Office of Afghanistan & Pakistan Affairs (OAPA)

INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA

<table>
<thead>
<tr>
<th>Country Code:</th>
<th>306</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Area:</td>
<td>Higher Education</td>
</tr>
<tr>
<td>Country or Region:</td>
<td>Afghanistan</td>
</tr>
<tr>
<td>Activity Name:</td>
<td>Strengthening Tertiary Education Project-University Partnerships (STEP-UP)</td>
</tr>
<tr>
<td>Funding Period:</td>
<td>9/1/2013 – 8/31/2018</td>
</tr>
<tr>
<td>Amount:</td>
<td>$132.7 million</td>
</tr>
<tr>
<td>IEE Prepared by:</td>
<td>Cynthia Taha</td>
</tr>
<tr>
<td>Date:</td>
<td>March 19, 2013</td>
</tr>
<tr>
<td>Amended IEE (YES/NO):</td>
<td>No (but some activities under a sub-component were covered by a previous IEE for AUAF, tracking # OAPA-11-APR-AFG-0021)</td>
</tr>
</tbody>
</table>

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

<table>
<thead>
<tr>
<th>Categorical Exclusion:</th>
<th>☒ Deferral:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Positive Determination:</td>
<td>☐ Negative Determination:</td>
</tr>
<tr>
<td>Negative Determination with Conditions:</td>
<td>☒ Exemption:</td>
</tr>
</tbody>
</table>

1. PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose and Scope of IEE

The purpose of this IEE is to determine the environmental action categories for the new higher education project called Strengthening Tertiary Education Project-University Partnerships (STEP-UP). The recommended action is for a categorical exclusion for the technical assistance activities, entailing training and document production, and a negative determination with conditions for possible activities undertaken by the universities under the small grants component.

1.2 Background of STEP-UP:

The STEP-UP project will strive to improve the quality and relevance of the higher education system to support economic growth. The program supports the goals of the Afghan Ministry of Higher Education (MOHE) as stated in the Afghanistan National Development Strategy.
(ANDS), NHESP, and the National Priority Program Three (NPP 3), by contributing to increased employment of university graduates through capacity building at the MOHE and university levels and through developing high quality tertiary education programs that prepare graduates with the knowledge, skills, and qualifications to support the needs of modern business, industry, and government.

STEP-UP will also continue technical support to the American University of Afghanistan (AUAF), a private, independent university offering a U.S.-style curriculum. Under the STEP-UP program, AUAF will be award follow-on assistance to provide high quality courses and programs that are market-driven and within the high demand professions of the public and private sectors. To promote sustainability the follow-on award will also focus on AUAF’s accreditation in the U.S., which assures the quality standards are equal to other American universities. To improve AUAF’s financial independence it will increase income generation by offering more courses through the Professional Development Institute (PDI); collecting increased tuition fees; and increasing fund-raising activities.

1.3 Proposed Interventions:

The STEP-UP program has two components: one to build the capacity of the MOHE and the second to provide material and/or technical support to up to ten public universities and one private university. The activities include:

**Component 1: Provide technical assistance and training to the MOHE.**

1. Facilitate capacity building in the MOHE and universities to create more effective governance, management and financial control systems, including monitoring and evaluation;

2. Assist the MOHE and universities to implement quality assurance and accreditation guidelines, and curriculum standards for public and private universities;

**Component 2: Provide technical assistance and material support to selected universities**

1. Develop and pilot market-driven technical and professional associate degree programs designed in partnership with American and regional universities, the private and public sectors, and with consideration to women’s access to professional employment;

2. Small grants for equipment and refurbishments that support these programs;

3. Create university Career and Partnership Centers linked to the public and private sector, providing services such as internships, job search skills as well as employment placements.

4. Support to AUAF to develop high quality courses and programs that are market-driven and within the high demand professions of the public and private sectors, and to assist with accreditation in the U.S.
Only one of the proposed STEP-UP activities is expected to cause environmental impacts. Small grants to the universities under the second component could have some slight impact caused by minor refurbishment of university libraries and/or laboratories before installing academic or scientific equipment such as computers or laboratory apparatus.

2.0 RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

Categorical Exclusions [96.2% of the project budget ($127.7m)]:

Per 22 CFR 216.2 (c)(2)(i) and (iii), we recommend categorical exclusions for the following activities as they are not expected to have adverse environmental impact on the natural or physical environment of Afghanistan (Table 1 below).

- Component 1: technical assistance to the MOHE
- Component 2: technical assistance to the selected public universities (including $40 million for AUAF);

Negative Determinations with Conditions [3.8% of the project budget ($5m)]:

For small repairs and refurbishments of classrooms and laboratories, the implementer of the STEP-UP project shall provide evidence through regular progress reports that best practices have been adhered and that guidelines in Chapter 3 of Small-Scale Construction of the Environmental Guidelines for Small-Scale Activities in Africa (EGSSA), have been followed.

For equipment procurement, the implementer shall provide evidence that equipment and materials procured will be used in a safe way and that the implementer shall follow all national and provincial environmental laws and regulations, and that after the equipment has completed its useful life, it shall be either returned to the supplier for safe and sound disposal, or disposed of by Government of Afghanistan agencies and/or by the implementer in accordance with relevant legislation and/or USAID rules and regulations.

