ENVIRONMENTAL THRESHOLD DECISION

Activity Location: Jamaica

Activity Title: Caribbean Basin Security Initiative (CBSI) Program and the DGP Transitional Living Program for Children in State Care Project.

Activity Number: TBD

Life-of-Activity Funding: $18,388,521

Life-of-Activity: FY 2013 – FY 2018

IEE prepared by: Claudette Anglin, Development Grants Program (DGP) Coordinator (Activity Manager)

Reference ETDs: LAC-IEE-13-21

Recommended Threshold Decision: Categorical Exclusion
Negative Determination with Conditions

Bureau Threshold Decision: Categorical Exclusion
Negative Determination with Conditions

Comments:

This Environmental Threshold Decision amends LAC-IEE-13-21, which covers the entire Caribbean Basin Security Initiative Program, to add the USAID Development Grants Program (DGP) Transitional Living Program for children in State Care activity, including additional life-of-activity funds.

A Categorical Exclusion continues to be issued to the Caribbean Basin Security Initiative (CBSI) Program except for the activities listed below, pursuant to 22 CFR 216.2 (c)(2):
(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.);

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

(v) Document and information transfers; and

(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.);

A Negative Determination with Conditions is issued to the Caribbean Basin Security Initiative (CBSI) Program for the following activities:

- Component 1, Activity 1: Small grants to provide support for community-based organizations and, Establishment of a competitive small grants program for communities and civil society organizations; Community Pilot Project activities TBD.

- Component 1, Activity 2: Support and strengthen legitimate local governance structures including CBOs and CDCs, Retrofitting community disaster shelters and equipping them with rainwater harvesting systems and renewable energy systems to supply “off-grid” power which may require small-scale construction.

- **Component 1, Activity 3**: Supporting youth empowerment in communities and creating youth-centered spaces and activities. Mitigation measures will be implemented and monitored for the renovation or the small-scale construction of the residential housing facility, which may have minor adverse environmental impacts.

- Component 3: Encourage alternative sentence (to jail) programs for juveniles, Activity 3: Reintegration and Rehabilitation: Under DGP-5, the UWI/CCDC’s “Transitional Living Programme for Children in State Care”

- Component 4, Activity 1. Continue support for the national roll-out of community-based policing Community Pilot Project activities TBD.

Conditions include the following:

- The implementer will be required to complete an EMPR for any Negative Determination with Conditions activities listed in Section 3.1 of this IEE to identify any potential negative impacts, identify appropriate mitigation measures, and ensure that monitoring of the mitigation measures implementation and effectiveness is completed. In addition, the Implementing Partners shall apply the following mitigation measures to ensure that environmental concerns are taken into account during both the design and implementation of the project activities:
Implementing partner(s) shall follow environmental best practices in construction for small scale infrastructure activities, such as the disaster shelter rehabilitation project under Component 1 as well as other activities that may take place under the community pilot projects or small grants program. These best practices include minimizing the amount of environmental degradation and disturbance to land, water, and other resources due to soil compacting and grading, sedimentation, water contamination, displacement of local populations (human, plant, and animal) and habitats, and damage to cultural sites, for example. Global climate change must also be considered and mitigation and adaptation measures incorporated whenever it is feasible.

A mitigation and monitoring plan (EMPR form) for the rainwater harvesting and renewable energy systems is presented in the attached table that may be incorporated into the work plan. Similar plans may be required for activities under the community pilot projects and small grants program that trigger the need for mitigation.

Mitigation activities will require the implementing partner(s) to assess the safest procedures feasible for construction, environmental and human health protection, and essential hygiene practices through adequate sanitization of products, safe disposal of materials, water purification and safe storage.

Implementing partner(s) will be required to follow the WHO’s guidelines for safe disposal of human waste and trash, environmental sanitation and safe water found at: http://www.who.int/water_sanitation_health. The implementer will be required to submit rainwater harvest and purification designs and renewable energy system plans to USAID/Jamaica for approval prior to construction of the prototype and adapted models.

Implementing partner staff and USAID will ensure that each activity uses environmentally sound principles and includes long-term operational and maintenance plans beyond the life of the program to help ensure that all activities have adequate buy-in and long-term sustainability (see Sustainability Analysis section).

USAID/Jamaica and/or the contractor shall consult with community leaders and organizations as well as law enforcement and other state entities to help assure that the proposed mitigation measures are realistic and likely to be followed.

Language in contracts and agreements should be included to ensure that the Contractor/Implementing Partner is aware of and implements required mitigations or other prescribed environmental management measures pertinent to Regulation 216. The specific language to be included in all contracts and agreements is outlined in the attached IEE.

Other conditions specified in the attached IEE under 3.2 Mitigation, Monitoring and Evaluation.

Responsibilities
planning, extraction, or commercialization of timber from primary and/or naturally managed forests, and one component of (sub) activity 3.3, establishment of 70 ha of agroforestry plots, managed within a productive system, according to their socio-cultural reality in 05 native communities and 06 villages in the project. AIDER shall prepare an Environmental Assessment (EA) pursuant to 22 CFR 216.6 and Section 118 (c) (14) and (15) of the Foreign Assistance Act prior to initiating such activities. AIDER shall also submit to USAID/Peru a copy of the scoping statement for approval to be used for the Environmental Assessment. USAID/Peru will provide guidance in the EA formulation process.

Additional Responsibilities:

- Each Agreement or Contract Officer’s Representative (A/COR), or activity manager as appropriate, is responsible for ensuring environmental conditions are met (USAID ADS 204.3.4). In addition, A/CORs are responsible for ensuring that appropriate environmental guidelines are followed, mitigation measures in the IEE/ETD are budgeted for and implemented, and that adequate monitoring and evaluation protocols are in place to ensure implementation of mitigation measures. Implementing Partners will have qualified environmental staff capable of overseeing the implementation of the environmental mitigation and monitoring plans and other environmental conditions under this activity.

- Language from “Environmental Compliance: Language for Use in Solicitations and Awards – An Additional Help for ADS Chapter 204” must be included, as appropriate, in award documents (see: http://www.usaid.gov/policy/ads/200/204sac.pdf). It is the responsibility of the Assistance Objective (AO) Team and/or Contracts/Agreements Officer to ensure that environmental compliance language from the ETD is added to procurement and obligating documents.

- Amendments to Initial Environmental Examinations (IEE) shall be submitted for LAC Bureau Environmental Officer (BEO) approval for any activities not specifically covered in the IEE, which include:
  o Funding level increase beyond ETD amount
  o Time period extension beyond ETD dates (even for no cost extensions)
  o A change in the technical scope of work or nature of activities, such as the use of pesticides or activities subject to Foreign Assistance Act sections 118 and 119 (e.g. procurement of logging equipment), among others, and/or
  o A change in the geographic scope of work (e.g. moving the project into a new geographic area) that could result in potentially negative environmental impacts not otherwise contemplated.

- Amendments to IEEs may include the need to do an Environmental Assessment(s) and approval of these documents by the LAC BEO could require an annual evaluation for environmental compliance.

- Under no circumstances will funds be used for (1) the procurement or use of pesticides or the purchase of equipment which could be used for commercial timber harvesting, or (2)
• Each activity manager or Contract/Agreement Officer Representative (COR/AOR) is responsible for making sure environmental conditions are met (ADS 204.3.4). In addition, COR/AORs are responsible for ensuring that appropriate environmental guidelines are followed, mitigation measures in the IEE are funded and implemented, and that adequate monitoring and evaluation protocols are in place to ensure implementation of mitigation measures.

• The Mission Environmental Officer will conduct spot checks to ensure that conditions in the IEE and this ETD are met. These evaluations will review whether guidelines are properly used to implement activities under this ETD in an environmentally sound and sustainable manner according to USAID and applicable U.S. Government policies and regulations.

• The implementing contractor or partner will ensure that all activities conducted under this instrument comply with this ETD. Also, through its regular reporting requirements, a section on environmental compliance (e.g. mitigation monitoring results) will be included.

Amendments

• Amendments to Initial Environmental Examinations (IEE) shall be submitted for LAC Bureau Environmental Officer (BEO) approval for any activities not specifically covered in the IEE, which include:
  o Funding level increase beyond ETD amount,
  o Time period extension beyond ETD dates (even for no cost extension), or
  o Additional activities or a change in the scope of work, such as the use of pesticides or activities subject to Foreign Assistance Act sections 118 and 119 (e.g. procurement of logging equipment), among others.

• Amendments to IEEs, including Environmental Assessments (EAs), require the approval of these documents by the LAC BEO, and could require an annual evaluation for environmental compliance.

Victor H. Bullen
Bureau Environmental Officer
Bureau for Latin America & the Caribbean

Date: 6-30-2014

Denise Herbol, USAID/Jamaica, Mission Director
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         Eric Kite, LAC/RSD
Copy to: IEE File

Attachments:
• Initial Environmental Examination

File: P:\LAC.RSD.PUB\RSDPUB\ENV\Reg 216\IEE\IEE14\LAC-IEE-14-37 ETD (JA - Caribbean Basin Security Initiative, CBSI, amend LAC-IEE-13-21).doc
INITIAL ENVIRONMENTAL EXAMINATION

Activity Location: Jamaica

Activity Title: Caribbean Basin Security Initiative (CBSI) Program and the DGP Transitional Living Program for Children in State Care Project.

Activity Number: [To be Assigned by Contracting Office]

Life-of-Activity Funding: $18,388,521

Life-of-Activity: FY 2013 – FY 2018

Reference Threshold Decision: This IEE amends LAC-IEE-13-21, the New USAID CBSI Program to include the DGP-5 “Transitional Living Program for Children in State Care” project to be implemented by the University of the West Indies/Caribbean Child Development Center (UWI/CCDC).

IEE Amendment Prepared by: Claudette Anglin, Development Grants Program (DGP) Coordinator (Activity Manager)

Date Prepared: Wednesday, March 12, 2014

Recommended Threshold Decision: Categorical Exclusion, Negative Determination with Conditions
1. Background and activity/program description

1.1 Purpose and Scope of IEE
This Initial Environmental Examination (IEE) is a requirement of USAID cited in the Automated Directives System (ADS 204.5.1). The purpose is to determine the impact of activities implemented by USAID/Jamaica’s “Caribbean Basin Security Initiative (CBSI) Program” and the Transitional Living Program for Children in State Care Project to ensure that they are in accordance with Section 117 of the Foreign Assistance Act (FAA) of 1961 as amended that “requires that USAID have appropriate environmental impact assessment procedures”. This IEE has been prepared in accordance with the guidelines set out in the United States Agency for International Development (USAID) Environmental Procedures (22 Code of Federal Regulations (CFR) 216). This IEE serves to amend LAC-IEE-13-21 that covers the entire Caribbean Basin Security Initiative Program to include the USAID Development Grants Program (DGP) Transitional Living Program for children in State care activity. This is based upon the direction in USAID/Jamaica’s new Country Development Cooperation Strategy (CDCS) for 2013-2018 and covers future activities including under the CBSI through 2018.

1.2 Background
It is undeniable that the increase in violence and crime in Jamaica has significantly impacted the high levels of insecurity being experienced in many communities across the island. While homicide rates have declined from a peak rate of 62 per 100,000 in 2005 to 53 per 100,000 in 2010, Jamaica ranks first in homicide rates and other violent crime in the Caribbean, and has historically sustained high homicide rates for over 20 years. Findings from the 2009 Victimization Survey indicated that a high percentage of citizens feel unsafe or very unsafe outside of their own homes and outside their communities. A high percentage of respondents to the survey indicate feeling unsafe conducting various day to day activities such as using public transport, going to school or work, shopping, or attending entertainment events after dark.

