

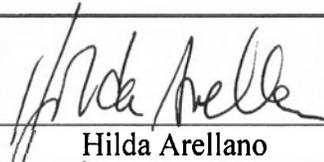
**SCOPING STATEMENT FOR CONSOLIDATED FIBER NETWORK  
(CFN) PROJECT PROGRAMMATIC ENVIRONMENTAL ASSESSMENT  
(PEA) STUDY**

**PROJECT INFORMATION**

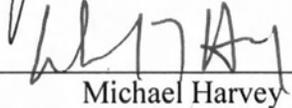
**Country Code-SO:** 266-001  
**SO Name:** Iraq Infrastructure Reconstruction Program  
**Country or Region:** Iraq  
**Activity Name:** Cable Fiber network (CFN) Project  
**Funding Begin:** January 15<sup>th</sup>, 2005    **Funding End:** June 30<sup>th</sup>, 2006 **Funding Amount:** \$ 54,680.00

**APPROVAL ISSUE: Scoping Statement**

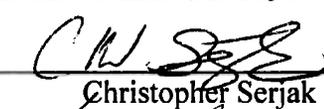
Mission Director:  
Approval

 Date: 10/1/06  
Hilda Arellano

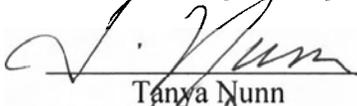
Mission Deputy Director:  
Approval

 Date: 10/01/06  
Michael Harvey

Infrastructure Advisor:  
Approval

 Date: 10/1/2006  
Christopher Serjak

Mission Legal Advisor:  
Approval

 Date: 10/1/06  
Tanya Nunn

Mission Environmental Officer:  
Approval:

 Date: 10-1-2006  
Ephantus Wahome

CONCURRENCE:  
Bureau Environmental Officer:

\_\_\_\_\_ Date: \_\_\_\_\_  
John Wilson  
Approval: \_\_\_\_\_  
Disapproval: \_\_\_\_\_

**Filenames:** Iraq Infrastructure Reconstruction Program IEE: Electric Power Systems Project

**File No:**  
**Distribution:**  
**Mission Environmental Officer**  
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**SCOPING STATEMENT**  
for the  
**PROGRAMMATIC ENVIRONMENTAL ASSESSMENT**  
of the  
**CONSOLIDATED FIBER NETWORK PROJECT**

**(JO 05-521)**

**in Cooperation with**

**THE GOVERNMENT OF IRAQ, MINISTRY OF COMMUNICATIONS  
AND  
MINISTRY OF ELECTRICITY**

## **INTRODUCTION**

In order to support the people and the Government of the Republic of Iraq, and to improve the communications system in Iraq, the United States Agency for International Development (USAID) proposes to finance a project to construct a Consolidated Fiber Network (CFN) linking components of the electrical and communication sectors across the country of Iraq.

The proposed CFN Project would benefit Iraq by creating a modern, high-speed data and voice transmission network between infrastructure nodes. The CFN Project would be constructed using existing fiber-optic backbone elements, providing additions and upgrades to the backbone where required, as well as providing new communications links connecting individual infrastructure sites and/or networks to the main fiber-optic backbone.

Twenty-two CFR 216.2.(a) (Scope), states that except as provided in Sec. 216.2(b), USAID's environmental procedures apply to all new projects, programs or activities authorized or approved by USAID and to substantive amendments or extensions of ongoing projects, programs, or activities.

Twenty-two CFR 216.2(d)(1)(vii, ix, and x) of the USAID Environmental Procedures identifies penetration road building or road improvements, power plants, and industrial plants as classes of actions that have been determined generally to have a significant effect on the environment. Constructing a consolidated fiber network throughout Iraq along roads with connections to power plants and industrial plants would require road improvements. This provision further provides that an Environmental Assessment (EA) or Environmental Impact Statement, as appropriate, is required. An EA is a detailed study of a proposed action to determine if there are any reasonably foreseeable significant impacts, beneficial or adverse. As outlined in 22 CFR 216.6(a), EAs provide USAID and the host country decision makers with a full discussion of significant environmental effects of a proposed action. It includes alternatives that would avoid or minimize adverse effects or alternatives that would 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 or resources.

