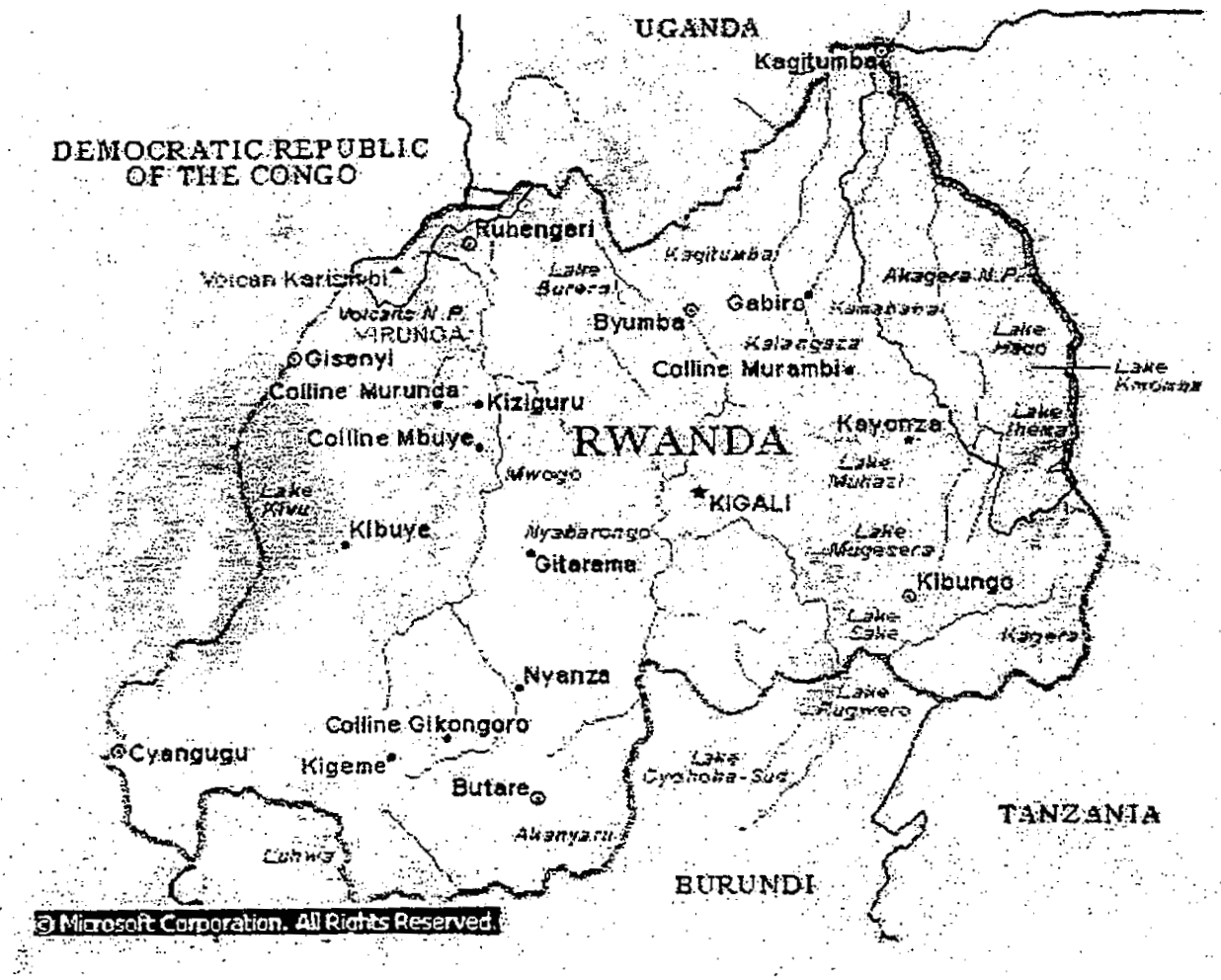


Figure 1 The proposed project areas are near the towns of Butare and Kibuye
Other potential sites lie in the countryside between the towns of Butare and Gitarama.

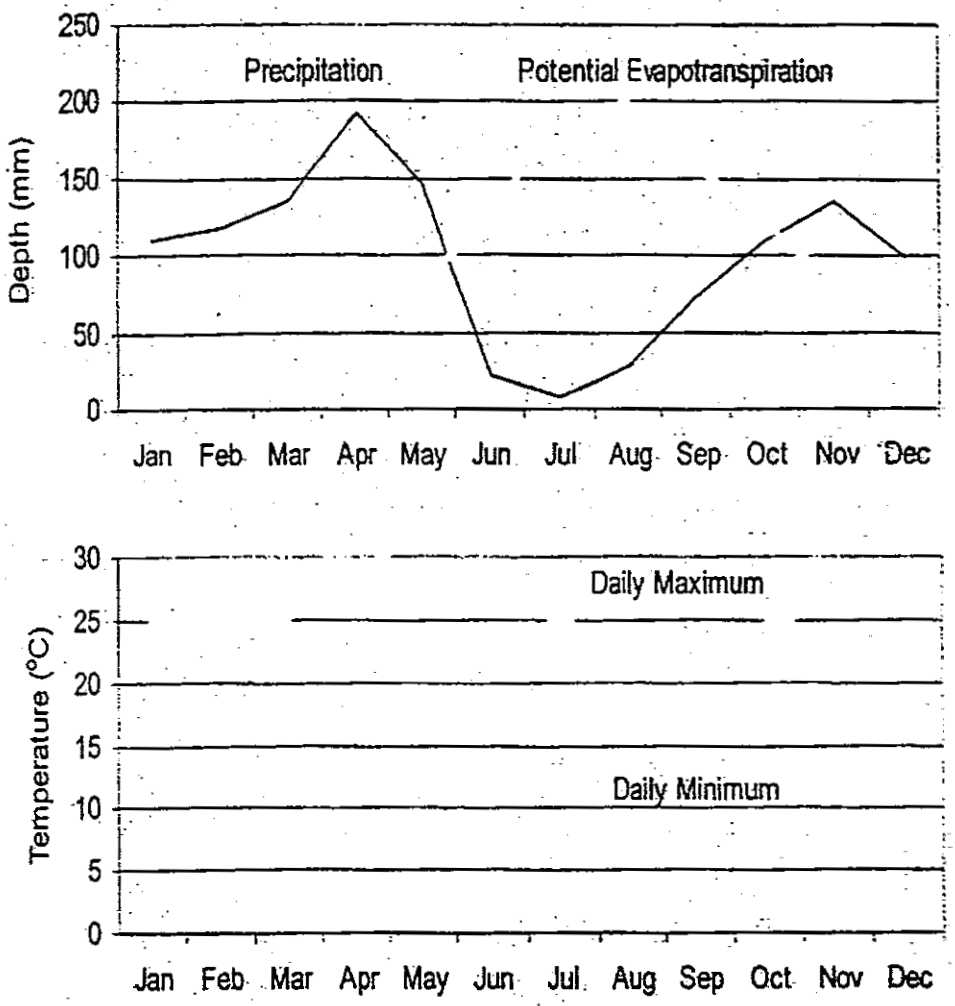


Figure 2: Climatic Data for the south-central region of Rwanda

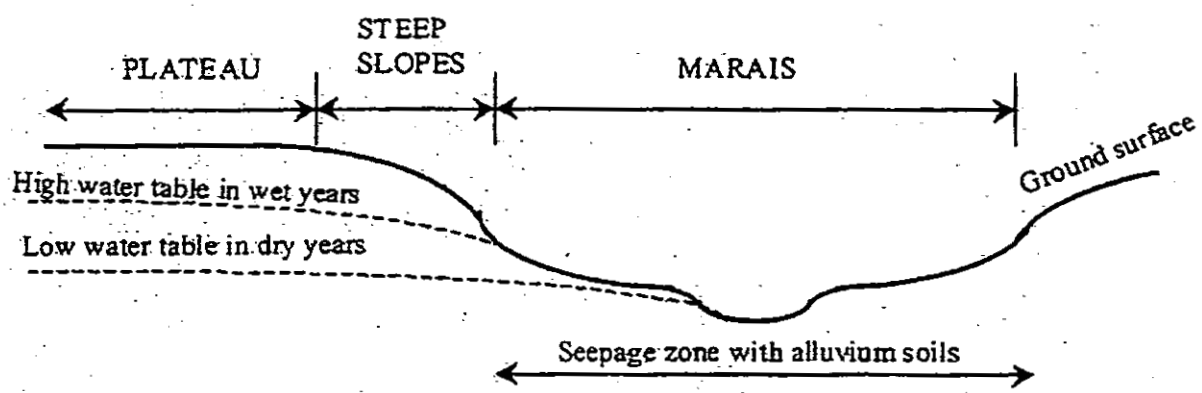


Figure 3: Typical *Marais* cross-section

Box C.2 Pesticides Classified as Restricted Use by USEPA[1]

Acetamide
Acetic acid
Acetochlor
Acrolein
Acrylonitrile
Alachlor
Aldicarb
Allyl alcohol
Alpha-clorohydrin
Aluminum phosphide
Amitraz
Amitrole
Arsenic acid
Arsenic pentoxide
Atrazine
Avermectin
Avitrol
Azinphos methyl

Bendiocarb
Benzoic acid
Biphenthrin
Bis (Tributyltin) oxide
Brodifacoum
Butylate

Cadmium chloride
Calcium cyanide
Carbofuran
Carbon dioxide
Carbon tetrachloride
Chlordane
Chlordimeform
Chlorfenvinphos
Chlorobenzilate
Chlorophacinone
Chloropicrin
Chlorothalonil
Chlorothoxyfos
Chlorpyrifos (EC on wheat)
Chromic acid
Clofentezine
Coal tar
Coal tar creosote
Copper oxychloride
Coumaphos
Creosote
Creosote oil
Cubé resins other than rote
Cupric oxide
Cuprous oxide
Cyanazine
Cycloheximide
Cyfluthrin
Cyhalothrin
Cypermethrin

DBCP
Deltamethrin
Demeton
Diallate
Diazinon
Dichloropropene
Diclofop methyl
Dicrotophos
Diflubenzuron
Dioxathion
Diphacinone
Disulfoton
Dodemorph

Endrin
EPN
EPTC
Ethion
Ethoprop
Ethyl parathion
Ethylene dibromide
Ethylene dichloride