The criminal statistics show that both the perpetrators and victims of crimes are disproportionately youth between the ages of 14 and 25. The CARICOM Commission on Youth Development Report stated that among males aged 15-24, homicides were the leading cause of death (at 19.8%). However, increasingly violence has involved women, not only as victims of crimes by men, but also as perpetrators of violence against other women. The Economic and Social Survey of Jamaica indicates that women remain the primary victims of rape and domestic violence, and secondary victims of violence directly affecting young males.

According to the 2006 Roadmap to a Safe and Secure Jamaica, safety and security concerns in Jamaica is more prevalent in specific parishes and underserved urban areas, and is higher in areas where trust in the police and the broader state is lower. These neighbourhoods and communities have higher rates of poverty, unemployment, lower educational attainment, low social capital, poor housing stock, and low levels of investment in public spaces. Inequality and relative poverty provide a fertile ground for crime; and in turn, high levels of crime and violence interfere with human, social and economic development. The security situation, ineffective security governance and social development arrangements undermine Jamaica’s ability to establish and maintain a viable economy that can sustain acceptable levels of well-being for the majority of its citizens.
In addition general public distrust of the police, incidence of police corruption and abuse of citizen rights have created an uneasy distance between the police and citizens. This lack of confidence, trust and lack of legitimacy of the police force has important implications for their effectiveness, contributing to a sense of impunity from prosecution and exposing those most vulnerable to further victimization. The traditional style of para-military policing used in Jamaica for many years is not suitable to deliver modern policing and community safety services. According to a recent government review of policing in Jamaica, ‘The Report of the Jamaica Constabulary Force (JCF) Strategic Review Panel’, the security situation and the relative threat against the police have led to methods of policing that are “militaristic” and ineffective, and the police have been “slow to adopt a culture of public service, community-based policing and respect for human rights.”

To increase peace and security in Jamaica, both law enforcement itself and the community’s ability to work with police in addressing crime and violence must be enhanced. Crime and violence destroy communities from the inside by eroding interpersonal trust as well as trust between citizens and the institutions that are supposed to protect them. The National Crime Prevention and Community Safety Strategy (NCPCSS) postulates that crime and violence must be recognized as a broader social issue that goes beyond traditional law enforcement, and requires different prevention efforts and social interventions to effectively reduce crime and violence. Strong communities are critical to stemming the rising tide of crime and violence; community members must present a united front against delinquent behavior and provide help and opportunities to those at risk of engaging in delinquency, while working alongside the JCF. To generate the trust needed for viable partnerships between communities and the GOJ, greater transparency and accountability from institutions, including the JCF, are critical elements.

Youth ages 15-24 are both the largest group of perpetrators and primary victims of violent crimes. Thus, any efforts to stem the violence must focus on youth, not only because of their high level of involvement, but also because the future of any nation lies in the development of its youth into strong and productive citizens.

Activities will be closely coordinated with local partners in the JCF, the Social Development Commission (SDC), the Child Development Agency (CDA), as well as non-governmental organizations, civil society and community based organizations, the International Donor Partners and other U.S. Government sectors. The Contractor must be sufficiently flexible to respond to new requests and windows of opportunity, although any new activities must be approved by the USAID/Jamaica Contracting Officer Representative (COR).

Activities will include technical assistance and financial support for community-driven programs to build and promote safer communities, including encouraging youth to develop their full potential by providing educational and training opportunities, as well as other activities targeting some of the core underlying causes of crime (poverty, lack of opportunity, lack of self-esteem, poor parenting, etc.); support for key civil society institutions; technical assistance, training and support to foster a culture of lawfulness in several key sectors; technical assistance, training, and support to encourage diversion (to jail) programs for juveniles; and direct technical assistance and training to design/implement specific institutional changes in the JCF in support of
enhancing and fully institutionalizing CBP. Other activity includes the renovation or construction of a transitional residential facility to accommodate 40 female juveniles leaving State care with nowhere to live. The objective is to provide a stable living arrangement that will help them make the transition into adulthood and independent living through an exit-readiness program of life skills and workforce readiness training that address employability and lifestyle choices/health. The Contractor should seek to build the basis for longer-term and sustainable reforms by incorporating the following approaches into its programming:

- Empower local leaders and community organizations to take leadership in promoting and partaking in greater civic engagement;
- Enhance relationships and build confidence among key stakeholders, including police, community groups, civil society organizations, and key governmental institutions;
- Build consensus among key stakeholders and the general public on the need for a transparency and accountability in government in particular and society in general, and on the specific reforms needed to achieve it;
- Support key partners and stakeholders in juvenile diversion (to jail) programs; and
- Support of the JCF CBP program and to further entrench CBP at all levels of JCF training.

The project’s interventions will include trainings, workshops, and various extracurricular and cultural activities which gather groups of people together to achieve the project’s goals. Given these activities, it is recommended that implementing partners consult USAID’s Green Meeting Planning Checklist (IEE Annex 1 below) in order to reduce waste, conserve energy, support local producers, and improve short and long term sanitation of the meeting area.

The activities slated to be included under this program will not use any Genetically Modified Organisms (GMO) or pesticides. This activity does not promote invasive species.

1.3 Description of Activities

Component 1: Promote community-driven activities to contribute to Improved crime prevention, Intervention and enforcement by addressing underlying causes of crime and Promoting improved communications / interactions with police.

A clear lesson learned in Jamaica is that successful efforts must come from within rather than from the outside. Where communities themselves have been the driving force behind efforts to reduce crime and promote community safety, those efforts have been the most successful and sustainable. When community leadership and citizen participation in crime reduction programs exist, effective community / police partnerships can result in dramatic reductions in violence (as in Tredegar Park, cited in the COMET close out video and Report as well as the COMET evaluation, 2012). Further, the proposed National Crime Prevention and Community Safety Strategy places the community at the center of a multi-sectoral participatory framework to address safety challenges facing citizens.

The Assessment of Community Security and Transformation Programs in Jamaica 2009 found that the two most vital areas to address to improve community security are strengthening local governance and improving community policing. These two areas address issues of power, accountability and participation in communities. Because of their focus on increasing the
capacity to manage problems peacefully at the local level, community security is increased. Combining action in these two areas is crucial to replacing illegitimate authority with legitimate authority. This combination of security and governance interventions can act as a platform for social activities in all other areas and is vital for sustainability. Without improved policing and legitimate governance structures, progress made through other social interventions risks being reversed.  

This component seeks to promote and support community efforts through a variety of approaches: training and technical assistance to targeted communities and civil society organizations; a grants program to provide support to proposals generated by community groups, churches, NGOs and others to address a variety of issues related to addressing underlying causes of crime. This component will use GCC concepts as a catalyst upon which to improve secure livelihoods. It identifies disaster reduction programs as a priority in this regard. The undertaking of such activities will also lend itself to potential microenterprise endeavors that are crucial in addressing some of the underlying causes of crime and violence. For example, collaborative police-citizen projects to retrofit community shelters with water harvesting systems and clean energy sources (such as solar panels and biodigesters) to provide “off-grid” water, energy and cooking gas services after climate-related disasters (e.g. hurricanes). This component also gives due consideration to the efforts in component 1, which is aimed at rolling out community-based policing nationally.

In view of the fact that youth make up the overwhelming majority of both perpetrators and victims of crime, the contractor will undertake prevention activities addressing the following four groups: 1) youth living in disadvantaged situations who are at risk of dropping out of school or of being unemployed but who have not yet engaged in risky behavior; 2) youth who engage in risky behavior but have not yet suffered severe negative consequences – i.e. school problems and absences but still in school, involved in delinquent activities but not yet arrested; 3) youth experiencing serious negative consequences as a result of risky behavior (i.e. dropped out of school, joined violent gangs, been arrested); and victims of gender based violence.

This component is closely aligned to all three Sub Intermediate Results as dictated in Intermediate Result 2: “Cooperation between Communities and Law Enforcement increase”, “Violence in CRP Communities reduced”, and “Institutional Capacity of CBOs, NGOs and MDAs improved.”

Illustrative activities under this component include:

**Activity 1: Small grants to provide support for community-based organizations and community-based projects**

The development of a competitive small grants program will be used for communities and civil society organizations, including women’s organizations, and community based organizations, to build capacity and develop innovative, community specific responses to issues facing women and youth, in general, and youth-at-risk, in particular. This capacity building component will seek to train eligible community organizations in project design, monitoring and evaluation,

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1 Government of Jamaica, Assessment of Community Security and Transformation Programs, 2009
reporting and fund raising to secure future funding and ensure the sustainability of their activities, as well as in areas of leadership, advocacy and local governance participation.

The small grants activity is cross-cutting and is geared towards supporting all community-driven and culture of lawfulness activities under Components 1 and 2.

**Expected Results:**
- Greater support for community-driven crime prevention activities, with establishment of small grants program.
- Eligibility criteria and disbursement procedures in place for smooth administration of small grants to communities.

**Activity 2: Support and strengthen legitimate local governance structures including CBOs and CDCs.**

A key component in building safer communities is the presence of strong local governance. Law enforcement agents, social service providers, and citizens have generally agreed that the strengthening of Community Based Organizations (CBOs), such as Community Development Committees (CDCs), Youth Clubs/Groups, Neighborhood Watch Groups, and Faith Based Organizations (FBOs) have contributed to creating safer and more secure communities, particularly in improving the relationship between citizens and police. In the community of Flanker, for example, community members testify that improved community policing, which was facilitated by the Peace and Justice Centre, is one of the main reasons for the improved safety in the community.

The Assessment of Community Security and Transformation Programs in Jamaica 2009 recommends that increased support should be given to building the capacity of CDCs. All GOJ programs should work to strengthen one CDC as a coordinating body in each community. The legal status of CDCs should be strengthened as part of the local government reforms and enhancing their representation and outreach are important priorities. To realize this objective the project will establish Community Resource Centres (CRCs) through which CDCs will carry out its community development mandate. The CRCs will be constructed from retrofitted containers, and consistent with the Project’s GCC/DRR integration thrust be fully equipped with rainwater harvesting and solar energy systems.

The contractor will support such best practices through capacity building and technical assistance focused on improving participation in local governance and enhancing sustainability.

**Expected Results:**
- Increased participation of community members in crime prevention.
- Improved cooperation between the police and communities in addressing safety and security issues.

**Activity 3: Supporting youth empowerment in communities and creating youth-centered spaces and activities**

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2 Government of Jamaica, Assessment of Community Security and Transformation Programs, 2009
High levels of youth unemployment coupled with the lack of education and vocational skills have been identified as major “push” factors for youth engagement in criminal activity. The absence of youth friendly spaces for leisure, recreation, and meaningful youth engagement is also highlighted as having deleterious effects on youth attitudes and behavior. The contractor will work with the CBOs to identify and promote alternatives to criminal behaviors, such as recreational and sports activities, education, and job opportunities and training. This will work to enhance the community’s capacity to counter criminal influences on youth-at-risk.

The contractor will work with CBOs and community consultative groups such as CDCs to identify sports and recreational activities for youth. Illustrative activities include community football and netball competitions (corner league), performance and creative arts groups, marching band and cheerleading.

Basic education and vocational training to better equip youth to take advantage of existing and new employment opportunities should be carried out through educational partnerships with institutions (but not limited to) such as HEART/NTA and the Jamaica Foundation for Life Long Learning (JFLL). The contractor will work with local officials, communities, and others, as appropriate, in developing viable partnerships. The contractor will explore market-driven training opportunities to determine the most promising fields for new employment and will work to pursue training programs in those areas. Illustrative activities include micro-credit and micro-enterprise training, mentoring and partnership with private sector to place at-risk youth in apprenticeships and jobs.