The first step in this process is the preparation of a Scoping Statement which is a document used to anticipate potentially significant issues, issues that are potentially not significant, and to determine how and by whom the study will be conducted. The purpose of this Scoping Statement is to set forth clear understandings among USAID, the Ministry of Communication, the Ministry of Electricity, and the Government of the Republic of Iraq with respect to these issues for this project.

## **BACKGROUND**

The Bureau Environmental Officer (BEO) for USAID's Asia Near East (ANE) bureau concurred with the recommendations contained in a Programmatic Initial Environmental Examination (PIEE) of the Iraq Infrastructure Reconstruction Program in February 2004. The

recommendations of the PIEE were that all projects would be assessed using an environmental checklist. This PIEE anticipated a finding of a positive determination for activities that involve major construction activities or new water management projects, and suggested the need for an EA for such activities.

The CFN Project could alter significant portions of existing and/or currently under construction fiber-optic backbone network with additional sections being added as necessary to complete the backbone connectivity to those regions initially selected for service implementation. The regions identified are as follows: the Southern Euphrates; the Southern Tigris; Central (Baghdad); and North Iraq (around Zakho, Kirkuk, and Sulalmanlya). Connectivity from individual infrastructure sites to the CFN backbone would be provided and would utilize a combination of communication technologies. Existing infrastructure resources, such as, power lines and communications towers would be utilized to the extent practical for the installation of new fiber, in lieu of new below ground work. The estimated cost of this project is approximately \$51.9 million.

The scope of work for this project would include a site security assessment, operation/maintenance training, and fiber optic network management training. The proposed project is expected to employ approximately 1,000 Iraqi people through the use of local subcontractors.

## **DIRECT, INDIRECT AND CUMULATIVE POTENTIALLY SIGNIFICANT EFFECTS**

### **1) NOISE**

Scope – Heavy equipment used for excavation would be the major source for noise. This is a concern for local residents and construction workers in the immediate vicinity of work being performed and members of the local community. Strict silencer standards are needed and silencers must be used on all equipment and kept in a well-maintained state.

Significance – Population density around the proposed work sites is considered to moderate. Noise levels should not exceed 55 dBA for residential and 70 dBA for industrial areas during daylight hours. Best Management Practices (BMP) and appropriate Personal Protective Equipment will be required to protect site personnel.

### **2) AIR QUALITY AND DUST CONTROL**

Scope – Degraded air quality (notably elemental carbon, silica dust, hydrocarbons, smoke, other carcinogens, and other noxious fumes and gases) is likely to occur during construction from heavy equipment emissions and fugitive dust generation. Dust can easily be transported by strong winds, especially during the summer months. Construction workers could contract respiratory illnesses from exposure to heavy amounts of dust.

Significance - This would be a high priority of management during construction but would cease to be an issue once construction is complete. Wet dust control methods should be used during

construction and dusk masks should be worn to by site personnel as warranted by site conditions. Fugitive dust will be minimized to the greatest extent practicable by the contractor.

### **3) EROSION CONTROL**

Scope – Some soil erosion will occur during excavations, which disturb vegetative or other cover (e.g. asphalt or road bases). Stockpiled soils are more susceptible to erosion from wind and rainfall and would require special handling. It is not anticipated that soils would be stockpiled for extended period of time.

Significance – Significant erosion of surface soils is not anticipated. Working within site limits, utilizing approved waste removal, temporary/permanent stripping and stockpiling methods, maintaining drainage patterns, and following BMP will minimize erosion.