Fenamiphos
Fenbutatin-oxide
Fenitrothion
Fenpropathrin
Fensulfothion
Fenthion
Fenvalerate
Flucythrinate
Fluoroacetamide
Fluvalinate
Fonofos

Hydrocyanic acid
Hydrogen cyanamide

Imazaquin
Isazofos
Isofenphos

Lambda-cyhalothrin
Lindane

Magnesium phosphide
Methamidophos
Methidathion
Methiocarb
Methomyl
Methyl bromide
Methyl isothiocyanate
Methyl parathion
Metolachlor
Mevinphos
Monocrotophos

Niclosamide
Nicotine
Nitrogen, liquid

Oxamyl
Oxidemeton methyl

Paraquat
Pentachlorophenol
Permethrin
Phorate
Phosacetim
Phosalone
Phosphamidon
Phostebupirin
Picloram
Picloram, isooctyl ester
Picloram, potassium salt
Picloram, triiosopropanolam
Piperonyl butoxide
Potassium pentachlorophenate
Profenophos
Pronamide
Propanoic acid
Propetamphos

Resmethrin
Rotanone

S-Fenvalerate
Simazine
Sodium arsenate
Sodium cyanide
Sodium dichromate
Sodium fluoroacetate
Sodium hydroxide
Sodium methyldithiocarbamate
Sodium pyroarsenate
Starlicide
Strychnine
Sulfotepp
Sulfuric acid
Sulfuryl fluoride
Sulprofos

Tefluthrin
TEPP
Terbufos
Tergitol
TFM
Toxaphene
Tralomethrin
Tributyltin fluoride
Tributyltin methacrylate
Trifluralin
Triphenyltin hydroxide

Zinc phosphide

[1] From USEPA's Restricted Use Pesticide (RUP) List, 12/06/95. This list contains only accepted common (generic) names. Trade names are far more numerous.

Box C.1 Pesticides Cancelled or Suspended by USEPA

The following is a list of generic or accepted common names for pesticides—at least some of whose uses are suspended, cancelled, or restricted in the United States by the U.S. Environmental Protection Agency (USEPA). Note that thousands of trade names exist, few of which appear on this list. Carefully examine the label of any pesticide to ascertain whether the accepted common (or generic) name appears on this list.

Alar
Aldrin
Amitraz
Arsenic Trioxide
Benomyl
BHC
Bromoxynil
Bromoxynil Butyrate
Cadmium
Calcium Arsenate
Captafol
Captan
Carbon Tetrachloride
Chloranil
Chlordane
Chlordimeform
Chlorbenzilate
Copper Arsenate
Creosote
Cyanazine
Cyhexatin
Daminozide
DBCP
DDD (TDE)
DDT
2,4-D
Diallate
Dicofol
Dieldrin
Dimethoate
Dinocap
Dinoseb
EBDCs
EDB
Endrin
EPN
Fluoroacetamide
Heptachlor
Kepone
Lead Arsenate
Lindane
Mercury
Metaldehyde
Mirex
Monocrotophos
OMPA
10,10' Oxybisphenoxarsine
Oxyfluorfen
Parathion
PCNB
Pentachlorophenol
Phenarsazine Chloride
PCBs
Polychlorinated Terphenyls
Pronamide
Safrole
Silvex
Sodium Arsenate
Sodium Arsenite
Sodium Cyanide
Sodium Fluoride
Sodium Monofluoroacetate
Strobane
Strychnine
2,4,5-T
2,4,5-TCP
Thallium Sulfate
TOK
Toxaphene
Tributyltin
Trifluralin
Vinyl Chloride
Wood Preservatives: Calcium Arsenate, Creosote, Pentachlorophenol, Sodium Arsenate, and Sodium Arsenite

Source: USEPA, 1990.

250

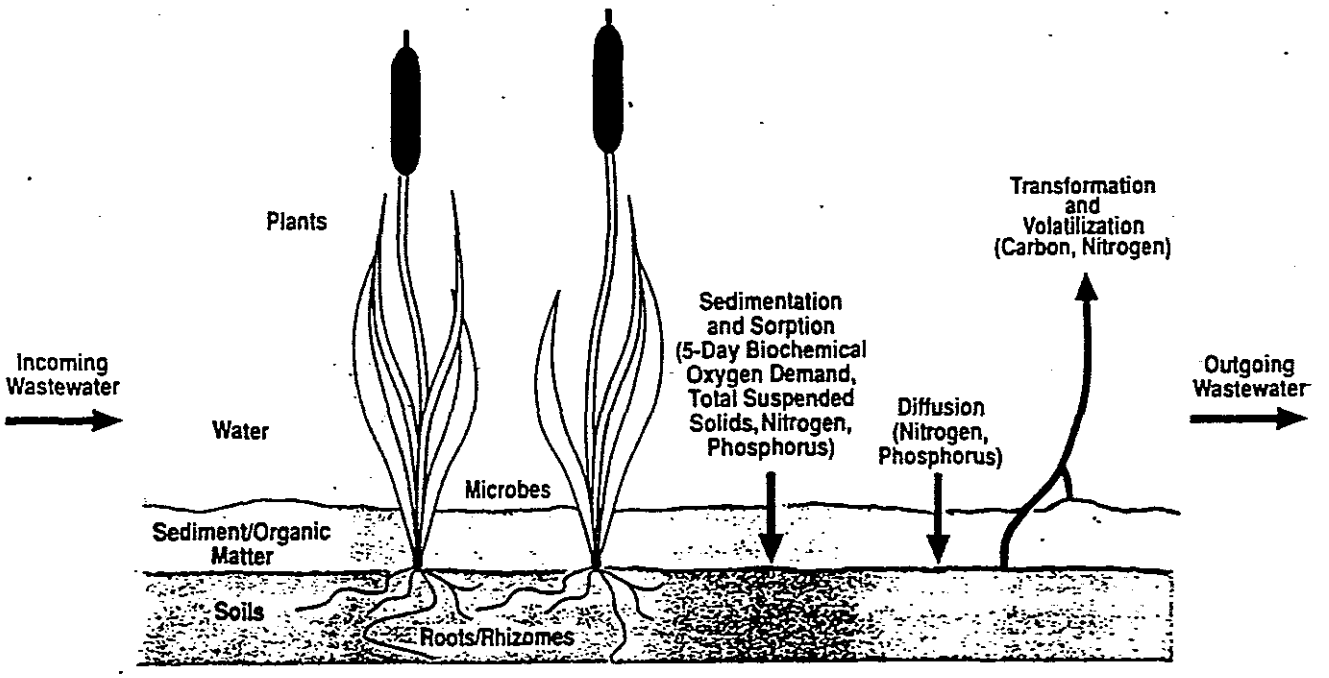
CONSTRUCTED WETLANDS

Once considered worthless, wetlands are now recognized as one of the most diverse and productive ecosystems in the world. Wetlands clean water, produce food and fiber, provide wildlife habitat, recharge the groundwater, reduce flooding, and offer recreational opportunities.

All treatment wetlands, constructed or natural, have the same general components of landform, water, soil, plants, microbes, plant litter (also called organic matter or detritus), and fauna. As a result of physical, biological, and chemical processes in the wetland environment, many pollutants in the water flowing through the system are transformed or inactivated. The low flow rate of the water and the long time the water stays in the wetland (called residence time) result in the settling and trapping of solids in the wastewater.

The plants provide a place for microbes to attach. These microbes take nutrients from the water to grow. The processes by which microbes transform and remove pollutants from the water are complex. With nitrogen, for example, microbes ammonify nitrogen (convert ammonia to nitrite and nitrate, which is used by bacteria and some plants for growth); and denitrify nitrogen (volatilize nitrogen, which is lost to the atmosphere). As a result of these processes, excess nitrogen is removed from the water.

Wetland plants also absorb nutrients, and like the microbes, they convert the nutrients into a form that they use for growth. As the process of uptake, transformation, and release of nutrients in the wetland repeats itself, some of the nutrients in the system are trapped in the soils or released into the air. The result is water that is cleaner than when it entered the wetland.



RESTORING WATER QUALITY - CASE STUDIES[1]

Following are two case studies of constructed wetlands in California and Florida:

Case study #1: Reducing nitrite levels from treated wastewater flowing (60 cubic feet per second or 147,000 cu.mts/day) into the Santa Ana River in Orange County California[2].

Within 2,400 acres (971 hectares) of land the District owns behind Prado Dam, lies nearly 465 acres (18.8 hectares) of constructed wetlands, including a system of 50 shallow ponds (now used for duck hunting).

Wetlands are very effective and economical means for the removal of nitrate, currently removing nearly 360 tons a year from the Santa Ana River. There is another benefit to wetland nitrate purification. With most manmade water nitrate removal methods there is a nitrate residue that must be disposed of in landfills or the ocean. With the natural wetland process, the nitrates are converted into harmless nitrogen gas, which makes up 80% of our atmosphere.

The wetlands are an extremely cost effective treatment process. Removal of nitrate at a conventional treatment plant would cost approximately $15.00 a pound ($6.82/kilo) compared to about $0.50 a pound using the natural wetland process.

The wetland project (60-cfs flow) potentially saves upstream wastewater discharges the cost of upgrading their treatment facilities in order to meet the water quality requirements at Prado Dam.