Expected Results:
- Improved relations between the police and youth within communities.
- Increased certification for youth in specific skill areas.
- Increased leisure and recreational activities for youth.

Impact of Component 1 over Five Years:
- Increased youth participation in communities and society.
- Increased capacity and more sustainable CBOs.
- Significantly fewer youth engaged in violent and criminal activities.
- More robust and participatory community governance structures.

Component 2: Develop long-term champions of a culture of lawfulness through engaging multiple sectors of society in a common effort to develop a culture supportive of the rule of law.
Fostering good citizenship and a culture of lawfulness is vital to building communities strong and resilient enough to resist crime and violence. In order to sustain security gains and improvements in rule of law and institutional effectiveness, citizens must have a stake in society and a positive outlook for the future. A culture of lawfulness cannot be imposed from the outside; it requires local and national support, embedded in local institutions with the requisite human and financial capacity to maintain them.

A multi-sectoral culture of lawfulness program gives citizens the tools they need to know their rights and demand that they are respected; understand, appreciate, and follow the law; and
effectively collaborate with institutions, particularly local governments and security forces. To accomplish these goals, attention should be focused on youth, who are most at risk of engaging in destructive and unlawful behavior, yet also the most capable of learning to become good citizens. In addition to programs that work to keep youth in school longer and expand all forms of post-secondary training, a culture of lawfulness program, which teaches and provides complementary education to parents and others in the communities, will promote tolerance, appreciation of the law, and behavior that promotes community security.

The culture of lawfulness program has national as well as local aspects. Campaigns targeting communities and the police will be launched at a national level, but more focused efforts will be made in selected communities. Mass media culture of lawfulness campaigns can take place at both the national and local levels, depending on the type and cost of campaign proposed. Mobilizing support for a culture of lawfulness through local civic leaders will by its nature begin at a local level in selected communities.

This component is closely aligned to all three Sub - Intermediate Results as dictated in Intermediate Result 2: “Cooperation between Communities and Law Enforcement increase”, “Violence in CRP Communities reduced”, as well as “Institutional Capacity of CBOs, NGOs and MDAs improved.”

Illustrative activities under this component could include:

**Activity 1: Engaging police to promote a culture of lawfulness by example**
Police are often the primary contact the average citizen has with the state. Thus, police play a critical role, for better or worse, in shaping public perceptions of the law. Illegal behavior by corrupt police undermines respect for the rule of law and for the state and promotes distrust and fear. At the same time, police officers who actively promote a culture of lawfulness through example and through respect for the rights of others can make a big difference in influencing the behavior of others.

The contractor will work with the JCF in augmenting current ethics training programs to promote a better understanding of how and why respect for the rule of law contributes to professional police work, and provide concrete decision-making and problem-solving skills on the part of police officers to engage the community and become positive role models. Consideration will be given to the development of GCC awareness raising as well as for specialized police training modules (integrated into the regular training curriculum) that aims to improve how police deal with increased crimes, especially gender-based violence, more likely to take place after disasters. This will support JCF programs to improve accountability and integrity in community-police relationships, while simultaneously reducing the risks associated with climatic shocks. A portion of this program can be implemented through the CBP program outlined in Component 4.

**Expected Results**
- A culture of lawfulness curriculum is incorporated into both entry level and in-service police training.
- Police through improved behavior set an example for respect for the law and the rights of others.
Activity 2: Mass Media Campaigns to foster a culture of lawfulness
It is difficult to underestimate the influence of mass media on the attitudes and behavior of society. In addition to newspapers, television and radio, we also have the internet, mobile telephones, twitter, social networking sites, and other elements through which messages can be rapidly conveyed to an ever-growing audience. The media is an invaluable societal partner in identifying corrupt behavior and rallying public support for reforms. Thus, media training and strengthening to enhance professional skills and promote an understanding of the media’s role in fostering the rule of law is a primary component of this activity. Media professionals who would be enthusiastic and credible participants should be identified and encouraged. In addition to media training, the small grants described in Component No. 1 can be tapped into for media programs to promote the rule of law.

Expected Results:
- Journalism skills are enhanced and media campaigns launched to promote greater awareness of citizen rights and responsibilities.
- Annual community forums media broadcasts.

Activity 3: Civic Leaders / Civil Society Organizations involvement in a culture of lawfulness
Community organizations or individuals (sometimes religious leaders or churches, civic organizations, community activists, NGOs focusing on youth or the environment, women’s organizations, and the like) are often in daily contact with a significant percentage of the population in a community and have earned the respect of the community through their previous work or reputations for showing moral or other leadership. These community leaders and organizations can help to reinforce the “culture of lawfulness” message being taught in the schools and promoted by the mass media and will contribute their own ideas and efforts to help promote citizen responsibility and mutual respect. Through involvement in executive committees in the selected communities, these leaders / organizations can help in the development of projects, workshops, and the like to promote stronger family relationships, positive social interactions, and overall respect for the rule of law. Other activities could include a campaign to restrict consumption of alcohol in public places where it has been shown to increase violent behavior or lawlessness or “respect for others” campaigns. The specific activities to be developed will vary depending upon the priorities of the individual communities.

Expected Results:
- Executive committees in selected cities promote and coordinate a multi-pronged approach to fostering a culture of lawfulness.
- Increased number of citizens promoting a cultural of lawfulness message.
- Selected communities develop and implement projects designed for those particular communities that help to foster a culture of lawfulness.
- Citizen awareness of and respect for the rule of law and rights of others increases, as measured by citizen surveys.
- Possible replication of best practices in the Caribbean.

Impact of Component 2 after 5 years:
Increased respect for the law.
A more law abiding citizenry.
Change in percentage of citizens, including youth, with civic knowledge and/or exhibiting democratic values.
Citizen awareness of rule of law increased.

**Component 3: Encourage alternative sentence (to jail) programs for juveniles.**

While the overwhelming majority of youth who come into conflict with the law commit petty non-violent offences, a small percentage of youth do commit serious and violent crimes. Considering the context of violence and neglect in the lives of many of these youth, this is not surprising, but it does mean that these youth can pose a risk to their communities and often to themselves. Yet, the evidence concerning these youth is also overwhelming: incarceration and a criminal justice response that is focused solely on punishment and deprivation of their liberty simply does not work. On the other hand, justice responses that are child focused and provide intensive community-based support, addressing the root causes of their offending, do work. The number of these initiatives is growing all over the world yet, despite real evidence of their effectiveness, they remain ad hoc, small scale initiatives. Meanwhile, reliance on long-term incarceration continues to be the norm despite overwhelming evidence that it is ineffective and can actually make the offending worse. Community-based responses can and should be developed to deal with youth who commit serious offences. In the Caribbean there is a glaring absence of appropriate institutions, programs and practices for handling juvenile offenders. The only sustainable approach to the problem of juvenile crime throughout the Caribbean requires a focus on its root causes and the development of long-term solutions that are community based. This program will target first-time juvenile offenders and create specialized policies and practices to channel them into and through programs and facilities that afford the opportunity for their early rehabilitation and return to productive society.

In Jamaica, the National Youth policy states that violence both in the community and within the home is an unfortunate feature of the challenges confronting youth in the Jamaican society. Youth both contribute to this violence and are victims of it. Statistics referenced in this policy reveal that about 15 percent of students between ages 10-18 carry a weapon to school. Fourteen percent of boys and five percent of girls have been stabbed or shot in a fight and eight percent of all adolescents have been knocked unconscious in a fight. One in six adolescent belongs to a gang at some point in their youth.

In addition, youth live in a society where drug use is pervasive. Many classified hard drugs like cocaine are increasingly easy to get. At the same time, few youths view the use of marijuana as risky due to beliefs that are deeply rooted in the culture of the Jamaican people, especially among grassroots/inner-city communities. Marijuana or “ganja” smoking among youth rose significantly between 1987 and 1997 and continues to rise. Moreover, youth are arrested, jailed and murdered at twice the rate of the general population, with over 400 youth in Juvenile Correctional facilities and another large percentage in the general correctional services, with

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4 Jamaica National Youth Policy, 2004
5 National Commission on Ganja, 2001
6 Jamaica National Youth Policy, 2004
many possessing criminal records that present obstacles to accessing legitimate social services and accompanying opportunities. Based on the results of a needs assessment, the project will select several target vocations in which to train the girls at South Camp. The implementer will work with USAID to ensure that any additional infrastructure needed to accommodate training is constructed. Some initial needs include a chicken coop, agriculture plot, beauty salon, and culinary arts program. Dental/medical facilities may need to be built or improved and/or current staff trained including those needed for female reproductive health.

This component represents a child-friendly, rehabilitative, integrated and holistic approach to assisting young delinquents to become active citizens through the engagement of different social actors, including alternative sentencing for youth such as community service. This includes four main areas: Prevention, Justice System, Diversion, and Reintegration and Rehabilitation. Programs and practices will be shared with other countries in the Caribbean who are facing similar challenges.

This component falls under both Sub - Intermediate Results 1 and 2 as dictated in Intermediate Result 2: “Cooperation between Communities and Law Enforcement increase”, as well as “Violence in CRP Communities reduced.”

Illustrative activities under this component could include:

**Activity 1: Prevention**

It is important to prevent youth from coming into conflict with the law from the outset by addressing the care and protection challenges they face. This includes working to implement strategies supporting youth within their families, communities and societies. Effective early interventions with a holistic, multi-sectoral and community-based approach involving the education, health, and JCF must be involved and implemented to prevent youth from coming into conflict with the law.

**Expected Results:**
- Emphasis on parenting and family, community, and society involvement in youth’s lives increases
- Support systems for at-risk youth strengthened

**Activity 2: Diversion/Alternative Sentencing**

Diversion activities or alternative sentencing must be seen as the priority and the first response to youth coming into conflict with the law. The formal justice system should be reserved for serious and violent offenders only. A program for youth who have committed petty offences, usually first offences, and whose behavior has been criminalized (and who represent the overwhelming majority of juveniles in conflict with the law) should be diverted away from the criminal justice system through community-based alternative diversion mechanisms or sentencing. Diversion must take place at every given opportunity, including informal diversion mechanisms at the community level, but also within the justice system. Key actors, including community leaders, members of the JCF, and judges, should be trained to understand the importance of diversion or alternative sentencing, as well as their role in it and the alternative mechanisms available. In doing so, resources and priorities should be refocused away from the
expensive, ineffective, and often dangerous justice system to developing a range of sustainable and localized community based options focused on reintegration, guidance and support.

The formal criminal justice system should only deal with the very small minority of juveniles who have committed very serious crimes and who represent a threat to themselves and/or Jamaica.

Expected Results:
- Community leaders, social workers, JCF, and judges are trained and aware of alternative sentencing mechanisms
- A support system for juveniles is implemented
- Recidivism of youth engaged in diversion programs or alternative sentencing decreases

Activity 3: Reintegration and Rehabilitation
In order to successfully reintegrate and rehabilitate juvenile offenders, the engagement and support of community police, key government agencies, civil society, local courts and community leaders is important. This may include such activities as training (of youth, CDA personnel and residential care staff), relationship building, advocacy, networking, providing services and safe neighborhood spaces for addressing the social needs and concerns of youth in transition from State care and the development of independent living protocols and standard operating procedures manuals for Children’s Homes and Places of Safety, and involvement with alternative sentencing to create an environment of support for juvenile offenders. As part of the youth reintegration and rehabilitation process safe neighborhood space may include the renovation or construction of a transitional housing facility for girls leaving state care.