Table 1. Proposed program activities and recommended threshold decisions

<table>
<thead>
<tr>
<th>Component</th>
<th>Activities</th>
<th>Potential Impacts</th>
<th>22 CFR 216 Environmental Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component 1</td>
<td>Technical assistance to MOHE</td>
<td>None</td>
<td>§216.2(c)(2)(i): Education, technical assistance, or training programs: No mitigation required</td>
</tr>
<tr>
<td>Provide technical assistance and training to the MOHE</td>
<td>Workshops and Meetings</td>
<td>None</td>
<td>§216.2(c)(2)(iii): Analyses, studies, academic or research workshops and meetings: No mitigation required</td>
</tr>
</tbody>
</table>

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<th>Activities</th>
<th>Potential Impacts</th>
<th>22 CFR 216 Environmental Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Component 2</td>
<td>Technical assistance to the selected public universities</td>
<td>None</td>
<td>§216.2(c)(2)(i): Education, technical assistance, or training programs: No mitigation required</td>
</tr>
<tr>
<td></td>
<td>Development of market-driven academic programs, including programs at AUAF</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Accreditation of AUAF</td>
<td></td>
<td></td>
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<td></td>
<td>Salary support for expatriate staff, security support at AUAF</td>
<td></td>
<td></td>
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<tr>
<td>Component 2</td>
<td>Minor refurbishing of libraries, laboratories or classrooms and purchase of equipment such as computers, learning materials and laboratory apparatus</td>
<td>Limited impact if conditions are adhered to</td>
<td>Negative Determination with Conditions:</td>
</tr>
<tr>
<td></td>
<td>NOTE: No construction will take place</td>
<td></td>
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</tbody>
</table>

**Equipment:** Implementer shall provide evidence that equipment and materials procured will be used in a safe way and that the implementer shall follow all national and provincial environmental laws and regulations, and that after the equipment has completed its useful life, it shall be either returned to the supplier for safe and sound disposal, or disposed of by Government of Afghanistan agencies and/or by the implementer in accordance with relevant legislation and/or USAID rules and regulations.

**Refurbishments:** The implementing partner must provide evidence through regular progress reports that best practices have been followed, e.g. following Chap. 3: Small-Scale Construction of the Environmental...
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Procurement or use of Asbestos and Lead Containing Materials (ALCM) (e.g., piping, roofing), Polychlorinated Biphenyl’s (PCB) or other hazardous materials is prohibited by US EPA as provided at: [http://www.epa.gov/asbestos](http://www.epa.gov/asbestos) and/or under international environmental agreements and conventions, e.g., Stockholm Convention on Persistent Organic Pollutants as provided at: [http://chm.pops.int](http://chm.pops.int)

**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,” or if additional activities are proposed that might be considered “major” and their effects significant, this IEE will be reviewed and revised by the originator of the project and submitted to the Bureau Environmental Officer (BEO) for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID Agreement Officer’s Representative (AOR) to keep the Mission Environmental Officer and the BEO informed of any new information or changes in the activity that might require revision of the IEE.
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

Strengthening Tertiary Education Project-University Partnerships (STEP-UP)

Clearances:

Education Team Leader,  
David A. Bruns  
3/20/2013

Mission Environmental Officer Approval  
Harry Bottenberg  
3/20/2013

Regional Legal Advisor  
Ying Hsu  
3/20/13

Regional Environmental Advisor, Asia, Middle East & OAPA  
Andrei Barannik  
3/20/2013

Acting Deputy Mission Director  
Peter Duffy  
3/25/13

Acting Mission Director  
James I. Stein  
3/25/13

Approval:  
Bureau Environmental Officer/OAPA  
Gordon Weynand  
3/25/13

DISTRIBUTION: Project files, MEO Tracking, RLA and OAA
Hi Andrei, here is a light [light] IEE for your review. It is light because the Conditions apply to refurbishment and equipment purchase only (total of ca. 5% of funds) and to simplify the requirements I am not requesting an EMMP or ERF/ERR. They only need to state in their regular progress reporting what they have done and that they followed best practices. I added the lead and asbestos limitation in the Conditions (Table 1). What do you think?

harry

---- Original Message ----
From: Bottenberg, Harry [mailto:HBottenberg@state.gov]
Sent: Tuesday, March 19, 2013 05:20 AM
To: Barannik, Andrei (USAID/CAR/SPO) <abarannik@usaid.gov>
Subject: FW: Draft IEE for STEP-UP

Hi Andrei, here is a light IEE for your review. It is light because the Conditions apply to refurbishment and equipment purchase only (total of ca. 5% of funds) and to simplify the requirements I am not requesting an EMMP or ERF/ERR. They only need to state in their regular progress reporting what they have done and that they followed best practices. I added the lead and asbestos limitation in the Conditions (Table 1). What do you think?

harry

Harry Bottenberg, Ph.D.
Mission Environmental Officer
USAID Afghanistan, Kabul
tel: 1-301-490-1042, ext. 4940
cell: +93-(0)700-046-406

From: Bottenberg, Harry
Sent: Tuesday, March 19, 2013 12:15 PM
To: Taha, Cynthia
Cc: Chipili, Melissa; Najib, Najibullah; Bruns, David A
Subject: RE: Draft IEE for STEP-UP

Hi Cynthia,