Constructed wetlands project cost (1977): $2.5 million

[1] Excerpt from brochure funded by Nutrient Enrichment Issue Committee of the Gulf of Mexico Program (GMP). The EPA provided financial support. CH2M Hill was the contractor (Gainesville, Florida).
[2] Prado Wetlands Brochure; Orange County Water District, 10500 Ellis Ave., Fountain Valley, CA 92728

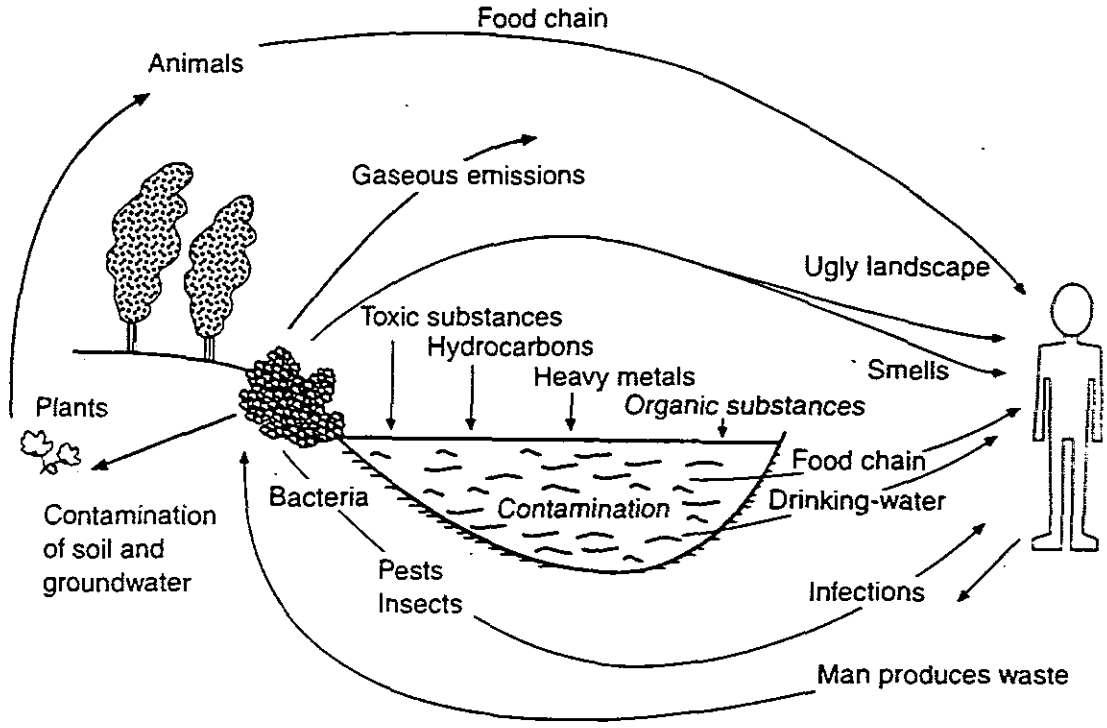
Case study #2: The Wakodahatchee Wetlands[3], Palm Beach County, Florida. The constructed wetlands at Wakodahatchee Wetlands benefit the community in a variety of ways, combining the seemingly unrelated functions of water treatment, wildlife habitat and recreation into a wetlands ecosystem that is fully accessible to the public. Created wetlands expand the habitat for an array of plant and animal species faced with the increasing pressures of urbanization and agricultural development.

The Wakodahatchee Wetland is located in suburban Delray Beach, Florida. The Wakodahatchee Wetlands have attracted an abundant variety of wildlife, including turtles, frogs, otters, alligators and birds. More than 140 different species of birds have been spotted at the site. These species thrive in the various wetland zones. The wetlands provide a variety of important environmental functions:

- Provide food and habitat for many important wildlife species, including many of Florida's threatened and endangered species
- Detain stormwaters, protecting downstream areas from flooding
- Provide a high level of plant productivity, the basis of life for all animals
- Naturally purify waters containing nutrients like nitrogen and phosphorus, without using fossil-fuel-based energies or producing sludge

[3] Palm Beach County, Board of County Commissioners, Water Utilities Department; Brenda Duffey, Sr. Public Relations Specialist: PO Box 16097, West Palm Beach, Florida 33416; (561) 434-5372 or EMAIL: [bduffey@co.palm-beach.fl.us]

Fig. 8.11 Routes of exposure to hazards caused by open dumping[a]



8.5 Land disposal

8.5.1 *Municipal disposal sites*

If a municipality or medical authority genuinely lacks the means to treat wastes before disposal, the use of a landfill has to be regarded as an acceptable disposal route. Allowing health-care waste to accumulate at hospitals or elsewhere constitutes a far higher risk of the transmission of infection than careful disposal in a municipal landfill, even if the site is not designed to the standard used in higher-income countries. The primary objections to landfill disposal of hazardous health-care waste, especially untreated waste, may be cultural or religious or based on a perceived risk of the release of pathogens to air and water or on the risk of access by scavengers.

There are two distinct types of waste disposal to land—*open dumps* and *sanitary landfills*.

- *Open dumps* are characterized by the uncontrolled and scattered deposit of wastes at a site; this leads to acute pollution problems, fires, higher risks of disease transmission, and open access to scavengers and animals. **Health-care waste should not be deposited on or around open dumps.** The risk of either people or animals coming into contact with infectious pathogens is obvious, with the further risk of subsequent disease transmission, either directly through wounds, inhalation, or ingestion, or indirectly through the food chain or a pathogenic host species (see Fig. 8.11).
- *Sanitary landfills* are designed to have at least four advantages over open dumps: geological isolation of wastes from the environment, appropriate engineering preparations before the site is ready to accept wastes, staff present on site to control operations, and organized deposit and daily coverage of waste. Some of the rules applicable to

Box 8.14 Some essential elements for design and operation of sanitary landfills

- Access to site and working areas possible for waste delivery and site vehicles.
- Presence of site personnel capable of effective control of daily operations.
- Division of the site into manageable phases, appropriately prepared, before landfill starts.
- Adequate sealing of the base and sides of the site to minimize the movement of wastewater (leachate) off the site.
- Adequate mechanisms for leachate collection, and treatment systems if necessary.
- Organized deposit of wastes in a small area, allowing them to be spread, compacted, and covered daily.
- Surface water collection trenches around site boundaries.
- Construction of a final cover to minimize rainwater infiltration when each phase of the landfill is completed.

sanitary landfills are listed in Box 8.14. Disposing of certain types of health-care waste (infectious waste and small quantities of pharmaceutical waste) in sanitary landfills is acceptable; sanitary landfill prevents contamination of soil and of surface water and groundwater, and limits air pollution, smells, and direct contact with the public.

Upgrading from open dumping directly to sophisticated sanitary landfills may be technically and financially difficult for many municipalities. It has often been found impossible to sustain such efforts from the available local resources. However, this is no reason for municipal authorities to abandon the move towards safer land disposal techniques, perhaps by a gradual approach, such as that outlined in Box 8.15.

In the absence of sanitary landfills, any site from a controlled dump upwards could accept health-care waste and avoid any measurable increase in infection risk. The minimal requirements would be the following:

- an established system for rational and organized deposit of wastes which could be used to dispose of health-care wastes;
- some engineering work already completed to prepare the site to retain its wastes more effectively;
- rapid burial of the health-care waste, so that as much human or animal contact as possible is avoided.

It is further recommended that health-care waste be deposited in one of the two following ways:

Box 8.15 Proposed pathway for gradual upgrading of landfills[1]

1. **From open dumping to "controlled dumping"**. This involves reduction of the working area of the site to a more manageable size (2ha for a medium-size town), covering unneeded areas of the site with soil, extinguishing fires, and agreeing rules of on-site working with scavengers if they cannot be excluded completely.

2. **From controlled dumping to "engineered landfill"**. This involves the gradual adoption of engineering techniques to prevent surface water from entering the waste, extract and spread soils to cover wastes, gather wastewater (leachate) into lagoons, spread and compact waste into thinner layers, prepare new parts of the landfill with excavation equipment, and isolate the waste from the surrounding geology (e.g. with plastic sheeting under the waste).

3. **From engineered landfill to "sanitary landfill"**.This involves the continuing refinement, with increasing design and construction complexity, of the engineering techniques begun for engineered landfill. In addition, there should be landfill gas control measures, environmental monitoring points and bore holes (for monitoring air and groundwater quality), a highly organized and well trained work force, detailed record-keeping by the site office, and, in some circumstances, on-site treatment of leachate.

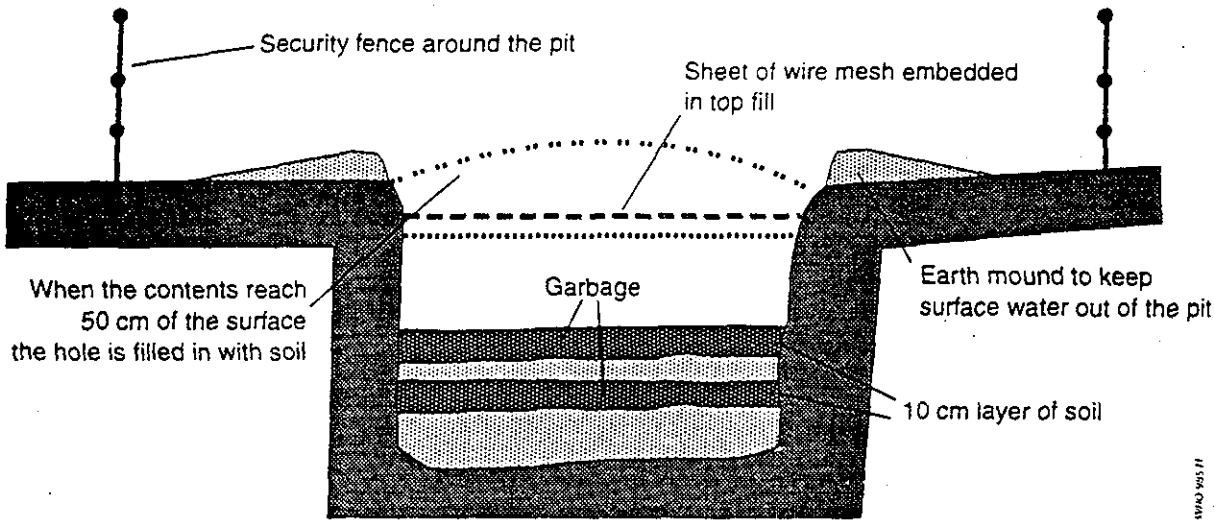
[1] Adapted from Rushbrook & Pugh (1997).

- In a shallow hollow excavated in mature municipal waste in the layer below the base of the working face, and immediately covered by a 2-metre layer of fresh municipal waste. Scavenging in this part of the site must be prevented. The same method is often used for hazardous solid industrial wastes; it is specifically intended to prevent animals and scavengers from re-excavating the deposited health-care waste.
- In a deeper (1–2 m) pit excavated in mature municipal waste (i.e. waste covered at least 3 months previously). The pit is then backfilled with the mature municipal waste that was removed. Scavenging in this part of the site must be prevented.

Alternatively, a special *small burial pit* could be prepared to receive health-care waste only. The pit should be 2 m deep and filled to a depth of 1–1.5 m. After each waste load, the waste should be covered with a soil layer 10–15 cm deep. If coverage with soil is not possible, lime may be deposited over the waste. In case of outbreak of an especially virulent infection (such as Ebola virus), both lime and soil cover may be added. Access to this dedicated disposal area should be restricted, and the use of a pit would make supervision by landfill staff easier and thus prevent scavenging. A typical example of pit design for health-care waste is shown in Fig. 8.12.