The most marginalized youth need to be supported and encouraged to play a positive and constructive role in their community. In doing so, youth, including those who have already come into conflict with the law, should be involved in preventative strategies to minimize them coming into the law in the first place (see activity 1), as well as in the reform of the justice system and the development of community-based alternatives. Youth need the opportunity to be recognized, not just as victims or perpetrators, but as social actors and members of families, communities and societies. The aim and focus of interventions with youth deemed ‘at risk’ should be to empower and support them to respond to these challenges and to make better choices for themselves and their communities. This could include education, skill development and employment.

Many offenders are school dropouts; therefore, this activity will assist offenders in completing their primary and secondary school education. Many offenders, including gang members, violate the law in response to having little education and even less chance of being employed. This activity is designed to prepare juvenile offenders to enter the workforce via intensive employment-readiness training and internships. This activity also helps to connect young people to post-secondary education and job-training programs that provide industry-recognized certification and unsubsidized employment. This activity should occur alongside and complement Component 2, Activity 3.

Expected Results:
• Programs that equip juvenile offenders with skills to allow them to engage in lawful money making endeavors are strengthened.
• Increased readiness of juveniles transitioning from State care to independent living.
• More juvenile offenders engage in the formal sector.
• Decrease in recidivism.
• Independent Living Protocol and procedures manuals developed and adopted into the operating procedures of the Child Development Agency.
• Safe neighborhood space established as ‘transitional housing’ to accommodate female juvenile offenders exiting State care for up to two years.
• Best practices disseminated and shared throughout the Caribbean.
• Juvenile justice programs rolled out throughout the Caribbean.

Impact of Component 3 over five years:
• Reduced recidivism among youth throughout the Caribbean.
• Decrease in number of crimes committed by young people Caribbean-wide.
• Decreased in number of youth in jail throughout the Caribbean.
• Increase number of juvenile delinquents engaged in society Caribbean-wide.
• Smoother transition of youth from State care to adulthood and independent living.

Component 4: Continued Support for the Jamaican Constabulary Force Community-Based Policing (CBP) Program.
The Jamaican Constabulary Force has made progress in recent years in moving forward to implement CBP on a national level, but work remains to be done. As recommended in the COMET Evaluation, 2012, efforts must be made to consolidate the gains that have been in CBP.

This component falls under both Sub - Intermediate Results 1 and 2 as dictated in Intermediate Result 2: “Cooperation between Communities and Law Enforcement increase”, as well as “Violence in CRP Communities reduced.” Of course, it is more closely aligned with the former rather than the latter.

This component will include the following illustrative activities:

Activity 1: Continue support for the national roll-out of community-based policing
The JCF has made important strides incorporating the Community-Based Policing (CBP) Model for the past decade. At this point manuals have been developed, officials trained and pilot projects implemented that have facilitated the identification of good practices. The present leadership supports CBP and it has been mainstreamed into the JCF vis-à-vis theories, principles and practices. Another key aspect of the CBP approach is the involvement of communities in the process. The continued dissemination of information and heightened public awareness through the media and other civic campaigns have secured buy-in and promoted important partnerships between the JCF and communities in tackling issues of crime and violence and enhancing safety and security.

The Contractor will support ongoing CBP training and development initiatives in cooperation with and supplemental to the Change Leader program to facilitate the reform process and strengthen the elements needed for a successful nationwide implementation of CBP. As required
by any change management effort, incentives for operating in a community-based fashion must be developed. Effective implementation of CBP principles should be rewarded by promotions and other incentives, and embracing CBP should be seen as the means of moving up in a police career. Those who obstruct change should be marginalized and penalized. The changes must be inserted into daily work routines. Leaders can identify small instances of good performance and recognize those who are part of the shift in philosophy.

The contractor should propose activities to be carried out in police stations that will improve community/policing relations. Such activities could include mechanisms to provide information on the procedures and services, with particular attention to services for victims of domestic and sexual violence and referrals to other institutions when necessary. Other activities could include regular meetings with community organizations to share concerns, gather information on dangerous spots, disseminate information and paraphernalia on CBP and anti-corruption, disseminate information on the impact of firearms and alcohol in crime in certain settings, as well as providing feedback to the JCF concerning its overall progress in implementing CBP.

Activities focusing on youth, such as sponsorship of sports leagues or outreach activities to schools, are strongly encouraged. Police can improve their relations with youth and youth by carrying out activities such as mock investigations of common crimes in a classroom setting that will help explain the different roles of each actor in the criminal justice system, including the role of citizens as affected parties and witnesses, and how a case is solved in practice. Such activities can greatly help citizens understand the role of the police and how they can support the police in crime prevention, as well as educate them about the broader criminal justice system. In this regard, consideration should be given to strengthening of, or creating, local climate change adaptation committees, linked with the local authorities and police to coordinate on weather-related disaster response.

**Expected Results:**
- Improved citizen perceptions with improved services at Police stations.
- Improved engagement of community members in Neighborhood Watch activities.
- More accountability of the police in their respective communities.
- A decrease in the complaints of human rights abuses committed by police as a direct result of the implementation of the CBP model.
- Community-based policing model is embraced by selected countries in the Caribbean.

**Activity 2: Support for JCF Anti-Corruption Strategy**
In response to the GOJ’s spotlighting corruption as a major priority, the USG has bolstered its ability to root out corruption by strengthening new and existing host country institutions, strengthening the media and advocacy organizations, and increasing public access to information. USAID will continue to advocate, privately and publicly, for the respect for human rights by supporting increased professionalism, transparency, and accountability within the Jamaican police force. USAID currently collaborated with Bureau of International Narcotics and Enforcement (INL) in providing complementary support for an anonymous corruption hotline as well as developing the Anti-Corruption Branch and the Central Vetting Unit. USG agencies will continue to work collaboratively to identify activities that can be jointly supported and, through the development of the new strategy and program activities, will agree on common goals and
roles for the respective agencies. These agencies will also continue to share information, participate in meetings with GOJ and other partners, and identify opportunities to deepen the impact of USG assistance in Jamaica. This activity is also a part of the larger ‘Culture of Lawfulness’ activity outlined under Component 3.

The Contractor should support the JCF in the implementation of the JCF Anti-Corruption Strategy 2010 to 2012, “Zero Tolerance – Prevention, Education and Detection” which calls for development of an effective and timely system for the removal of staff who act unlawfully, unethically and who lack integrity by maximizing the use of all available tools, in particular a careful review of police officers whose re-enlistment comes up every five years. Improved vetting at the outset of personnel and ongoing assessments should help to reduce the need for more punitive actions against offenders.

Expected Results:
- Improved recruitment and retention processes for police officers.
- Reduced levels of police corruption as those engaged in unlawful or unethical behavior are dismissed or weeded out in advance.
- Increased sensitivity by police to ethical obligations.
- Impact of Component 1 over five years

Impact of Component 4 after Five Years:
- Increased trust among citizens and police, including increased willingness of citizens to work with police.
- Improved perception of police.
- More professional police forces throughout the JCF.
- Increased accountability.
- Community based policing practices adopted throughout the country.

1.4 Locations Affected

The CBSI Program will promote the security of Community Renewal Program (CRP) communities and at-risk Youth through building safer communities, improved policing, and increased accountability and integrity in government. The program will capitalize on existing USAID investments in the sector and build on new opportunities that promote community-based partnerships to prevent crime and violence, support the rule of law, control corruption, increase citizen participation and youth engagement and to improve the adaptive and resilient capacity to natural hazards associated with global climate change (GCC).

Jamaica is the third largest island in terms of surface area and the largest English speaking island in the Caribbean and is located approximately 500 miles south of the United States. The population in Jamaica is close to 3 million and it is estimated 1.5 million people of Jamaican heritage live in the U.S. with another 1.3 million in the U.K. and other environs. Just over half the population lives in urban areas, with almost a quarter in and around the capitol, Kingston. Violent crimes tend to be geographically concentrated in poor urban communities, with more than half of them occurring in the Kingston Metropolitan Region and the major urban spaces in many other parishes.
Although safety and security issues are clearly not confined to urban areas or to poor people, they seem to have a more significant negative impact in poor urban communities. In keeping with this general pattern, the GOJ has mandated the CRP to ensure the provision of infrastructure and social services in vulnerable communities is to remain a priority. Under this mandate, the CRP is the vehicle for taking forward the National Crime Prevention and Community Safety Strategy (NCPCSS).

The CRP seeks to bring about long-term transformation in the 100 volatile and vulnerable communities in the five most crime affected parishes over a 10 year period. These parishes are Kingston, St. Andrew, St Catherine, St. James and Clarendon. Its goals, purpose and objectives are in sync with USAID Jamaica’s CDCS and will therefore provide a platform for the implementation of USAID’s CBSI programming. Increased coordination and harmonization is imperative; thus the selection of targeted communities must take into consideration the work that other International Development Partners (IDP) are undertaking within the CRP. USAID Jamaica will seek to maximize the impact of existing programs aimed at reducing crime and violence and promoting community development; hence the CRP will be the framework for increasing impact through working together.

With regard to the “Transitional Living Program for Children in State Care”, the Child Development Agency (CDA) has responsibility for all residential facilities island-wide. Twenty-three facilities with youth between the ages of 14 and 18 have been identified and will all be engaged under the program. The residential homes are located in 12 parishes. However, the GoJ, through the CDA, has identified a location in the parish of St. Ann where the transitional housing facility may be refurbished or constructed.

1.5 National Environmental Policies, Procedures or Regulations

The National Environment and Planning Agency (NEPA) of Jamaica is the agency responsible for integrating environmental planning and sustainable development policies and programs and ensuring that environmental impact assessments (EIA) are conducted when necessary that meet international standards. The agency website (http://www.nepa.gov.jm) outlines clear guidelines and contains the relevant forms for conducting EIAs. NEPA is charged with carrying out the following regulations of the Natural Resources Conservation Authority (NRCA) Act of 1991:

- Ensure compliance with Sections 9 & 10 of the NRCA, which gives the right to issue permits to persons undertaking new developments and request EIA studies where necessary;
- Ensure that environmental considerations are taken into account early in the planning of new projects;
- Monitor the discharge of certain waste into the environment;
- Ensure compliance with established NRCA environmental standards and conditions of approval;
- Ensure that goods and services are produced in an environmentally sound manner; and
- Bring existing facilities into compliance with environmental standards.

Persons undertaking new developments that fall within a prescribed category are required to
obtain a permit under NRCA. Licenses are also required for the discharge of trade or sewage effluent and for the construction or modification of facilities. Prior to the planning and/or implementation of activities that may lead to discharge of sewage or other effluents, USAID will facilitate meeting between officials at the National Environment and Planning Agency (NEPA) and the contractors to ensure that all the requirements of national environmental policies and regulations are outlined and understood. Once the requirements and relevant activities are agreed upon, the NEPA officers will provide the necessary guidance as to how to proceed.

2. Evaluation of environmental impact potential

An Environmental Mitigation and Plan and Report (EMPR) procedure can be used to apply established guidelines to grants under contract or similar programs that have not identified specific activities at the planning stage, and application of the guidelines will avoid significant environmental impacts. These activities typically recommend a Negative Determination with Condition. Use the LAC Environmental Guidelines as a reference: (http://www.usaid.gov/locations/latin_america_caribbean/environment/docs/epiq/epiq.html)

Activities that typically have a Negative Determination with Conditions (predictable and minor impacts) include:
- Construction or rehabilitation of small-scale infrastructure (schools, health clinics, etc.)
- Housing reconstruction for less than 100 people, etc.
- Water and sanitation systems for population of less than approximately 5,000,
- Irrigation systems for less than 100 ha, and
- Rural road improvement of limited extension.