### **4) ENVIRONMENTALLY SENSITIVE AREAS**

Scope – Final CFN routes have not been determined so crossing environmentally sensitive areas is a possibility. Environmentally sensitive areas are areas that provide a significant function (e.g. riparian areas, wetlands including marsh, or endangered species habitats) or contain cultural artifacts or ruins. Construction could also be in close proximity to culturally sensitive areas (e.g. mosques, shrines, or other holy sites).

Significance – Encountering environmentally sensitive areas is not anticipated. Site assessments and proper planning will avoid these areas to the maximum extent practicable. Methods used to avoid impacts include working only in the minimum area required or creating buffers; repair/prevention of significant rutting by vehicles; and immediately responding to hazardous material spills. Project personnel would be frequently reminded to be culturally sensitive and aware of potential environmental conflicts while completing construction activities.

### **5) HAZARDOUS MATERIALS**

Scope - Proper management of the various types of potentially hazardous materials and/or waste (i.e. chemicals, lubricating oils, fuel oil, and diesel fuel) generated during construction activities is a serious concern. Hydrocarbon spills from heavy equipment, during refueling operations, or due to general mishandling of potential hazardous material is likely to occur considering the practices of the work force and the overall low concern regarding contamination in Iraq.

Significance - Hazardous Material Management Procedures (HMMP) will be implemented according to BMP. Subcontractors will provide a Hazardous Material Inventory list onsite and will be responsible for proper management (e.g., transportation, storage, handling, use, and disposal) of their hazardous materials in accordance with the HMMP.

### **6) DEBRIS CLEANUP & RESTORATION**

Scope - This construction project is expected to generate significant amounts of non-hazardous debris in the form of sediment, concrete, building debris, and miscellaneous construction related materials. A site-specific authorization should be obtained from the Government of the Republic

of Iraq to allow disposal in a sanitary landfill or other appropriate location following material recognition and hazard identification.

Significance - If not properly managed, waste and debris could cause negative environmental and aesthetic impacts. The contractor would clean up and remove construction materials and debris, and restore surfaces and sub surfaces to pre-existing conditions utilizing BMPs.

## **7) WORKER HEALTH, SAFETY, AND TRAINING**

Scope – Workers must be provided with the knowledge of the materials they are handling, an active safety program, and appropriate safety equipment including gloves, steel-toed boots, non-permeable coveralls, safety helmets, protective masks, and hearing protection devices.

Significance – This is extremely significant and must be the first priority of site management.

## **8) TRANSPORTATION**

Scope – The use of public roadways and railways would be necessary for the transportation of construction personnel, materials, and equipment. Material transportation routes would be selected based upon; equipment accessibility, existing traffic patterns, noise restrictions, logistics, distance, cost, and safety.

Significance – Routes would be avoided that could adversely affect sensitive areas to the maximum extent practicable. Movements in these areas would be restricted to the extent practicable to completing the job.

## **ISSUES THAT ARE POTENTIALLY NOT SIGNIFICANT**

### **1) THREATENED AND ENDANGERED SPECIES**

Scope – The CFN sites are around towns and cities with moderate populations. The sites should not pose any impacts to any habitat for any species listed on the International Union for the Conservation of Nature database that are critically threatened, threatened, vulnerable, or endangered.

Significance – This issue is not significant for the proposed construction sites, since many are near developed communities or are near disturbed areas, such as roads or power line right of ways.

## **2) GEOLOGY, SOILS AND SLOPE STABILITY**

Scope – The geology of the site would be investigated prior to site acceptance. The soil type could be significant if it contains silica dust, which can cause silicosis if absorbed into the lungs.

Significance – These issues are primarily design issues, and if effectively treated in the plan and design, are believed to be not significant.

## **3) UNEXPLODED ORDNANCES**

Scope – All sites must be cleared of unexploded ordnances (UXO) before any other work can begin.

Significance – This item is not significant once any UXOs are cleared at the beginning of the project.