Before health-care wastes are sent for disposal, it is prudent to inspect landfill sites to ensure that there is sensible control of waste deposition.

Fig. 8.12 Example of a small burial pit for health-care waste



8.5.2 *Encapsulation*

Disposal of health-care waste in municipal landfills is less advisable if it is untreated than if it is pretreated. One option for pretreatment is encapsulation, which involves filling containers with waste, adding an immobilizing material, and sealing the containers. The process uses either cubic boxes made of high-density polyethylene or metallic drums, which are three-quarters filled with sharps and chemical or pharmaceutical residues. The containers or boxes are then filled up with a medium such as plastic foam, bituminous sand, cement mortar, or clay material. After the medium has dried, the containers are sealed and disposed of in landfill sites.

This process is relatively cheap, safe, and particularly appropriate for establishments that practise **minimal programmes** for the disposal of sharps and chemical or pharmaceutical residues. Encapsulation alone is not recommended for non-sharp infectious waste, but may be used in combination with burning of such waste. The main advantage of the process is that it is very effective in reducing the risk of scavengers gaining access to the hazardous health-care waste.

8.5.3 *Safe burial on hospital premises*

In health-care establishments that use minimal programmes for health-care waste management, particularly in remote locations, in temporary refugee encampments, or in areas experiencing exceptional hardship, the safe burial of waste on hospital premises may be the only viable option available at the time. However, certain basic rules should still be established by the hospital management:

- Access to the disposal site should be restricted to authorized personnel only.
- The burial site should be lined with a material of low permeability, such as clay, if available, to prevent pollution of any shallow groundwater that may subsequently reach nearby wells.

- Only hazardous health-care waste should be buried. If general hospital waste were also buried on the premises, available space would be quickly filled up.
- Large quantities (>1 kg) of chemical wastes should not be buried at one time. Burying smaller quantities avoids serious problems of environmental pollution.
- The burial site should be managed as a landfill, with each layer of waste being covered with a layer of earth to prevent odours, as well as to prevent rodents and insects proliferating.

The safety of waste burial depends critically on rational operational practices. The design and use of the burial pit are described in the previous section and illustrated in Fig. 8.12. The bottom of the pit should be at least 1.5 metres higher than the groundwater level.

Table 8.4 Summary of main advantages and disadvantages of treatment and disposal options

Treatment/ disposal method	Advantages	Disadvantages
Rotary kiln	Adequate for all infectious waste, most chemical waste, and pharmaceutical waste.	High investment and operating costs.
Pyrolytic incineration	Very high disinfection efficiency. Adequate for all infectious waste and most pharmaceutical and chemical waste.	Incomplete destruction of cytotoxics. Relatively high investment and operating costs.
Single-chamber incineration	Good disinfection efficiency. Drastic reduction of weight and volume of waste. The residues may be disposed of in landfills. No need for highly trained operators. Relatively low investment and operating costs.	Significant emissions of atmospheric pollutants. Need for periodic removal of slag and soot. Inefficiency in destroying thermally resistant chemicals and drugs such as cytotoxics.
Drum or brick incinerator	Drastic reduction of weight and volume of the waste Very low investment and operating costs	Destroys only 99% of microorganisms. No destruction of many chemicals and pharmaceuticals. Massive emission of black smoke, fly ash, toxic flue gas, and odours.
Chemical disinfection[a]	Highly efficient disinfection under good operating conditions. Some chemical disinfectants are relatively inexpensive. Drastic reduction in waste volume.	Requires highly qualified technicians for operation of the process. Uses hazardous substances that require comprehensive safety measures. Inadequate for pharmaceutical, chemical, and some types of infectious waste.
Wet thermal treatment[a]	Environmentally sound Drastic reduction in waste volume. Relatively low investment and operating costs.	Shredders are subject to frequent breakdowns and poor functioning. Operation requires qualified technicians. Inadequate for anatomical, pharmaceutical, and chemical waste and waste that is not readily steam-permeable.
Microwave irradiation	Good disinfection efficiency under appropriate operating conditions. Drastic reduction in waste volume. Environmentally sound.	Relatively high investment and operating costs. Potential operation and maintenance problems.
Encapsulation	Simple, low-cost, and safe. May also be applied to pharmaceuticals.	Not recommended for non-sharp infectious waste.
Safe burying	Low costs. Relatively safe if access to site is restricted and where natural infiltration is limited.	Safe only if access to site is limited and certain precautions are taken.
Inertization	Relatively inexpensive.	Not applicable to infectious waste.

[a]May not apply to more sophisticated, self-contained, commercial methods.

It should be borne in mind that safe on-site burial is practicable only for relatively limited periods, say 1–2 years, and for relatively small quantities of waste, say up to 5 or 10 tonnes in total. Where these conditions are exceeded, a longer-term solution, probably involving disposal at a municipal solid waste landfill, will need to be found.

8.5.4 *Land disposal of residues*

After disinfection or incineration, infectious health-care waste becomes non-risk waste and may be finally disposed of in landfill sites. However, certain types of health-care waste, such as anatomical waste, will still have an offensive visual impact after disinfection, and this is culturally unacceptable in many countries. Such wastes should therefore be made unrecognizable before disposal, for example by incineration. If this is not possible, these wastes should be placed in containers before disposal.

8.6 Inertization

The process of "inertization" involves mixing waste with cement and other substances before disposal in order to minimize the risk of toxic substances contained in the waste migrating into surface water or groundwater. It is especially suitable, for pharmaceuticals and for incineration ashes with a high metal content (in this case the process is also called "stabilization").

For the inertization of pharmaceutical waste, the packaging should be removed, the pharmaceuticals ground, and a mixture of water, lime, and cement added. A homogeneous mass is formed and cubes (e.g. of 1 m^3) or pellets are produced on site and then can be transported to a suitable storage site. Alternatively, the homogeneous mixture can be transported in liquid state to a landfill and poured into municipal waste.

The following are typical proportions for the mixture:

65% pharmaceutical waste
15% lime
15% cement
5% water

The process is reasonably inexpensive and can be performed using relatively unsophisticated equipment. Other than personnel, the main requirements are a grinder or road roller to crush the pharmaceuticals, a concrete mixer, and supplies of cement, lime, and water.

The main advantages and disadvantages of the various treatment and disposal options addressed in this handbook are outlined in Table 8.4.

Programmatic Environmental Assessment
USAID Agricultural Development Projects

Moldova

CITIZENS NETWORK FOR FOREIGN AFFAIRS

Compiled by

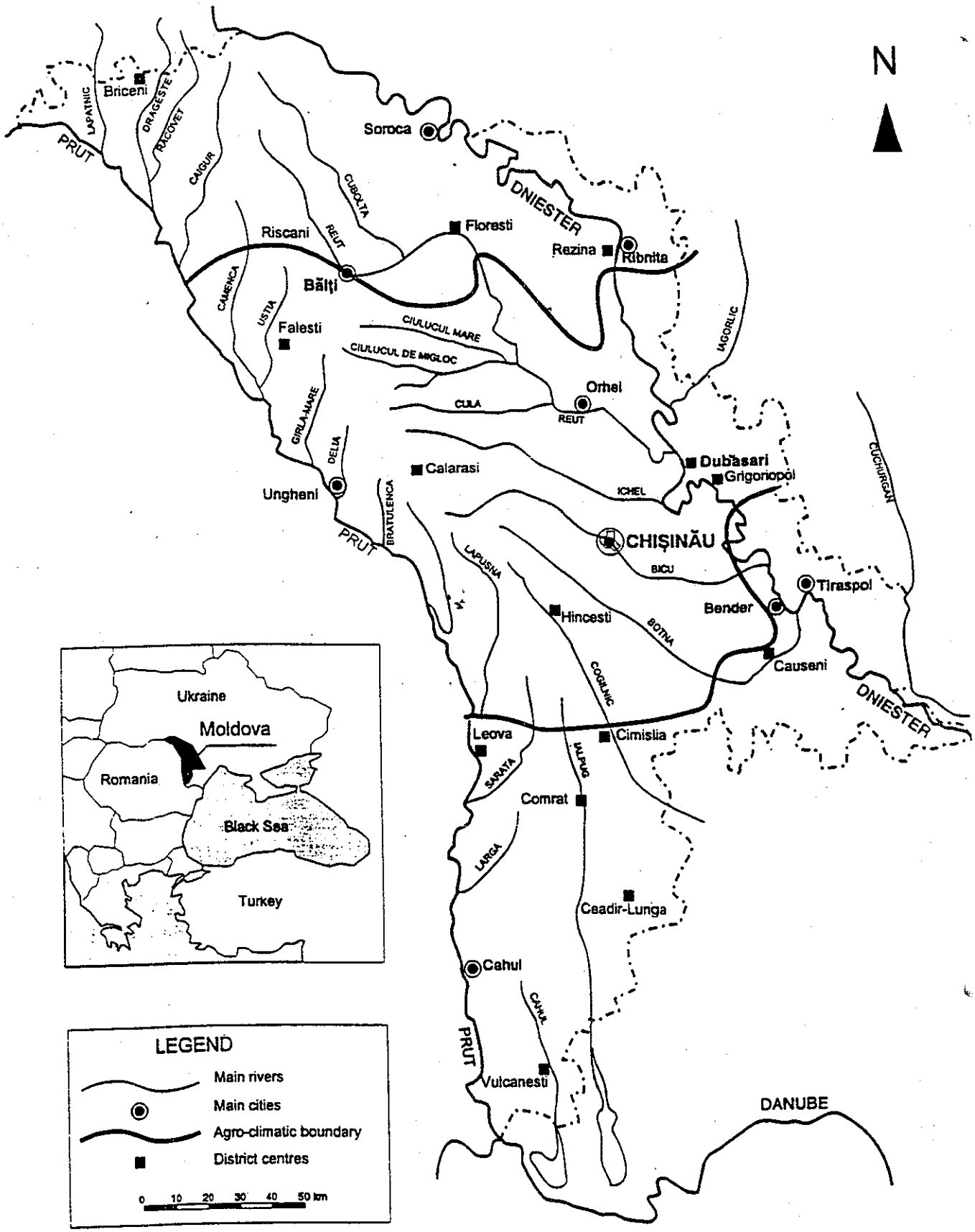
Wayne T. Williams
Constantin Mihailescu
Alya Leuca

Submitted to:

USAID/CHISINAU
March 2000

260

Map of the Republic of Moldova



Programmatic Environmental Assessment for the USAID Agricultural Development Projects in Moldova