Activities which typically have a Positive Determination (they may cause significant adverse environmental impacts) and require an Environmental Assessment include
- Irrigation (>100 ha) or water management projects (including dams)
- Leveling of land for agriculture
- Drainage projects
- Construction of new roads or improvement of extensive road network
- Sewage and potable water projects for populations over approximately 5,000
- Forestry activities, and
- Large scale agriculture activities

The following paragraphs discuss and evaluate the potential environmental impacts of activities under each component.

**Component 1: Promote community-driven activities to contribute to Improved crime prevention, Intervention and enforcement by addressing underlying causes of crime and Promoting improved communications / interactions with police.**

**Activity 1:** Small grants to provide support for community-based organizations and community-based projects.
Specific activities conducted under the competitive small grants program for communities and civil society organizations are not yet known and will be determined upon award of the small grants; therefore, it is unknown at this time whether this activity will result in adverse environmental impacts. Once the final grants are approved for award, conditions necessary to avoid and/or mitigate potential impacts will be imposed. Therefore, this intervention qualifies for a negative determination with conditions and would require that each small grant partner complete the EMPR form.

The development of GCC awareness raising materials, such as specialized police training modules for how to deal with increased crimes after disasters, is not anticipated to cause any adverse environmental impacts so long as mitigation methods for reducing paper and other waste are employed.

**Activity 2: Support and strengthen legitimate local governance structures including CBOs and CDCs.**
Climate change adaptation-related activities under this component, including engaging policy and community members in retrofitting containers to establish CRCs and equipping them with rainwater harvesting systems and renewable energy systems to supply “off-grid” power following disasters, are considered rehabilitation of small-scale infrastructure and thus require a negative determination with conditions. Conditions should include using internationally accepted green building standards (See LEED Green Building Standards7) for the shelters, including renewable energy methods, and protective measures on rainwater harvesting techniques to address potential water contamination and sanitation issues.

**Activity 3: Supporting youth empowerment in communities and creating youth-centered spaces and activities.**
Activities with CBOs and CSOs to identify and promote alternatives to criminal behaviors, such as recreational and sports activities, education, and job opportunities and training are not likely to have adverse environmental impacts. Mitigation measures will be implemented and monitored for the renovation or the small-scale construction of the residential housing facility, which may have minor adverse environmental impacts. Development of joint JCF and community group climate change adaptation/disaster risk management activities, such as clearing of key water channels from debris and sediment, will have a positive impact on the natural environment and physical infrastructure by reducing flooding and erosion, as well as providing jobs for those in need in a target community. This activity will integrate with Component 4 and includes training and planning workshops with the JCF on how they can support disaster risk reduction work through their CBP programs.

**Component 2: Develop long-term champions of a culture of lawfulness through engaging multiple sectors of society in a common effort to develop a culture supportive of the rule of law.**

**Activity 1: Engaging police to promote a culture of lawfulness by example.**
USAID will work with the JCF in augmenting current ethics training programs to promote a better understanding of how and why respect for the rule of law contributes to professional

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7 [http://new.usgbc.org/home](http://new.usgbc.org/home)
police work, and provide concrete decision-making and problem-solving skills to police officers. A portion of this program can be implemented through targeting the CSSB Support for the CBP program outlined in Component 4. These interventions consist of information sharing and training and will not have any adverse impact on the environment.

Activity 2: Mass Media Campaigns to foster a culture of lawfulness.
This activity targets media training to enhance professional skills and promote an understanding of the media’s role in fostering the rule of law. Potential partners include NIA and the Caribbean Institute of Media Communication at the University of the West Indies (UWI) in Jamaica to establish an investigative journalism course. Media professionals who would be enthusiastic and credible participants will be identified and encouraged. The interventions under this activity consist of increasing media awareness and training and are not expected to have any adverse impact on the environment.

Activity 3: Civic Leaders / Civil Society Organizations involvement in a culture of lawfulness.
Community leaders and organizations will help in the development of projects, workshops, and other methods to promote respect for the rule of law. Other activities could include a campaign to restrict consumption of alcohol in public places where it has been shown to increase violent behavior or lawlessness or “respect for others” campaigns. While the specific projects to be developed will vary depending upon the priorities of the individual communities, no significant adverse environmental impacts are anticipated under this activity, particularly if the “green meeting” checklist is followed for workshops held in existing facilities (no new facility construction is planned).

Component 3: Encourage alternative sentence (to jail) programs for juveniles.

Activity 1: Prevention
Community based and civil society organizations working collaboratively with other service providers to develop programs and activities to prevent youth from coming into conflict with the law from the outset by addressing the care and protection challenges they face. This includes working to implement strategies supporting youth within their families, communities and societies. Effective early interventions with a holistic, multi-sectoral and community-based approach involving the education, health, and JCF must be involved and implemented to prevent youth from coming into conflict with the law. These interventions consist of information sharing and training and will not have any adverse impact on the environment.

Activity 2: Diversion/Alternative Sentencing
A program for youth who have committed petty offences, usually first offences, and whose behavior has been criminalized (and who represent the overwhelming majority of juveniles in conflict with the law) should be diverted away from the criminal justice system through community-based alternative diversion mechanisms or sentencing. Diversion must take place at every given opportunity, including informal diversion mechanisms at the community level, but also within the justice system. Interventions will include training in importance of diversion or alternative sentencing, as well as their role in it and the alternative mechanisms available for key
actors, including community leaders, members of the JCF, and judges, and will not have any diverse impact on the environment.

**Activity 3: Reintegration and Rehabilitation**
In order to successfully reintegrate and rehabilitate juvenile offenders, the engagement and support of community police, relevant state agencies, civil society, local courts and community leaders is important. This may include such activities as training, relationship building, advocacy, networking, and involvement with alternative sentencing to create an environment of support for juvenile offenders. Interventions will be to empower and support at-risk youth through education, skill development and employment. This activity is designed to prepare juvenile offenders to enter the workforce via intensive employment-readiness training and internships. This activity also helps to connect young people to post-secondary education and job-training programs that provide industry-recognized certification and unsubsidized employment. This activity should occur alongside and complement Component 2, Activity 3, and will not have any adverse impact on the environment.

Under DGP-5, the UWI/CCDC’s “Transitional Living Programme for Children in State Care” will provide transitional living space for 40 female wards of the State upon their departure from State-owned residential facility. The objective is to improve the transition to independent living for children leaving residential care at the age of 18 and assist in reducing the risk factors associated with low skill development, inadequate life skills and poor self-image. The transitional housing facility may be refurbished or constructed and UWI/CCDC will ensure that the renovation or construction of the facility will have little or no adverse effect on the environment.

**Component 4: Continued Support for the Jamaican Constabulary Force Community-Based Policing (CBP) Program.**

**Activity 1: Continue support for the national roll-out of community-based policing**
Developing police training manuals and disseminating public information through the media and other civic campaigns is not anticipated to have any adverse environmental impact. Reductions in the amount of paper printed and wasted will be realized either through the distribution of material online or via television or radio ads or using recycled paper when printed copies are necessary. Training enforcement officials will not have an adverse impact on the environment if existing training facilities are used and construction is not required. Activities focusing on youth, such as sponsorship of sports leagues or outreach activities to schools, are not expected to have adverse environmental impacts. In the case where sports facilities are renovated, environmental impacts must be monitored and mitigated for small-scale construction and proper disposal of materials (including paints). Police activities, such as mock investigations of common crimes, will take place in a classroom setting and will not include construction of new facilities.

Hence this set of interventions would qualify for a categorical exclusion.

**Activity 2: Support for JCF Anti-Corruption Strategy**
USAID and other agencies activities to share information, participate in meetings with GOJ and other partners, and identify opportunities to deepen the impact of USG assistance in Jamaica are not expected to cause adverse environmental impacts and thus qualify for a categorical exclusion; however, to prevent potential impacts, USAID’s Green Meeting Planning Checklist (IEE Annex 1) is included below so that the contractor can adhere to USAID’s preferred methods and standards for conducting environmentally-friendly meetings. Additional considerations include considering the source and destination of materials, including food, paper, beverage containers, and human waste, used during meetings. Locally sourced food that is grown in nearby community or school gardens and recycling and compost waste bins would make a positive impression on meeting attendees of the associated environmental impacts of human consumption and waste.

3. Recommended Threshold Decisions and Mitigation Actions

The Initial Environmental Examination of the project activities was developed prior to the procurement process. The anticipated determination for most project activities is Categorical Exclusion per 22 CFR 216.2 (c) (2) (i) since activities qualify as "education, technical assistance, or training projects except to the extent such projects include activities directly affecting the environment (such as construction)."

However, because there may be small-scale construction or rehabilitation of infrastructure, it is anticipated that USAID will make a Negative Determination with Conditions, per 22 CFR 216.3(a)(3)(iii), where the Agency has developed design criteria which, if applied, will avoid a significant effect on the environment. The GLAAS request will require that these conditions be incorporated into implementing mechanisms.

3.1 Recommended Threshold Decisions and Conditions

The table below provides the recommended determinations for interventions under each objective.

<table>
<thead>
<tr>
<th>Activities</th>
<th>Intervention</th>
<th>Recommended Determination</th>
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<tbody>
<tr>
<td>Component 1, Activity 1. Small grants to provide support for community-based organizations and community-based projects.</td>
<td>Establishment of a competitive small grants program for communities and civil society organizations; Community Pilot Project activities TBD.</td>
<td>NDWC</td>
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<td></td>
<td>Development of GCC awareness raising materials, such as specialized police training modules</td>
<td>CE</td>
</tr>
<tr>
<td>Component 1, Activity 2. Support and strengthen legitimate local governance structures including CBOs and CDCs.</td>
<td>Institutional efforts to strengthen CBOs and local climate change adaptation committees. Retrofitting community disaster shelters and equipping them with rainwater harvesting systems and renewable energy systems to supply “off-grid”</td>
<td>CE NDWC</td>
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power which may require small-scale construction.

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<thead>
<tr>
<th>Component 1, Activity 3. Supporting youth empowerment in communities and creating youth-centered spaces and activities.</th>
<th>Working with CBOs and CSOs to identify and promote alternatives to criminal behaviors, such as recreational and sports activities, education, and job opportunities and training. The renovation or construction of a housing facility will help to improve the transition to independent living for children leaving State care at age 18.</th>
<th>CE NDWC</th>
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</thead>
<tbody>
<tr>
<td>Component 2, Activity 1. Engaging police to promote a culture of lawfulness by example.</td>
<td>Augmenting current law enforcement ethics training programs, improving police officer decision-making and problem-solving skills through information sharing, training</td>
<td>CE</td>
</tr>
<tr>
<td>Component 2, Activity 2. Mass Media Campaigns to foster a culture of lawfulness.</td>
<td>Media training to enhance professional skills and promote an understanding of the media’s role in fostering the rule of law, including establishing an investigative journalism course. Identifying and encouraging media professionals who would be enthusiastic and credible participants</td>
<td>CE</td>
</tr>
<tr>
<td>Component 2, Activity 3. Civic Leaders / Civil Society Organizations involvement in a culture of lawfulness.</td>
<td>Community leaders and organizations will help in the development of projects, workshops, and other methods to promote respect for the rule of law, including a campaign to restrict consumption of alcohol in public places</td>
<td>CE</td>
</tr>
<tr>
<td>Component 3, Activity 1. Prevention</td>
<td>Community based and civil society organizations working collaboratively with other service providers to develop programs and activities to prevent youth from coming into conflict with the law. Interventions consist of information sharing and training.</td>
<td>CE</td>
</tr>
<tr>
<td>Component 3, Activity 2. Diversion/Alternative Sentencing</td>
<td>Interventions will include training in importance of diversion or alternative sentencing, as well as their role in it and the alternative mechanisms available for key actors, including community leaders, members of the JCF, and judges, and will not have any diverse impact on the environment.</td>
<td>CE</td>
</tr>
<tr>
<td>Component 3, Activity 3. Reintegration and Rehabilitation</td>
<td>This may include such activities as training, relationship building, advocacy, networking, and involvement with alternative sentencing to create an environment of support for juvenile offenders. Additional activities may include the development of independent living protocols and standard operating procedures manuals for Children’s Homes and Places of Safety, training of CDA officers and residential care staff, and the renovation or construction of a transitional housing facility for youth in State care. Interventions will</td>
<td>CE NDWC</td>
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be to empower and support at-risk youth through education, skill development and employment.