## **TIMING OF PREPARATION OF ENVIRONMENTAL ANALYSIS**

It is anticipated that the Scoping Statement document will be completed in Baghdad by August 26 and forwarded to the ANE BEO for circulation. The Scoping Statement document will be circulated by the Mission Environmental Officer (MEO) to the Ministry of the Environment, Ministry of Communication, Ministry of Electricity, Ministry of Transportation, and interested in-country NGOs concurrently with circulation to other federal agencies as deemed appropriate by the ANE BEO. The comment period provided by REG 16 is 30 days. EA preparation can commence and the work progress pending BEO approval of the Scoping Statement document. Comments received following circulation can be incorporated in the final Scoping Statement document. Following the receipt in September of comments on the Scoping Statement, the EA team can perform any additional studies necessary and prepare the final project design and the design of the monitoring and mitigation plan. The EA can be submitted by October 2005 to the BEO and final approval can be obtained before the end of October 2005.

## **VARIATIONS IN THE FORMAT OF PEA**

No variations in the format of this PEA are needed at this time nor is it anticipated that any variations will be needed at a later time.

## **SCHEDULE OF PLANNING AND DECISION MAKING**

August 26 – Draft Scoping Statement sent to BEO and is circulated in country for comment.

August 27 – BEO sets up Washington based EA review team.

August 26 – Draft EA preparations begin.

September 28 – Final Scoping Statement prepared and forwarded to BEO with a ROD for execution.

October 1 – Draft EA prepared and sent to BEO and circulated in country for comment.

October 16 – final EA prepared and sent to BEO with a ROD for execution

## **DESCRIPTION OF HOW ANALYSIS WILL BE CONDUCTED**

The analysis will be conducted in Baghdad through individual contributions of the team members with periodic ad-hoc meetings to coordinate the study of significant issues and track the progress of the work.

## **DISCIPLINES THAT WILL PARTICIPATE IN THE ANALYSIS**

### **1) CORE TEAM**

1. USAID Mission Environmental Officer – John Pennell, USAID
2. Environmental Team Leader – Gib Owen, US Army Corps of Engineers
3. Biologist – Laura Lee Wilkinson, US Army Corps of Engineers
4. Biologist - Fadiya Fahim – USAID
5. Telecommunications Sector Manager – Rod Whiting, US Army Corps of Engineers
6. Telecommunications Sector Manager – Dick Dumford, USAID
7. Technical Review – Bob Martinson, US Army Corps of Engineers

### **2) POTENTIAL AGENCY REVIEWERS**

1. Government of Iraq, Ministry of Environment
2. Government of Iraq, Ministry of Communications
3. Government of Iraq, Ministry of Electricity
4. Government of Iraq, Ministry of Transportation

## COMMENT LETTER RECEIVED FROM MINISTRY OF THE ENVIRONMENT

Comment letter received from Ministry of the Environment, 2 October 2005. No response required.



Dear Mr. Owen,

With reference to your letter dated 26<sup>th</sup> August, 2005, requesting the Ministry's comments regarding the Draft Environmental Scoping Statement (ESS) for the Consolodated Fiber Network Project, we would like to state the following:-

The Ministry of Environment has no objection to implement the project, provided the concerned parties adhere to the requirements stated in the statement in addition to the following requirements:

- 1- the noise levels should not exceed 55 dBA in the residential areas and 70 dBA in the industrial areas, if the levels exceed these levels workers must be provided with the necessary safety equipment.
- 2- Provision of gas masks for the workers for protection against air pollutants.
- 3- Disposal of the solid waste generated from the excavation in the landfills.
- 4- Maintaning areas with certain speciality such as marshlands, green areas, mosques...etc.
- 5- Cleaning the site of any chemical and solid materials after implemetation.

Please accept the assurances of my highest consideration.

Yours sincerely,

  
Tuama A. Helou  
Acting Deputy Minister  
October, 12, 2005

Mr. Gih Owen  
Environmental Compliance Manager  
U.S. Army Corps of Engineers  
USAID Project Office, Baghdad