Table of Contents

List of Tables and Maps v
Executive Summary vii
1. Purpose and Need for Programmatic Environmental Assessment 1
1.1 Purpose and Rationale for PEA 1
1.2 PEA Approach and Methodology 2
1.2.1 Projects Aimed for Production: Field and Fruit Crops 3
1.2.2 Dairy, Fruit and Vegetable Processing 5
1.2.3 Farm Service Centers: Fertilizers, Pesticides, Machinery 9
1.2.4 Farm Stores: Various Agricultural Inputs 11
1.2.4a Pesticide Procedures at Farm Service Centers and Farm Stores 17
1.2.4b List of Chemicals for Sale at Farm Stores and Farm Service Centers 20
1.2.5 Marketing 21
2. Baseline Data/ Affected Environment. Status of the Environment of Moldova 23
2.1 Agricultural Policy 23
2.2 Geographic Relief 24
2.3 Land Resources 24
2.3a Soil Erosion and Degradation 24
2.3b Land Use Management Factors Include: 26
2.3c Chemical Contamination 26
2.4 The Geological Structure of Moldova 27
2.4a Earthquakes and Landslides 28
2.4b Mineral Resources of Moldova 29
2.5 The Hydrographic Network 30
2.6 Water Quality and Water Utilization 31
2.6a Subterranean Water Resources 33
2.6b Underground Water Use, Water Quality and Wastewater Treatment 35
2.7 Climate of Moldova 36
2.7a The Seasons 37
2.7b Droughts and Desertification Processes 39
2.8 Flora and Fauna 40
Table 2.8.1 Specialized Ecosystem Types in Moldova 41
2.8.1a Forest Vegetation 41
2.8.1b Fauna Diversity 41
2.8.1c Protected Areas and Wetlands 42
2.9 Forest Resources 43
2.10 Air Pollution 44
2.11 Waste Management 45
2.12 Population 47
2.13 Health Risks Attributable to Agricultural Production 48
2.14 Recent Economic Performance Environmental Review 50
2.15 Major Data Gaps 54
3. Proposed Actions and Alternatives 56
3.1 Suggested Mitigation Guidelines for Regional Agricultural Projects 56
3.1.1 Mitigations and Recommendations for Farm Chemicals. Agrochemical Impacts 57
Table 3.1.1a Description of Some Pesticides Registered for Use in Moldova and Ukraine for Agricultural Purposes 62
3.1.1b General Mitigation Package applied to all Agrochemical Warehouses 64
Table 3.1.1c USAID Recommendations for Pesticide Warehouse Management 64
3.1.1d General Guidelines of Monsanto for Chemical Warehouse Management. 64

762

3.1.1e Spillage Mitigations 66
3.1.1f Pesticide Container Management Plan 66
3.1.1g Resale of Unused Pesticides 67
3.1.1h The Project Should Maintain a Qualified Pesticide Management Specialist in the Field 67
3.1.1i Water from Nearby Wells and Waterways Should Be Monitored for the Presence of Pesticides 67
Table 3.1.1j USAID Recommendations for Pesticide Application 68
Table 3.1.1k USAID Recommendations for Decontamination and Disposal of Pesticide Containers 68
3.1.2 Fertilizer Mitigations and Recommendations 69
3.1.2a Monitoring Requirements 69
3.1.2b Land and Water Issues Related to the Use of Fertilizers 69
3.1.2c Various Recommendations for Optimum Crop Yields 70
3.1.2d Recommended Application Rates of Mineral Fertilizers Supplied to Crops in Ukraine (nutrient, kg/ha) 71
3.1.2e Environmental Consequences 72
3.1.2f Specific Mitigations 72
3.1.3 An Emergency Preparedness Plan should be Developed 73
3.1.4 Fuel, Transport, Repair and Maintenance of Machinery 73
3.2 Alternatives to Proposed Activities 74
3.2.1 Criteria for Project Development 74
3.2.2 No Action Alternative 75
3.2.3 Alternative Options for Each Type of Activities 76
3.2.3a Projects Aimed for Production: Field and Fruit Crops 76
3.2.3b Projects for Dairy, Fruit and Vegetable Processing 77
3.2.3c Alternatives to Fruit and Vegetable Processing 77
3.2.3d Alternatives for Farm Service Centers and Farm Stores 78
3.2.3e Marketing 78
3.3 Aesthetics and Visual Quality 79
3.3.1 Mitigations for Aesthetics 79
3.4 Surface and Ground Water 79
3.5 Waste Management 80
3.5.1 Mitigations 80
3.6 Air Quality 81
3.7 Dairies 81
3.7.1 Environmental Considerations 81
3.7.2 Monitoring & Mitigation Package 82
3.7.2a Raw Milk Quantity and Quality 82
3.7.2b Water Quality 83
3.7.2c Prevention of Cattle Diseases 83
3.7.2d Sewer Effluents 83
3.7.2e Boilers. 83
3.7.2f Cold Room Storage 83
3.7.2g Permits and Licenses 84
3.8 Agricultural Production 84
3.8.1 Seeds and Seed Processing 85
3.8.2 Pesticide Use in Agriculture 85
3.8.3 Integrated Pest Management Approach 86
3.8.4 Quality and Quantity of Potential Effluents 86
3.8.5 Fuel Use and Fire Control 86
3.8.6 Identification of Potential Contaminant Migration Pathways of Possible Environmental Releases and Potential Receptors 87
3.8.6a Fertilizers 87
3.8.6b Pesticides 87
3.9 Mitigations Suggested for Apple Orchards and Vineyards 88
3.9.1 Resistant Varieties 88
3.9.2 Use of Bacillus Thurgensis 90
3.9.3 Use of Pheromone Traps 90
3.9.4 Labor Intensive Weed Control 90
3.9.5 Fruit Thinning 91
3.9.6 Coddling Moth Control 91
3.9.7 Aphid Control 91

3.9.8 Orchard Floor Management 91
3.9.9 Management of Introduced Varieties 92
3.9.10 Proposed Pesticide Use 92
3.9.11 Technical Specifications of Pesticides by Project Category 92
3.9.11a Horticultural Characteristics of Varieties Tested in the Cupcini Demonstration Orchard Project 93
3.9.11b Technical Specifications of Pesticides Used in the INCON Farm Service Center & Apple Demonstration Orchard Purchased by USAID 93
3.9.12 Quality and Quantity of Potential Effluents 95
3.9.13 Quantity and Quality of Air Emissions 95
3.9.14 Quantity and Quality of Solid Wastes and Potential Impacts from their Disposal 95
3.9.15 Ability of the Local Community or Government to Provide Emergency Response 95
4. Policy and Institutional Framework 95
4.1 Environmental Policy in Moldova 95
4.2. Institutional Framework 97
4.3 Moldovan Legal Framework 99
4.3.1 Projects Aimed for Production: Field and Fruit Crops 100
4.3.2 Dairy, Fruit and Vegetable Processing 101
4.3.3 Farm Service Centers: Fertilizers, Pesticides, Machinery 101
4.3.4 Farm Stores: Various Agricultural Inputs 101
4.3.5 Marketing, Storage and Transport 102
5. CNFA Activities in Moldova under USAID AgriBusiness Partnerships Project 103
5.1 CNFA Projects in Moldova 103
5.1.1 Future Plans 104
5.1.2 List Of Projects 106
5.2 Environmental Assessments of CNFA Projects 108
6. Public Consultation and Public Participation 109
6.1 Public Consultation 109
6.2 Public Participation 109
6.2.1 Building Public Awareness and Increasing Public Participation 110
7. Environmental Training, Management and Monitoring 110
7.1 Training 111
7.1.1 Projects aimed for Production: Field and Fruit Crops 111
7.1.2 Dairy, Fruit and Vegetable Processing 111
7.1.3 Farm Service Centers: Fertilizers, Pesticides, Machinery 111
7.1.4 Farm Stores: Various Agricultural Inputs 112
7.1.5 Fruit and Vegetable Marketing 112
7.2 Project Management and Monitoring 112
7.2.1 Monitoring Plan 113
8. List of Preparers 114
Bibliography 115
Annexes 117

A. Summary of PEA for Ukraine
B. Pertinent Maps of Moldova
C. Emergency Preparedness Plan
D. Emergency Preparedness Plan for Ammonium Management
E. FAO Data Concerning Import-Export and Chemicals Use in Moldova and Other Countries
F. Environmental Assessment Checklist
G. Interviews with Interested Parties

264

List of Tables and Maps

Tables

1 Table 2.8.1 Specialized Ecosystem Types in Moldova.....41

2 Table 3.1.1a Description of Some Pesticides Registered for Use in Moldova and Ukraine for Agricultural Purposes 62

3 Table 3.1.1c USAID Recommendations for Pesticide Warehouse Management.....64

4 Table 3.1.1j USAID Recommendations for Pesticide Application.....68

5 Table 3.1.1k USAID Recommendations for Decontamination and Disposal of Pesticide Containers 68

6 Table 3.9.11a Horticultural Characteristics of Varieties Tested in the Cupcini Demonstration Orchard Project.....93

7 Table 3.9.11b Technical Specifications of Pesticides Used in the INCON Farm Service Center & Apple Demonstration Orchard Purchased by USAID.....93

8 Table 4.2. Institutional Framework.....97

9 Table 4.3 Moldovan Legal Framework 99

10 Table 5.1.2 List of the CNFA Projects in Moldova.....106

11 Table 5.2 Environmental Assessments of CNFA Projects.....108

12 Table E1 Pesticides Imports of Moldova and Selected Countries.....Appendix E1

13 Table E2 Pesticides Exports of Moldova and selected Countries.....Appendix E2

14 Table E3 Herbicides Exports of Moldova and Selected Countries.....Appendix E3

15 Table E4 Fertilizers Production of Selected Countries.....Appendix E4

16 Table E5 Fertilizers Consumption in Moldova and Selected Countries.....Appendix E5

17 Table E6 Fertilizers Imports of Moldova and Selected Countries.....Appendix E6

18 Table E7 Potash Fertilizers Consumption in Moldova and Selected Countries.....App.E7

19 Table E8 Agricultural Requisites Import of Moldova and Selected Countries.....App.E8

Maps

1 Map 1. Map of the Republic of Moldova.....i

2 Map 2. Location of the Farm Service Centers, Farm Stores and Dairies in Moldova .22

3 Map 3. Future Development Strategies for Farm Service Centers and Farm Stores in Moldova.....107

4 Map 4. Demographic Change (1990-1996).....Appendix B1

5 Map 5. Eroded Soils.....Appendix B2

6 Map 6. Production Costs.....Appendix B3

7 Map 7. The Forest Protected Areas and Forest Stewardship Council Endorsed Sites.....Appendix B4

8 Map 8. Data about the Wheat Culture.....Appendix B5

9 Map 9. Data about the Maize Culture.....Appendix B6

10 Map 10. Data about the Tomato Culture.....Appendix B7

11 Map 11. Data about Orchards.....Appendix B8

264

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT
REGIONAL MISSION FOR UKRAINE, BELARUS AND MOLDOVA

Nyzhny Val 19, Kyiv, 04071 Ukraine **Fax: 380 44 462 5834, Phone: 380 44 462 5678**

March 26, 2001

TO: Carl Maxwell
E&E Bureau Environment Officer

FROM: Christopher D. Crowley
Mission Director

SUBJECT: Programmatic Environmental Assessment (PEA) for USAID Agricultural Activities in Moldova (March 2001 Version)

I am pleased to provide you with a copy of the revised PEA that was submitted recently by the Citizens Network for Foreign Affairs (CNFA) for your review and acceptance. CNFA has made substantial improvements to the document that was submitted originally in March 2000 and amended in November 2000.