<table>
<thead>
<tr>
<th>Component 4, Activity</th>
<th>Description</th>
<th>Mitigation/Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Continue support for the national roll-out of community-based policing</td>
<td>Developing police training manuals and disseminating public information through the media and other civic campaigns</td>
<td>Categorical Exclusion (CE)</td>
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<tr>
<td></td>
<td>Training of enforcement officials, improving access to CBP information and provision of educational classes</td>
<td>CE</td>
</tr>
<tr>
<td></td>
<td>Sponsorship of youth sports leagues or outreach activities to schools</td>
<td>CE</td>
</tr>
<tr>
<td></td>
<td>Community Pilot Project activities TBD.</td>
<td>Negative Determination with Conditions (NDWC)</td>
</tr>
<tr>
<td>Component 4, Activity 2. Support for JCF Anti-Corruption Strategy</td>
<td>USAID and other agencies will work collaboratively to identify JCF activities and other ways to share information, participate in meetings with the GOJ and other partners, and identify opportunities to deepen the impact of USG assistance in Jamaica</td>
<td>CE</td>
</tr>
</tbody>
</table>

For any activities that are determined to be a Negative Determination with Conditions, the grantee/contractor will be required to fill out an Environmental Mitigation Plan and Report (EMPR) for each thematic area (e.g. rehabilitation of small scale building, construction of greenhouses, water systems, bridges, etc.). If a supplemental/amended IEE is completed for activities that are added to the project that may involve a negative impact to the environment, all grantees and or implementing partners (IP) will be required to complete an EMPR or amend their existing EMPR. The EMPR would need to be completed before any actions that would have a negative impact, be implemented. The attached EMPR includes:

- Coversheet;
- Narrative with project specific information;
- Annexes:
  - Environmental Screening Form (Table 1);
  - Identification of Mitigation Plan (Table 2);
  - Environmental Monitoring and Tracking Table (Table 3);
- Photos, Maps and Level of Effort.

The EMP will capture potential environmental impacts and also dictate whether a supplemental IEE or a Pesticide Evaluation Report and Safer Use Action Plan or “PERSUAP” is required.

**3.2 Mitigation, Monitoring and Evaluation**

**Mitigation/Conditions:**
The implementer(s) will be required to complete an EMPR for any Negative Determination with Conditions activities listed in Section 3.1 of this IEE to identify any potential negative impacts, identify appropriate mitigation measures, and ensure that monitoring of the mitigation measures implementation and effectiveness is completed. In addition, the Implementing Partners shall apply the following mitigation measures to ensure that environmental concerns are taken into account during both the design and implementation of the project activities:

Implementing partner(s) shall follow environmental best practices in construction for small scale infrastructure activities, such as the disaster shelter rehabilitation project under Component 1, the renovation and or construction of transitional housing facilities, as well as other activities that may take place under the community pilot projects or small grants program. These best practices include minimizing the amount of environmental degradation and disturbance to land, water, and other resources due to soil compacting and grading, sedimentation, water contamination, displacement of local populations (human, plant, and animal) and habitats, and damage to cultural sites, for example. Other mitigating measures may include concentrating noisiest work; fencing facilities/excavation sites to control noise and wetting ground to keep dust at a minimum; designing facility to create least impact; and using the most environmentally friendly sound source of materials. Global climate change must also be considered and mitigation and adaptation measures incorporated whenever it is feasible.

A mitigation and monitoring plan (EMPR form) for the rainwater harvesting and renewable energy systems is presented in the attached table that may be incorporated into the work plan. Similar plans may be required for activities under the community pilot projects and small grants program that trigger the need for mitigation.

Mitigation activities will require the implementing partner(s) to assess the safest procedures feasible for construction, environmental and human health protection, and essential hygiene practices through adequate sanitization of products, safe disposal of materials, water purification and safe storage.

Implementing partner(s) will be required to follow the WHO’s guidelines for safe disposal of human waste and trash, environmental sanitation and safe water found at: [http://www.who.int/water_sanitation_health](http://www.who.int/water_sanitation_health). The implementer will be required to submit rainwater harvest and purification designs and renewable energy system plans to USAID/Jamaica for approval prior to construction of the prototype and adapted models.

Implementing partner staff and USAID will ensure that each activity uses environmentally sound principles and includes long-term operational and maintenance plans beyond the life of the program to help ensure that all activities have adequate buy-in and long-term sustainability (see Sustainability Analysis section).

USAID/Jamaica and/or the contractor shall consult with community leaders and organizations as well as law enforcement and other state entities to help assure that the proposed mitigation measures are realistic and likely to be followed.

**Monitoring and Evaluation:**
To ensure that interventions are designed in a sound and sustainable manner, the Mission Environmental Officer (MEO), the Contracting Officer’s Representative (COR) and Agreement Officer’s Representative (AOR) will work with the implementing partner to achieve compliance with these procedures. The implementing partners will have well defined responsibilities for implementing the mitigation measures, monitoring activities, and providing on a periodic basis activity performance reports. The COR/AOR will have as one of his/her main tasks the monitoring and reporting on the environmental implications of the activities. This includes soliciting and reviewing grantee reports on environmental mitigation and monitoring actions, and undertaking periodic examinations of the environmental impacts of activities and associated mitigation and monitoring activities. The EMPR form Table 3 shall be used by the Implementing Partner to monitor mitigation measures. Table 3 shall be incorporated into the Environmental Compliance section of the Implementing Partners Report.

The environmental status of the project will be prepared periodically during the implementation by means of routine site visits by USAID/Jamaica staff. Any required correction in implementation will be made on the basis of these findings and in accordance with the environmental guidelines.

The implementers shall include environmental compliance and reporting language into each sub-implementation instrument, and ensure that appropriate resources (budget), staff, equipment, and reporting procedures are dedicated to this portion of the project. The implementer will ensure that sub-implementing partners have sufficient capacity to complete the environmental screening process and to implement mitigation and monitoring measures.

Performance evaluation will be in accordance with high-quality evaluation policies and corresponding procedures. The implementer’s performance on specific activities will be evaluated annually by the COR/AOR, utilizing the performance standards set forth within the award. Project evaluations (midterm and final) will be integrated with implementation to allow ongoing, regular tracking of emerging changes to the political environment, potential unanticipated effects, and to strengthen the project as it unfolds. The evaluations will address questions including: How able and interested are law enforcement and CSO’s leadership and staff and how adequate are their capacity and resources to build on strengths and resolve weaknesses in administrative and project management? How can capacities be developed within the enforcement agencies and CSOs to enable ongoing self-sustaining delivery of results and service delivery? Is there evidence of changes within targeted communities as to perception of law enforcement and rule of law more broadly?

**Environmental Compliance language for Contracts/Awards**

Language in contracts and agreements should be included to ensure that the Contractor/Implementing Partner is aware of and implements required mitigations or other prescribed environmental management measures pertinent to Regulation 216. The specific language to be included in all contracts and agreements is outlined below:

USAID 22 CFR 216 Compliance Contracting Language
In accordance with USAID’s recognition that gender, anti-corruption, and environmental issues are important considerations in development, the Contractor shall include in their project proposal explanations on measures they intend to take to deal with these issues. During project implementation, the Contractor/Recipient shall take these issues into account and find ways to enhance gender balance, reduce corrupt practices, and protect the environment in areas related to their project. To ensure compliance with the USAID environmental regulation 22 CFR 216 and ADS204, the direction provided in ADS 204 Annex “Environmental Compliance Language for Contracts & Agreements” must be followed for Categorical Exclusions and Negative Determination with Conditions. This language must be included in all RFPs, Contracts, and/or Agreements and subcontracts. The Implementing Partner and COR shall ensure that appropriate environmental guidelines are followed, that Conditions measures described in the pertinent Environmental Threshold Decision for each of these activities are funded and implemented, including any necessary training or capacity building, and adequate monitoring. The procurement and/or use of pesticides would require an amended IEE, pursuant to USAID’s Pesticide Procedures 22 CFR 216.3(b)(l)(ii)(a-l). The Contractor/Agreement Recipient may be required to report results disaggregated by gender and measures taken to enhance the environment and reduce corrupt practices.

4. Revisions
As with all USAID-funded projects, and pursuant to 22 CFR 216.3 (a) (9), if new information becomes available which indicates that any of the proposed actions to be funded under this activity might be "major" and their effects "significant", the threshold decisions for those actions will be reviewed and revised by the MEO and an environmental assessment prepared, as appropriate.

For additional references and details, please see the Automated Directive System (ADS) 204

Environmental Procedures:

USAID Environmental Compliance site:
http://www.usaid.gov/our_work/environment/

Latin America and Caribbean Bureau Environmental Compliance site:
DRAFT EXAMPLE-Mitigation and Monitoring Plan for Component 1

<table>
<thead>
<tr>
<th>Issue or aspect of activity</th>
<th>Potential Environmental Impact The activity may . . .</th>
<th>Mitigation Note: Mitigations apply to specific project phases: site selection (SS); planning and design (P&amp;D), construction (C), operation and maintenance (O&amp;M)</th>
<th>Monitoring indicator</th>
<th>Frequency, location and responsibility of monitoring Include extra column for cost as needed</th>
</tr>
</thead>
</table>
| Rainwater harvesting barrels, tanks, etc. for post-disaster water supply | • Create pools of stagnant water which may result in increase of vector-borne diseases  
• Contaminated drinking water through animal contact, e.g. birds, rodents, etc. | • Do not allow animals to make contact with water or inside of storage tanks (C) (O&M)  
• Monitor and repair leaks from cracked containment structures, broken pipes, faulty valves, and similar structures (O&M)  
• Maintain sanitary withdrawal systems within safe yield limits to avoid drinking water contamination (O&M)  
• Focus on the National Environmental and Planning Agency guidelines on construction use and maintenance as part of behavior change and education program (C) (O&M)  
• Monitor water levels to ensure supply post-disaster (O&M) is compliant with the Office of Disaster Preparedness and | • Storage and withdrawal structural inspection  
• Water quality test (for fecal coliform bacteria and carcinogens, such as lead)  
• Human health (incidence of gastrointestinal disease in users)  
• Water level  
• Water treatment  
• Maintenance records of water catchment area | • Designated, trained community inspector to record storage and withdrawal structural inspection on a quarterly basis.  
• Water quality tests completed after construction by activity implementer, and during quarterly structural inspections thereafter by designated representative from community.  
• Water level test completed twice annually (end of dry and wet seasons)  
• Community use and human health surveys (interviews) completed annually by designated representative from |
<table>
<thead>
<tr>
<th>Renewable energy systems for disaster shelters</th>
<th>Emergency Management</th>
</tr>
</thead>
</table>
| - Cause dangerous electrical conditions during natural disasters, such as severe storms, flooding, etc.  
- Increase risk of exposure to harmful | - The construction and anchoring to ensure storage tanks do not spill, leak, tip over, etc. (P&D) (C) done in accordance with the National Environmental and Planning Agency  
- **Ensure** sanitation and maintenance of surface from which water will be harvested which is essential to reduce exposure to chemicals (e.g. lead paint chips), fecal matter, and other sources of bacteria is in accordance with the National Solid Waste Management Authority (decomposing plant or animal matter, etc.) (SS) (P&D) (C) (O&M) |

| | - Energy system structural inspection  
- Drainage, soakway installed according to specifications |
| | - Designated, trained community representative to inspect and record structural damage on a semi-annual basis and post-disaster  
- Soakway inspected and functioning properly upon completion of construction by activity implementer |

- Energy system structural inspection  
- Drainage, soakway installed according to specifications  
- Designated, trained community representative to inspect and record structural damage on a semi-annual basis and post-disaster  
- Soakway inspected and functioning properly upon completion of construction by activity implementer | community committee.  
- Trained community and/or activity member to regularly monitor and clear water catchment area of potential sources of contamination |
| materials if not disposed of properly during maintenance and repairs | **Pesticide Control Authority** and do not contaminate drinking water sources or increase public exposure to trash and debris | • Recordkeeping of proper disposal of replaced materials |

Based on *Environmental Guidelines for the USAID Latin America and Caribbean Bureau*, December 2003, page 2-25
IEE Annex 1:  
**Green Meeting Planning Checklist: Setting Environmental Priorities**

In this checklist, environmentally aware meetings and events are those planned in such a way as to eliminate, reduce, or recycle waste. While focusing on municipal solid waste, this checklist also touches on other environmental concerns. It is intended to heighten the environmental consciousness of event planners and demonstrate the advantages of conducting environmentally aware events.

Consider the following as you select your environmental priorities:

**Preventing and Reducing Waste**
- Focus on reducing waste, given limited in-country recycling facilities
- Use double-sided printing, recycled content -where available- for promotional materials and handouts.
- Avoid mass distribution of handouts. Allow attendees to request copies or provide digital copies via CD, thumb drive, or website.
- Provide reusable name badges.
- Purchase large volume plastic bottles of water- or use tap sources of safe drinking water- to dispense into glasses at each table, instead of individual sized plastic bottles
- Other actions: _____________________________

**Recycling and Managing Waste**
- Where recycling facilities exist, collect paper and recyclable beverage containers in meeting areas.
- Collect cardboard and paper in exhibit areas.
- Collect cardboard, beverage containers, steel cans, and plastics in food vending areas.
- Separate out organic waste for composting. Provide composting guidelines for conference venues.
- If reusables are not used, encourage use of recyclable containers.
- Other actions: _________________________________________

**Conserving Energy and Reducing Traffic**
- Seek naturally lighted meeting and exhibit spaces.
- Provide shuttle service from hotels to the event site.
- Choose meeting sites that have on-site housing
- Other actions: _________________________________________

**Contracting Food Service and Lodging**
- Plan food service needs carefully to avoid unnecessary waste.
- Consider use of durable food service items instead of disposables.
- Donate excess food to charitable organizations, including planning ahead via SOW/contract with the conference venue to ensure this happens.
- Work with hotel on non-replacement of linens, soaps, glassware, etc. when changes not needed.
- Other actions: _________________________________________

**Buying Local, Environmentally Aware Products**
- Consider providing locally sourced food and meeting materials.
- Use recycled paper for promotional materials and handouts, where available.
☐ Consider selling or providing refillable containers for beverages.
☐ Provide reusable containers for handouts or samples (pocket or file folders, cloth bags).
☐ Where reusable items are not feasible, select products that are made from recovered materials and that also can be recycled.
☐ Other actions: _________________________________________

**Educating Participants and Exhibitors**

☐ Request the use of recycled and recyclable handouts or giveaways.
☐ Request that unused items be collected for use at another event.
☐ Encourage participants to recycle materials at the event.
☐ Reward participation by communicating environmental savings achieved.
☐ Other actions: __________________________________________

GUIDELINES FOR IMPLEMENTING PARTNERS ON THE USAID LAC ENVIRONMENTAL MITIGATION PLAN & REPORT (EMPR)

August 18th, 2009

A. Background

All projects funded by USAID must conform to US environmental regulations (22 CFR 216) requiring evaluation to ensure that no adverse environmental impacts result from the projects, that cannot be mitigated. All USAID programs funded through USAID LAC Missions fall under an Environmental Threshold Decision (ETD) designated at the Strategic Objective level. The Environmental Mitigation Plan & Report (EMPR), so described by these guidelines, ensures programmatic compliance with 22 CFR 216 by meeting the conditions specified in the applicable ETDS authorized by the USAID Latin America and the Caribbean (LAC) Bureau Environmental Officer (BEO).

Programs implemented by USAID LAC Mission implementing partners (IPs) include a range of discrete-activities under various awards that will likely have a risk for adverse environmental impact. Illustrative discrete activities include building refurbishment and medical waste management. This EMPR procedure will provide for both the screening for environmental risk, preparation of a mitigation plan and reporting on monitoring of these mitigation measures, which require that appropriate consideration is given to gender as a social impact factor in the development of a mitigation plan and subsequent measures.

The EMPR initially categorizes projects into three types: No Risk, Medium Risk and High Risk. Those with No Risk can continue without further review. Those with High Risk must be reconsidered for the need of an Environmental Assessment. The EMPR deals with those projects at Medium Risk (see Figure 2).

All grantees/contractors will be required to fill out an Environmental Mitigation Plan & Report (as attached) per project type that includes:
1. The Environmental Screening Form,
2. The Identification of Mitigation Plan, and
3. The Environmental Monitoring and Tracking Table.

Program managers/COTRs and Chiefs of Parties can work with the USAID Mission Environment Officer (MEO) to ensure impacts are sufficiently identified and mitigation actions are agreed upon, including clear guidance on the procedures for gender integration where fitting.
Figure 1: Timeline of Reporting Requirements for Environmental Mitigation

B. Timing of Reporting Requirements

During the acquisition process, the applicant or contractor submits a suggested/draft EMPR. Gender issues must be addressed in the Environmental Mitigation Plan in keeping with the Agency’s executive message on gender integration dated May 4, 2009. Once the Implementing Partner is chosen, a revised initial EMPR is submitted by the applicant or contractor to the COTR, Mission Environmental Officer, and Regional Environmental Officer for approval before commencing activities. For sub grants, the grantee is required to fill out the EMPR and submit it for approval to the Chief of Party (COP). The COP then submits the EMPR for review and final approval to the COTR and MEO.

A format for this initial EMPR can be seen in attachment 1; it includes:

1. An initial screening process using the “Environmental Screening Form” (Appendix 1, Table 1) to assure the project is at the Medium Risk Level followed by,

2. The identification of potential impacts and related mitigation measures using the “Identification of Mitigation Plan” (Appendix 1, Table 2) for each sub-activity.

3. The Environmental Monitoring and Tracking Table (Appendix 1 Table 3) that documents the necessary mitigation measures to be monitored, lists monitoring indicators, and includes who will conduct the monitoring when. Table 3 also includes a monitoring chart that documents who conducted the monitoring and the effectiveness of the mitigation measures.

At the end of each year of implementation, the EMPR is resubmitted with the same information as provided initially, plus a component reflecting the status of implementation and effectiveness monitoring, of the identified mitigation measures using the “Environmental Monitoring and Tracking Table” (Appendix 1, Table 3). This table will be used for project environmental monitoring and will be submitted to the USAID Contracting Officer’s Technical Representative (COTR), formerly known
as CTO, on an annual basis along with the initial EMPR as well as a narrative providing details on the mitigation process. The report should not exceed ten pages (excluding annexes).

C. Initial Environmental Mitigation Report

1. Classification of Level of Risk
Components of a program or discrete activities under an award can have varying levels of risk for environmental damage and therefore require different courses of action (Figure 2). No-risk activities, classified under “i” below, do not require the EMPR as they are already addressed under a “categorical exclusion” determination in the original SO-level IEE and Environmental Threshold Decision at the Mission. High-risk activities (“ii”) will have significant environmental impacts that will require an Environmental Assessment (EA) contracted through the IP with MEO consultation to a professional Environmental Impact organization with final approval by the LAC Bureau Environmental Officer. Such activities are not to be avoided if they meet a crucial need of the community (e.g., solid waste disposal facility, municipal-scale waste water treatment plant). Medium-risk activities (“iii”) will require the IP to screen environmental impacts and plan for mitigation of adverse environmental impacts. It is to these medium-risk activities that this EMPR guidance primarily applies.

Figure 2: Schematic of required action based on the level of risk of a component or discrete activity under an award.

i. Discrete Activities that Do Not Require Mitigation Plans (No-Risk):
An illustrative list of no-risk discrete activities where no mitigation reporting is required includes:

- Education or training*, unless it implements or leads to implementation of actions that impacts the environment (such as construction of schools or use of pesticides),
- Community awareness initiatives,
- Controlled research/demonstration projects in a small area,
- Technical studies or assistance,
- Information transfers.
If there is a risk that the actual implementation of materials learned during training could adversely impact the environment (e.g., training on agricultural techniques), the training is expected to include as part of its curriculum, an analysis of environmental impacts and planning for mitigation.

ii. Discrete Activities that Cannot be Supported (High-Risk):

Under the environmental regulations of USAID, if there is a discrete activity which is considered critical to the needs of the community that may have a significant environmental impact, such activities will require an Environmental Assessment. In the case of pesticide use a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) will need to be prepared by the partner and approved by the USAID Latin America and the Caribbean (LAC) Bureau Environmental Officer (BEO). Such activities include but are not limited to:

- Agricultural, livestock introduction or other activities that involve forest conversion,
- Resettlement of human populations,
- Large water management systems such as dams or impoundments,
- Drainage of wetlands,
- Introduction of exotic plants or animals,
- Permanent modification of the habitat supporting an endangered species,
- Industrial level plant production or processing (this does not include community or regional plant nurseries aimed at restoring areas after fires),
- Installation of aquaculture systems in sensitive lakes, marine waters (not land-based fish ponds),
- Procurement of timber harvesting equipment, including chainsaws,
- Use of pesticides (insecticides, herbicides, acaricides, fungicides),
- Large scale construction in un-degraded land,
- Large scale new construction involving permanent living quarters and/or sanitation facilities,
- Cutting of trees over 20 cm diameter breast height, especially tropical trees, except as needed to control disease or maintain forest health.
- Construction of new roads or upgrading/maintenance of extensive road, fire break or trail systems through un-degraded forest land or natural habitats.

iii. Discrete Activities that can be Supported if Mitigation Measures are Planned and Implemented (Medium-Risk):

Many discrete activities under an agreement will fall between the two extremes mentioned above and offer some adverse environmental impact that can be mitigated with proper planning. For these activities the Implementing Partner (IP) will be responsible for completing the EMPR on an annual basis.
2. Sector-Specific Environmental Screening Form

The Environmental Screening Form contains information relevant to the potential environmental impact over the life of activity to natural resource and communities, local planning permits, and environment and health. If items in the Environmental Screening Form (Appendix 1, Table 1) from Column “A” are checked then items for monitoring and mitigation are to be specified in the “Identification of Mitigation Plan” (Appendix 1, Table 2). The Mitigation Plan simply outlines the plan of action for mitigation of planned activities. The Mission Environmental Officer is to approve these forms, with special attention to those projects with identified impacts (i.e., projects with any check marks in Column A).