The changes and additions to the PEA were made at the request of the Mission after review by the Mission Environment Officer, Dan Thompson, and in consultation with your office. I recommend that this PEA be accepted by USAID as a reference for future requests for Categorical Exclusion and Initial Environmental Examinations (IEEs) for USAID agriculture activities in Moldova. I expect that the mitigation measures and monitoring plans outlined in the PEA will become "conditions" to many of the IEEs that will be approved during the life of the agriculture program in Moldova. The PEA will not eliminate the need for environmental review of all future activities, but in many cases it will reduce significantly the level of effort needed to conduct each review.

Thank you for your assistance in reviewing the revised PEA. I look forward to your decision on this matter.

Memo

To : Bruce Campbell

From : Nermina Skejovic

Date : 04 / 28 / 97

Subject : **Environmental monitoring during construction of Brcko Railway Bridge**

The Brcko Railway Bridge was visited on 04/16/97. The following was observed:

OBSERVATIONS

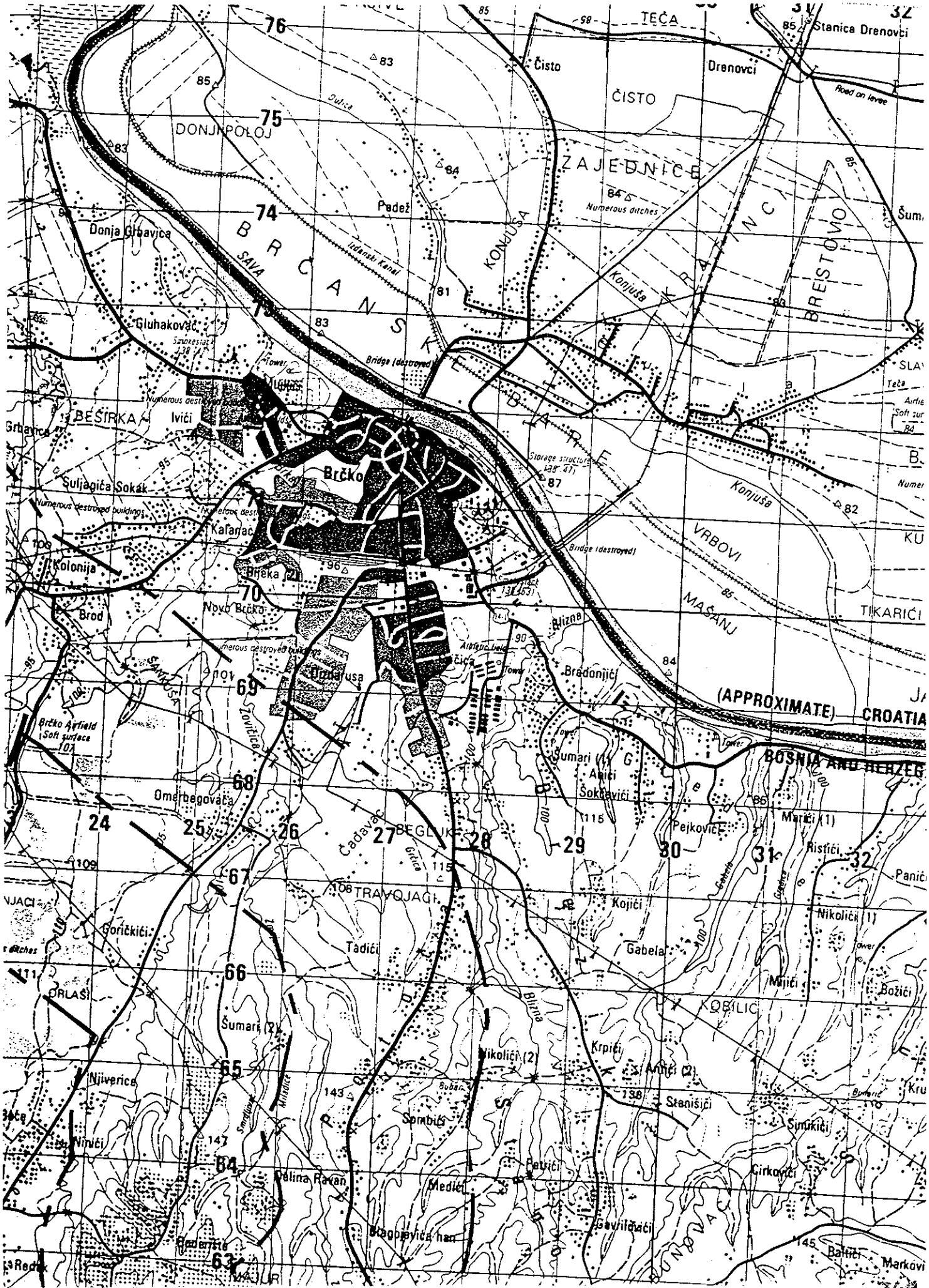
- The concrete portion of the bridge structure (from the Brcko direction) already has been finished. During the construction of the reinforced concrete columns a new area of earthen fill was formed, to the river's detriment. Construction of the steel bridge structure is in progress.

- The old steel bridge span is still lying in the river, which traps trees branches and other floating things. The river bed should be cleaned of this kind of debris in order to provide normal a flow and eliminate possible negative effects on the bridge structure.

- On the right side (from the access road to the site, from the center of Brcko direction along the bank of the Sava River) there is a disposal for sand which is being transported by boats, unloaded, loaded and transported to users. In fact, it is a reloading station which is empty at the moment. Some parts of the damaged steel bridge structure are disposed near this sand disposal. A part of this disposal area is bordered by deciduous trees.

- Deciduous trees, bushes, and grass cover were cut on the left side of the construction area. A warehouse for construction materials is located there, as well as site offices in containers; these areas are surrounded by a security fence. There is also some equipment for a water intake from the Sava River, which has been used by a meat refrigeration plant located near the bridge, on the left side of the access road. The refrigeration plant is out of service at the moment.

- The site was cleaned of garbage, except for down steel span and accumulated debris in the Sava River.


TEČA
Stanica Drenovci
Čisto
Drenovci
ČISTO
Road on levee
DONJI POLOJ
ZAJEDNICE
Padež
Donja Grbavica
SAVA
BRČANSKI
Ildanski Kanal
KONJUŠA
Konjuša
BREŠTOVO
Gluhakovač
Bridge (destroyed)
BEŠIRKA
Ivići
Grbavica
Brčko
Suljagića Sokak
Kafanac
Kolonija
Brijeka
Novo Brčko
Brod
Bridge (destroyed)
VRBOVI
MAŠANJ
TIKARIĆI
Blizna
Bradonjići
(APPROXIMATE)
CROATIA
BOSNIA AND HERZEG
Brčko Airfield (Soft surface)
Omerbegovača
Čadavac
BEGLUK
TRAVOJAĆI
Pejkovići
Ristići
Kojići
Nikolići (1)
Goričkići
Tadići
Gabela
Mujići
Božići
ORLAŠ
KOBILIĆ
Šumari (2)
Nikolići (2)
Krpići
Anići (2)
Stanišići
Sumkići
Njiverice
Sombići
Ninići
Pčelina Ravan
Medići
Petrići
Cirkovići
Gavrilovići
Bogojevića han
Bačinci
Markovi
Bijelište
Redžići
Blizna
Konjuša
Road on levee
Numerous ditches
Numerous destroyed buildings
Storage structure
Tower
Airfield
Soft surface
Bridge (destroyed)
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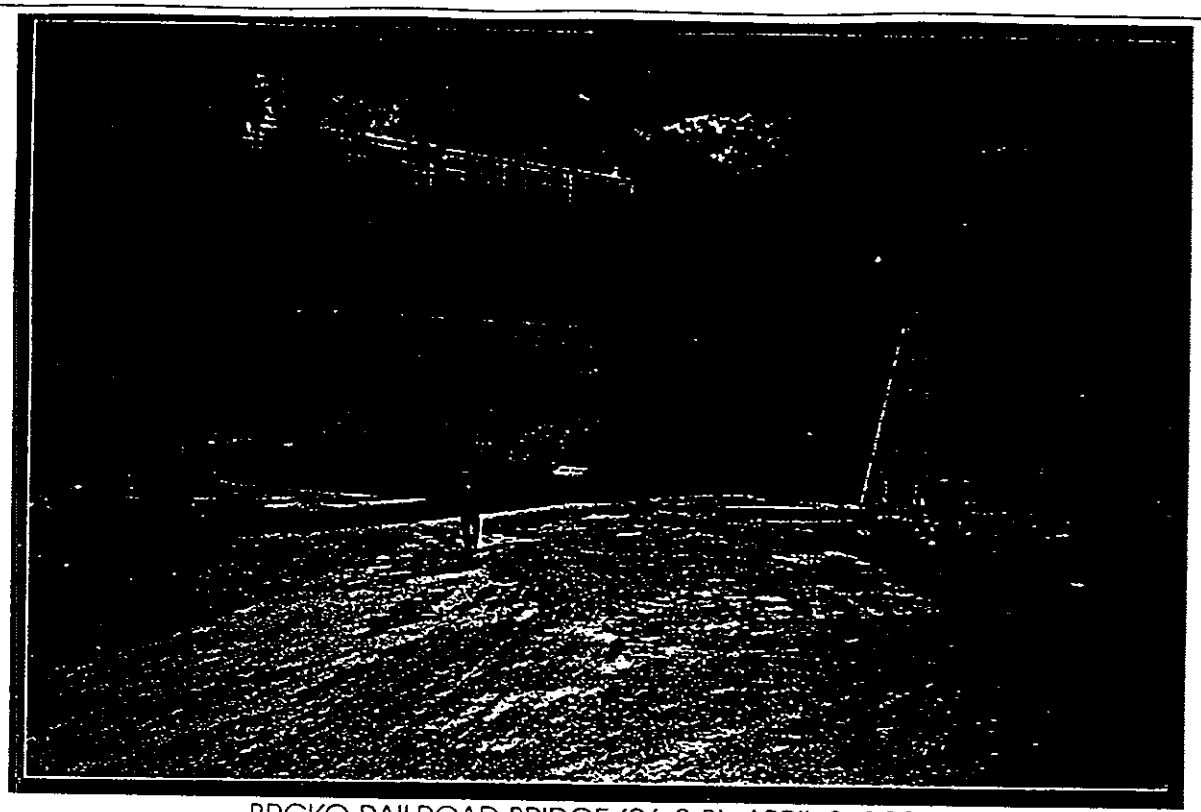

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BRCKO RAILROAD BRIDGE (96-2-B), APRIL 8, 1997

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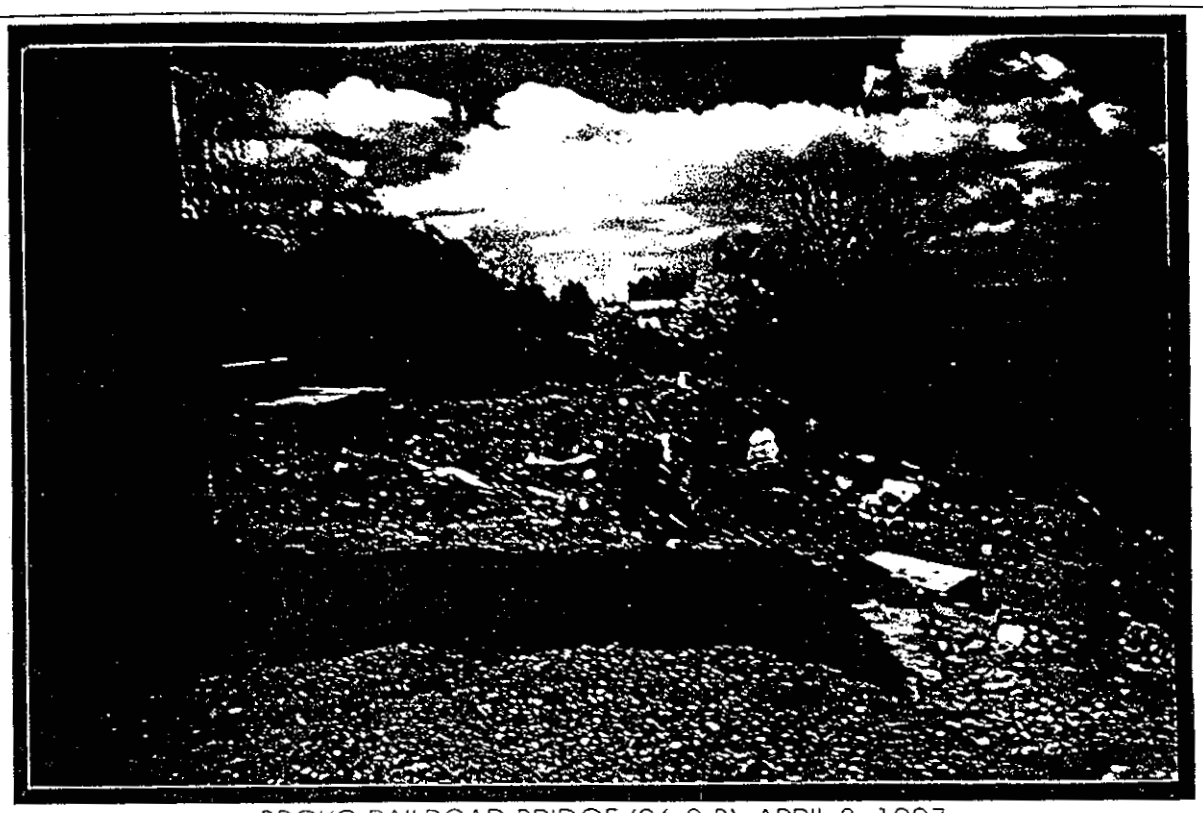


BRCKO RAILROAD BRIDGE (96-2-B), APRIL 8, 1997

BRCKO RAILROAD BRIDGE (96-2-B), APRIL 8, 1997

ENVIRONMENTAL ASSESSMENT CHECKLIST

96-5-A	OLOVO HEALTH CENTRE	HEALTH	OLOVO
Proj #	Proj Name	Sector	Jurisdiction

The purposes of this *Environmental Assessment Checklist (EA Checklist)* are to determine whether the proposed action (scope of work) encompasses the potential for environmental pollution or damage and, if so, to determine the scope and extent of additional environmental evaluation, mitigation, and monitoring necessary to fulfill federal U.S. environmental requirements. The *EA Checklist* is intended to be used in conjunction with a brief Project Description prepared by the Project Engineer and a *Baseline Environmental Survey* prepared for the CRMP process by the Environmental Engineer.

ENVIRONMENTAL CONSEQUENCES: (Check appropriate column as Yes (Y), Maybe (M), No (N), or Beneficial (B). Briefly explain Y, M, and B checks in next section, "Explanations")

		Y,M,N, or B?
1.	**Earth Resources**	
	a. grading, trenching, or excavation > 1.0 hectare	N
	b. geologic hazards (faults, landslides, liquefaction, unengineered fill, etc.)	N
	c. contaminated soils or ground water on the site	N
	d. offsite overburden/waste disposal or borrow pits required >1.0 ton	Y
	e. loss of high-quality farmlands >10 hectares	N
2.	**Air Quality**	
	a. substantial increase in onsite air pollutant emissions (construction/operation)	N
	b. violation of applicable air pollutant emissions or ambient concentration standards	N
	c. substantial increase in vehicle traffic during construction or operation	N
	d. demolition or blasting for construction	N
	e. substantial increase in odor during construction or operation	N
	f. substantial alteration of microclimate	N
3.	**Water Resources and Quality**	
	a. river, stream, or lake onsite or within 30 meters of construction	N
	b. withdrawals from or discharges to surface or ground waters	N
	c. excavation or placing of fill in, removing gravel from a river, stream, or lake	N
	d. onsite storage of liquid fuels or hazardous materials in bulk quantities	N
4.	**Cultural Resources**	
	a. prehistoric, historic, or paleontological resources w/i 30 meters of construction	N
	b. site/facility with unique cultural or ethnic values	N
5.	**Biological Resources**	
	a. vegetation removal or construction in wetlands or riparian areas >1.0 hectare	N
	b. use of pesticides/rodenticides, insecticides, or herbicides >1.0 hectare	N
	c. construction in or adjacent to a designated wildlife refuge	N
6.	**Planning and Land Use**	
	a. potential conflict with adjacent land uses	N
	b. non-compliance with existing codes, plans, permits, or design factors	N
	c. construction in national park or designated recreational area	N
	d. create substantially annoying source of light or glare	N
	e. relocation of >10 individuals for +6 months	N
	f. interrupt necessary utility or municipal service >10 individuals for +6 months	N
	g. substantial loss or inefficient use of mineral or non-renewable resources	N
	h. Increase existing noise levels >5 decibels for +3 months	N

222

7. **Traffic, Transportation, and Circulation**
   a. Increase vehicle trips >20% or cause substantial congestion — N
   b. Design features cause or contribute to safety hazards — N
   c. Inadequate access or emergency access for anticipated volume of people or traffic — N

8. **Hazards**
   a. substantially increase risk of fire, explosion, or hazardous chemical release — N
   b. bulk quantities of hazardous materials or fuels stored on site +3 months — N
   c. create or substantially contribute to human health hazard — M*

ENVIRONMENTAL CONSEQUENCES: explain Y, M, and B responses. Use back side of page or attach additional pages as necessary.

1. d) The Health Center in Olovo was damaged by war activities. Reconstruction will generate waste material (210m³) to be taken to the city dump.
The City dump is an unengineered, uncontrolled waste pile along Hwy 14 above the town (see photos).

8c. Construction wastes include lead, pipes and asbestos roofing materials which, if reused or improperly disposed, could have long-term effects on respiratory systems of exposed individuals, the number of which are unknown.

RECOMMENDED MITIGATION

1. ~~Lead and~~ Asbestos-containing wastes should be sealed in plastic, dispose of at (inside of) an approved municipal dump, and covered a layer of soil to prevent their reuse or disturbance.

RECOMMENDED ACTION:

(a) The Project has little or no potential for substantial adverse environmental effects, and no further environmental review is required. ✓
With the inclusion of the recommended mitigation measure.

(b) The Project has substantial but mitigable adverse environmental effects, and required measures to mitigate environmental effects will be included in the scope of work —

(c) The Project has substantial and unmitigable adverse environmental effects, or requires substantial additional analysis to form a conclusion, and an EA will be prepared. —

APPROVALS

Environmental Engineer: Bruce Campbell Date: 11/12/96

Project Engineer: Date: 11/18/96

Project Director: Date: 12/4/96

ENVIRONMENTAL BASELINE SURVEY

96-4-D-2	Grbavica School	Education	Novo Sarajevo
Project #	**Project Name**	**Sector**	**Jurisdiction**

Pre-Construction Conditions (Describe physical environment conditions on and near the site, taking note of native vegetation, surface waters, and nearby residential, recreational, or health care land uses. Identify possible environmental changes during construction. Attach a sketch and photographs of the project site and area. Use the back side of this form for additional space as needed.)

Reconstruction of the school includes: civil, craft, installation (electrical, water, sewage, heating) works. The school was damaged by war activities by stealing of property, and by lack of maintenance. The school is in the center of the city. An open school yard is located next to the Miljacka River. The eastern and western sides of the site are next to one of the city settlements. The entrance of the school is very close to the road. It is recommended to be very cautious during construction work because a number of mines have been found on the site.