C. Annual Environmental Mitigation Report

On an annual basis each implementing partner will submit an “Environmental Mitigation Report” using the attached EMPR Table 3 (Appendix 1). The EMPR contains information relevant to the potential environmental impact over the life of a discrete activity under an award and includes: A) a copy of the initial EMPR completed during the initial project planning (reference section B above); B) the prescribed mitigation measures using the “Identification of Mitigation Plan (Appendix 1, Table 2)”; and C) synthesized data on these mitigation measures collected throughout the year and tracked in the Environmental Monitoring and Evaluation Tracking Table (Appendix 1, Table 3). As it is often difficult to quantitatively measure progress of complex mitigation measures, it is necessary to include inserted digital photos (with relevant maps) to describe progress of mitigation activities.

USAID Mission requires that Implementing Partners clearly demonstrate competence in implementing discrete activities using best management practices which most often will provide the additional benefit of environmental protection. In addition, the mitigation activities should consider the critical importance of integrating gender considerations in all stages of planning, programming, implementation, and monitoring of USAID activities.

Sections of the EMPR include:

1. EMPR Coversheet
2. EMPR Narrative (to be filled out with project specific information)
3. Annexes:
   a. Environmental Screening Form (Table 1),
   b. Identification of Mitigation Plan (Table 2)
   c. Environmental Monitoring and Evaluation Tracking Table (Table 3).
4. Photos, Maps, Level of Effort
Appendix 1:

I. COVERSHEET FOR ENVIRONMENTAL MITIGATION PLAN & REPORT (EMPR)

USAID MISSION SO # and Title: ________________________________

Title of IP Activity: __________________________________________

IP Name: ____________________________________________________

Funding Period: FY_____ - FY_____

Resource Levels (US$): ________________________________

Report Prepared by: Name:_____________________________ Date: __________

Date of Previous EMPR: ___________________ (if any)

Status of Fulfilling Mitigation Measures and Monitoring:

_____ Initial EMPR describing mitigation plan is attached (Yes or No).

_____ Annual EMPR describing status of mitigation measures is established and
attached (Yes or No).

_____ Certain mitigation conditions could not be satisfied and remedial action has been
provided within the EMPR (Yes or No).

USAID Mission Clearance of EMPR:

Contracting Officer’s Technical Representative: ___________ Date: ____________

Mission Environmental Officer: ______________________________ Date: __________ ______________ 

Regional Environmental Advisor: _____________________________ Date: ____________ 

_______________________ (                   )

_______________________ (                   )
II. Environmental Mitigation Plan & Report Narrative

1. **Background, Rationale and Outputs/Results Expected:**

   Summarize and cross-reference proposal if this review is contained therein.

2. **Activity Description:**

   Succinctly describe location, site details, 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. Describe how gender considerations have been incorporated into the activity. How will gender relations affect the achievements of activity results? How will the activity results affect the relative status of men and women?

3. **Environmental Baseline:**

   Describe affected environment, including essential baseline information available for all affected locations and sites, both primary and ancillary activities. Describe how the activity will involve men and women who directly affect the environment. Methodologies for data collection and analysis for gender-sensitive implementation and monitoring of activities are encouraged.

4. **Evaluation of Environmental Impact Potential of Activities (Table 2):**

   As a component of the Identification of Mitigation Plan (Appendix 1, Table 2), describe impacts that could occur before implementation starts, during implementation, 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.

For example, any activity that increases human presence in an area, even temporarily, will increase noise, waste, and the potential for hunting, timbering, etc.

Evaluating the environmental impact potential of activities must include gender-sensitive indicators and sex-disaggregated data when the activities or their anticipated results involve or affect women and men differently; and if so, this difference should be an important factor in managing for sustainable activity impact.

5. Environmental Mitigation Actions (Tables 2 & 3):

For the Initial EMPR: List the mitigation measures in the “Identification of Mitigation Plan” (Table 2) and describe monitoring of these mitigation measures in the “Environmental Monitoring and Evaluation Tracking Table” (Table 3).

For the EMPR: Describe status of complying with the conditions. Examples of the types of questions an IP should answer to describe “status” follow.

1) What mitigation measures have been put in place? How is the success of mitigation measures being determined? If they are not working, why not? What adjustments need to be made?

2) What is being monitored, how frequently and where, and what action is being taken (as needed) based on the results of the monitoring? In some situations, an IP will need to note that the monitoring program is still being developed with intent to satisfy the conditions. Alternatively, it could happen that the conditions cannot be achieved because of various impediments.

6. GENDER

Integrating gender considerations into all stages of planning, programming, and implementation of development assistance is not only a priority for USAID, but also an essential part of effective and sustainable development. The Automated Directive System (ADS) 201 sets out specific requirements to help ensure that appropriate consideration is given to gender as a factor in development planning at the Assistance Objective and the Intermediate Results level of Assistance Objectives all the way down to the activity level. This programming policy includes clear guidance on the procedures for gender integration where determined to be appropriate. In this regard, gender issues must be addressed in procurement documents and evaluation criteria. Gender equality is a USG-wide priority, and USAID has and will continue to take a lead role in that effort. For example, USAID/Environmental Protection Program monitors how men and women will be involved in the process of improving the Dominican Republic's Environmental impact assessment procedures. The Program is documenting gender
participation in all of its activities. Whenever possible, gender based differences in roles, attitudes and concerns should also be documented.
### III-A. Environmental Screening Form (Table 1)

| Name of Activity: | | | | | Column A | Column B | Col C |
|-------------------|-------------------|-------------------|
| Type of Activity: | | | | | Yes | No | If answered yes to Col. A. is it a--? |
| Grantee: | | | | | | | |
| Date: | | | | | | | |

#### IMPACT ON NATURAL RESOURCES & COMMUNITIES

1. Will the project involve construction\(^1\) of any type of structure (building, check dam, walls, etc)?
2. Will the project involve the construction\(^2\) or repair of roads or trails?
3. Will the project involve the use, involve plans to use or training in the use of any chemical compounds such as pesticides\(^3\) (including neem), herbicides, paint, varnish, lead-based products, etc?
4. Involve the construction of repair of irrigation systems?
5. Involve the construction or repair of fish ponds?
6. Involve the disposal of used engine oil?
7. Will the project involve implementation of timber management\(^4\) or extraction of forest products?
8. Are there any potentially sensitive terrestrial or aquatic areas near the project site, including protected areas?
9. Does the activity impact upon wildlife, forest resources, or wetlands?
10. Will the activities proposed generate airborne gases, liquids, or solids (i.e. discharge pollutants)
11. Will the waste generated during or after the project impact on neighboring surface or ground water?
12. Will the activity result in clearing of forest cover?
13. Will the activity contribute to erosion?
14. Is the activity incompatible with existing land use in the vicinity?
15. Will the activity contribute to displace housing?
16. Will the activity affect unique geologic or physical features?
17. Will the activity contribute to change in the amount of surface water in any body?
18. Will the activity deal with mangroves and coral reefs?
19. Will the activity expose people or property to flooding?
20. Will the activity contribute substantial reduction in the amount of ground water otherwise available for public water supplies?
21. Will the activity create objectionable odors?
22. Will the activity violate air standard?

#### ENVIRONMENT & HEALTH

23. Will the project activities create conditions encouraging an increase of waterborne diseases or populations of disease carrying vectors?
24. For road rehabilitation as well as water and sanitation grants, has a maintenance plan been submitted?
25. Will the activity generate hazards or barriers for pedestrians, motorists or persons with disabilities?
26. Will the activity increase existing noise levels?
27. Will the project involve the disposal of syringes, gauzes, gloves and other biohazard medical waste?
28. Is the activity incompatible with existing land use?

#### LOCAL PLANNING PERMITS
<table>
<thead>
<tr>
<th></th>
<th>Does the activity e.g. infrastructure improvements, require local planning permission(s)?</th>
<th>N/A</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>Does the activity meet the national building code (e.g. infrastructure improvements)?</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**GENDER**

<table>
<thead>
<tr>
<th></th>
<th>Do men and women benefit or are involved in the project’s activities?</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>31</td>
<td>Does the project activity inhibit the equal involvement of men and women?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>Are there factors that prevent women’s participation in the project?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**RECOMMENDED ACTION** *(Check Appropriate Action):* *(Check)*

(a) The project has no potential for substantial adverse environmental effects. No further environmental review is required (Categorical Exclusion). No EMPR required.

(b) The project has potential for minimal to medium adverse environmental effects, but mitigable environmental effects. Measures to mitigate environmental effects will be incorporated (Negative Determination with Conditions). EMPR Required.

(c) The project has potentially substantial or significant adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared (Positive Determination). No EMPR required.

(d) The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required (Deferral).

(e) 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.

Construction projects need to be reviewed for scale, planned use, building code needs and maintenance. Some small construction projects, such as building an entrance sign to a park, may require simple mitigations whereas larger buildings will require more extensive review and monitoring.

2 New construction of roads and trails will require a full environmental assessment of the planned construction, i.e. a Positive Determination.

3 The planned involvement of pesticides will trigger the need to develop a Supplemental Initial Environmental Examination that meets USAID pesticide procedures (Pesticide Evaluation Report and Safer Use Action Plan or “PERSUAP”) for the project.

4 Any activities the involve harvesting trees or converting forests will require a full environmental assessment of the activity (i.e. Positive Determination).
**III-B. Identification of Mitigation Plan (Table 2)**

Enter the Question/Row # of the potential negative impacts with check marks in Column A (Table 1) and complete table below for mitigation measures to reduce or eliminate the issue. In the Sub-Activity or Component Column, list the main actions to be implemented. Under each action, list the tasks (Steps) that are needed to implement this action.

<table>
<thead>
<tr>
<th>#</th>
<th>Sub-activity or component</th>
<th>Description of Impact</th>
<th>Mitigation Measures</th>
</tr>
</thead>
<tbody>
<tr>
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<td>Component 1</td>
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<tr>
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<td>Step 1</td>
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<td>Step 2</td>
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<td>Step 3</td>
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<td>2</td>
<td>Component 2</td>
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</tr>
<tr>
<td></td>
<td>Step 3</td>
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</tbody>
</table>

* provide overview of measures used from the USAID LAC Environmental Guidelines or other pertinent guidelines, details on exact monitoring plan are illustrated in Table 3, Environmental Monitoring and Evaluation Tracking Table.
### III-C. Environmental Monitoring and Evaluation Tracking Table (Table 3).

<table>
<thead>
<tr>
<th>#</th>
<th>Description of Mitigation Measure</th>
<th>Responsible Party</th>
<th>Monitoring Methods</th>
<th>Estimated Cost</th>
<th>Results</th>
<th>Recommended Adjustments</th>
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<tr>
<td></td>
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<td>Indicators Methods Frequency</td>
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<td></td>
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<td>3</td>
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</tr>
</tbody>
</table>
Clearance Page for IEE- UWI/CCDC DGP-5 Transitional Living Program for Children in State Care Program:

Approval: ___________________________ Date: ___________________________
Denise A. Herbol
Mission Director
USAID/Jamaica

Concurrence: ___________________________ Date: ___________________________
Malden Miller
Mission Environment Officer
USAID/Jamaica

_________________________
Paul Schmidtke
Regional Environmental Officer (REA)
LAC/CAR

Clearance: ___________________________ Date: ___________________________
Claire Spence
Acting Director, Office of Citizen Security

_________________________
Suzanne Ebert
Director, Office of Environment & Health

_________________________
Jeannette Vail
Supervisory Program Officer

Prepared by: ___________________________ Date: ___________________________
Claudette Anglin
Project Management Specialist (DGP)
Clearance Page for IEE- UWI/CCDC DGP-5 Transitional Living Program for Children in State Care Program:

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Mission Director  
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Date: 6-4-2014

Concurrence: 
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Date: 4-9-2014

via email  
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Clearance:  
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Prepared by: Claudette Anglin  
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Date: 4-9-2014