The central heating pipes in the school were covered with asbestos cement for thermal protection.

Sfmd Nemanja — 10/15/96

Pre-Construction Survey by — **Date**

Recommendations (Specify areas to be avoided during construction; on-going environmental monitoring to be accomplished by contractor, project engineer, or environmental engineer; and any other measures during construction to minimize impacts on pre-existing environmental resources. Use back of page or additional pages as needed.):

1. The contractor should implement standard measures for construction worker protection.

2. The asbestos piping to be removed should be wrapped in plastic or otherwise sealed prior to disposal, and disposed at an approved municipal dump. Workers involved in handling the asbestos piping should be equipped with proper respiratory and skin protection, instructed about the potential hazards of friable asbestos materials

Bruce Campbell — 12/4/96 — 12/05/96

Senior Environmental Engineer — **Date** — **Project Engineer** — **Date**

Post-Construction Conditions (Follow instructions provided for pre-construction survey.):

MOST OF THE CONSTRUCTION DEBRIS FROM PHASE I OF THE RECONSTRUCTION HAS BEEN TAKEN TO THE CITY DUMP. SOME OF THE OLD METAL ROOFING REMOVED FROM THE SCHOOL DURING CONSTRUCTION AND TWO OLD CHAIRS HAVE BEEN LEFT ON THE SITE. THESE ITEMS SHOULD BE TAKEN TO THE DUMP.

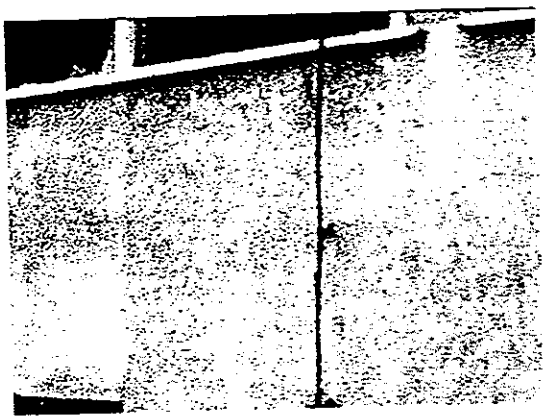
EXISTING DECIDUOUS AND CONIFEROUS TREES NEXT TO THE SCHOOL HAVE BEEN TRIMMED OF DEAD BRANCHES, AND THE HEDGE SURROUNDING THE SCHOOL HAS BEEN CUT TO ABOUT 30-40cm. THE SOIL AROUND THE SCHOOL, ESPECIALLY ON THE LEFT SIDE OF THE ENTRANCE, IS DEGRADED. THE GRASS AND TOPSOIL HAVE BEEN DAMAGED, AND THE TRACKS OF MECHANICAL EQUIPMENT ARE VISIBLE IN THE GRASS. EXCAVATION AND BACKFILLING FOR A NEW WATER SYSTEM CONNECTION PIPE AND MANHOLE HAVE LEFT AREAS OF BARE GROUND. DEAD VEGETATION WAS BURNED ON THE SITE, TO THE RIGHT SIDE OF THE SCHOOL ENTRANCE, AND THE GRASS IS THIS AREA WAS DAMAGED IN THE PROCES. THESE EXTERIOR AREAS SHOULD BE RE-LANDSCAPED AND THE LAWN SHOULD BE REESTABLISHED WITH RECONSTRUCTION IS FINISHE

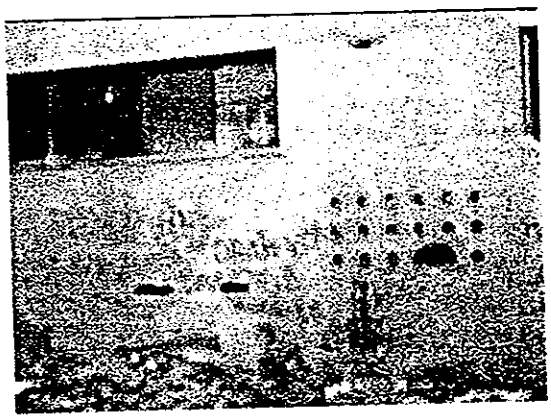
Sfmd Nemanja — 1/24/97

Post-Construction Survey By — **Date**

96-4-D-2 GREAVICA SCHOOL

96-4-D-2 GEBAVICA SCHOOL





15.10.96

ENVIRONMENTAL ASSESSMENT CHECKLIST
EAPS Macedonia
Stanica Zelenikovo Sewer System Project

I. PROJECT DESCRIPTION: The Municipality of Zelenikovo is a recently established municipality, located 30-km southeast of Skopje. The largest village in the municipality is Stanica Zelenikovo with 1200 inhabitants. This village is situated close to the Vardar River, and untreated wastewater from the village is polluting the ground water and the river. The project will construct a 3.5-km sewer network that will be connected to a wastewater treatment plant. The wastewater treatment plant will be constructed under a separate financing agreement. Implementation of this project in Stanica Zelenikovo will result in reduced pollution of the Vardar River.

II. ENVIRONMENTAL CONSEQUENCES: Check appropriate column as Yes (Y), Maybe (M), No (N) or Beneficial (B). Briefly explain Y, M and B checks in next Section, "Explanations". A "Y" response does not necessarily indicate a significant effect, but rather an issue that requires focused consideration,

	Y, M, N or B
1. Earth Resources	
a. grading, trenching, or excavation > 1.0 hectare	M
b. geologic hazards (faults, landslides, liquefaction, unengineered fill, etc.)	N
c. contaminated soils or ground water on the site	N
d. offsite overburden/waste disposal or borrow pits required > 1.0 ton	N
e. loss of high-quality farmlands > 10 hectares	N
2. Air Quality	
a. substantial increase in onsite air pollutant emissions (construction/operation)	N
b. violation of applicable air pollutant emissions or ambient concentration standards	N
c. substantial increase in vehicle traffic during construction or operation	N
d. Demolition or blasting for construction	N
e. substantial increase in odor during construction or operation	N
f. substantial alteration of microclimate	N
3. Water Resources and Quality	
a. river, stream or lake onsite or within 30 meters of construction	B
b. withdrawals from or discharges to surface or ground water	N
c. excavation or placing of fill, removing gravel from, a river, stream or lake	N
d. onsite storage of liquid fuels or hazardous materials in bulk quantities	N
4. Cultural Resources	

277

a. prehistoric, historic, or paleontological resources within 30 meters of construction _N_
b. site/facility with unique cultural or ethnic values _N_

5. **Biological Resources**
a. vegetation removal or construction in wetlands or riparian areas > 1.0 hectare _N_
b. use of pesticides/rodenticides, insecticides, or herbicides > 1.0 hectare _N_
c. Construction in or adjacent to a designated wildlife refuge _N_

6. **Planning and Land Use**
a. potential conflict with adjacent land uses _Y_
b. non-compliance with existing codes, plans, permits or design factors _N_
c. construction in national park or designated recreational area _N_
d. create substantially annoying source of light or glare _N_
e. relocation of >10 individuals for +6 months _N_
f. interrupt necessary utility or municipal service > 10 individuals for +6 months _N_
g. substantial loss of inefficient use of mineral or non-renewable resources _N_
h. increase existing noise levels >5 decibels for +3 months _N_

7. **Traffic, Transportation and Circulation**
a. increase vehicle trips >20% or cause substantial congestion _N_
b. design features cause or contribute to safety hazards _N_
inadequate access or emergency access for anticipated volume of people or traffic _N_

8. **Hazards**
a. substantially increase risk of fire, explosion, or hazardous chemical release _N_
b. bulk quantities of hazardous materials or fuels stored on site +3 months _N_
c. create or substantially contribute to human health hazard _N_

III. EXPLANATION: explain Y, M and B responses

1a: grading, trenching, or excavation > 1.0 hectare _M_

Construction of the sewer system requires trenching approximately 4,000 square meters of land, mostly village streets. The construction contract requires the contractor to refill the trenches and repave the streets, so there should be no significant negative environmental impact.

3a: river, stream or lake onsite or within 30 meters of construction _B_

The construction site is the Village of Stanica Zelenikovo, which is located near the Vardar River. A portion of the new sewage collection system will be within 30 meters of

278

the river. The sewer system will ultimately benefit the river, because it will prevent sewage from entering the groundwater and contaminating the river. There will be no negative impact on the river during construction, as contractors are required to dispose of debris at appropriate sites approved by the Macedonian authorities, as stated in the construction permit for the project.

6b: potential conflict with adjacent land uses _Y_

Construction of the sewer system requires trenching of privately owned land. Each of the private landowners involved has signed an agreement granting the municipality permission to complete the work, and will be compensated for the temporary use of the land.

IV. RECOMMENDED MITIGATION MEASURES

The Contractor will undertake following mitigation measures during the construction phase, which will be carefully monitored by EAPS project engineers through routine site visits:

1. Traffic control: The Contractor shall provide traffic control during the civil works on sewer trenches located alongside the road. The majority of construction work will occur along municipality roadways and control will be exercised to maintain the flow of traffic.
2. Safety:
   2.1. For the excavation works and trenches deeper than 1.2 m the Contractor shall secure soil stabilization through wooden supportive structures thus preventing cave-in.
   2.2. As a measure of public safety, barricades shall be secured along the side of open trenches.
3. Utilities: Location of utilities (electrical and telephone lines, water pipes) was incorporated into project documentation, and shall be verified by Contractor during project implementation.
4. Fuel storage: No fuel will be stored at the construction site.
5. Noise pollution: All the construction activities shall be done during daylight hours, and noise levels will not exceed normal background or permitted levels.
6. Construction Debris: the authority that issued the construction permit designated the disposal site for construction debris. The municipality will remove and dispose of debris in accordance with the designated plan.

V. RECOMMENDED ACTION (Check Appropriate Action):

Action (b) is recommended.

(a) The project has no potential for substantial adverse environmental effects. No further environmental review is required.

(b) The project has little potential for substantial adverse environmental effects, however the recommended mitigation measures (listed above) will be incorporated in the SOW. No further environmental review is required.
(c) The project has substantial but mitigatable adverse environmental effects and required measures to mitigate environmental effects (listed above) will be included in the SOW.
(d) The project has potentially substantial adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared.
(e) The project has potentially substantial adverse environmental effects and revisions to the project design or location or the development of new alternatives is required.
(f) The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

APPROVAL

Project Director _____

Date _____

780