LAC-IEE-16-56

ENVIRONMENTAL THRESHOLD DECISION
For Amendment 1 of LAC-IEE-15-30 El Salvador DG Office

Activity Location: El Salvador
Activity Title: Crime and Violence in Targeted Municipalities Reduced
Activity Number: 519-0468
Life-of-Activity Funding: $155 million
Life-of-Activity: FY 2013 – FY 2018
IEE prepared by: Dorita de Gutiérrez, Strategic Development Office
Margarita Lobo, Democracy and Governance Office
Reference ETDs: LAC-IEE-15-30
Date: September 7, 2016
Recommended Threshold Decision: Categorical Exclusion
Negative Determination with Conditions

Bureau Threshold Decision:

Purpose and Scope:
The purpose of this Initial Environmental Examination and Threshold Decision (IEE/ETD) is to amend LAC-IEE-15-30 to include activities for this Project particularly under Sub-Purpose 1 “Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased”, Output 1.3 “Civil society engagement to prevent crime and violence increased”. SolucionES Activity, which is a Global Development Alliance (GDA), is facilitating the rehabilitation plans of Parque Cuscatlán and Castillo Venturoso, two landmark family recreational spaces in San Salvador. For this purpose, SolucionES will fund the design and environmental assessment (EA), via USAID funds, for the renovation of the Parque Cuscatlán, as well as electrical, hydraulic, and architectural studies for the rehabilitation. The actual rehabilitation of these public recreational spaces that includes infrastructure demolition, construction, and restoration, will be done in the
future through a multi-sector effort funded by the San Salvador Mayor’s office, the private sector, and civil society. As the renovation of the Parque Cuscatlán requires an EA by the Ministry of Environment of El Salvador, and the EA will provide alternatives for improvement of the original design, USAID agreed to provide funding to SolucionES to prepare the EA. USAID will not fund any construction/renovation. All other terms and conditions remain in full force and effect.

**Environmental Threshold Determination**

A **Categorical Exclusion** is issued to the Crime and Violence in Targeted Municipalities Reduced Activity for the following Sub-Purposes and Outputs that do not include a grant/sub-grant component nor small-scale rehabilitation or reconstruction.

- **Sub-Purpose 1: Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased**
  - Output 1.1: Key institutions’ capacity to prevent violence and crime strengthened.
  - Output 1.2: Innovative approaches to build resilient communities expanded.
  - Output 1.3: Civil society engagement to prevent crime and violence expanded.

  *For amendment:* (iii) Analyses, studies, academic or research workshops and meetings (EA, design, and studies for Castillo and Parque Cuscatlán. NOTE: special condition includes that the organizations/donors that are doing the actual renovations will use the EA direction and mitigation measures for the final construction actions that they will conduct. USAID will not fund any construction/renovation actions.

- **Sub-Purpose 2: Community Policing in High Risk Municipalities Expanded**
  - Output 2.1: Community policing incentives and legal frameworks developed.
  - Output 2.2: Community service of the police institution improved.

- **Sub-Purpose 3: Youth Access to Quality Education Opportunities Increased**
  - Output 3.1: Key institutions capacity to improve education outcomes strengthened;
  - Output 3.2: Access to education and job opportunities for youth established.
  - Output 3.3: Youth development opportunities through alliances expanded.

This Categorical Exclusion is issued according 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;

(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 Crime and Violence in Targeted Municipalities Reduced for grant or sub-grant components, and rehabilitation or small-scale construction components of the following Sub-Purposes and Outputs:

- **Sub-Purpose 1: Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased**
  - Output 1.1: *Key institutions’ capacity to prevent violence and crime strengthened.*
  - Output 1.2: *Innovative approaches to build resilient communities expanded.*
  - Output 1.3: *Civil society engagement to prevent crime and violence increased.*

- **Sub-Purpose 2: Community Policing in High Risk Municipalities Expanded**
  - Output 2.2: *Community service of the police institution improved.*

- **Sub-Purpose 3: Youth Access to Quality Education Opportunities Increased**
  - Output 3.1: *Key institutions capacity to improve education outcomes strengthened*;
  - Output 3.2: *Access to education and job opportunities for youth established*;
  - Output 3.3: *Youth development opportunities through alliances expanded.*

Conditions include the following:

a) The implementing partner will prepare an Environmental Mitigation and Monitoring Plan (EMMP) for each sub-grant, grant, infrastructure rehabilitation or small-scale construction activity describing how it will, in specific terms, implement all environmental mitigation measures described in the plan and monitor their effectiveness. Guidance on preparation of the EMMP will be provided to the implementing partner as part of the Request for Proposals. Existing awards with existing EMPR/EMMP shall update/revise their document to follow the new EMMP format.

b) Integrate a completed EMMP into the initial work plan.

c) Integrate an EMMP into subsequent Annual Work Plans, making any necessary adjustments to activity implementation in order to minimize adverse impacts to the environment. The EMMP shall be prepared or updated on an annual basis based on the Annual Work Plans.

d) All EMMPs shall be reviewed and approved by the AOR/COR, MEO, and REA before implementation of the actions (small-scale construction/rehabilitation) can be implemented.

e) EMMPs shall be monitored by the Implementing Partner using Table 3 of the EMMP on a regular basis as per listed on the EMMP Table 3. COR/AOR/, MEO, and REA shall conduct spot check monitoring of the EMMP mitigation measures effectiveness and implementation together with the Implementing Partner.

f) EMMP Monitoring Reports shall be prepared and submitted to the AOR/COR and MEO as per the contract terms for reporting. A final annual EMMP Monitoring Report shall be
officially submitted to the AOR/COR, MEO, and REA for review and approval. Table 3 of the EMMP shall be used to compile mitigation measure monitoring results. See the EMMP instructions attached to the EMMP for more details on the EMMP process.

g) Each grant, sub-grant, rehabilitation, or small-scale construction activity supported by shall be required to have an approved EMMP prior to implementation of the grant/sub – grant activities. The main Implementing Partner, AOR/COR, and MEO are responsible to review and approve the grants/sub-grants.

h) Follow the Minister of Environment and Natural Resources guidelines for specific activities such as those established through the Ley de Medio Ambiente (Decreto Legislativo, Diario Oficial No. 339, Tomo No. 3553, 4 de mayo de 1998) and its Regulations (Decreto Legislativo No. 17, 21 de marzo de 2000, Diario Oficial No. 73, Tomo No. 347, 12 de abril de 2000, y sus reformas Decreto Legislativo No. 581, 18 de octubre de 2001 y Diario Oficial No. 206, Tomo No. 353, 31 de octubre de 2001).

i) Follow the Municipal Building guidelines already approved by USAID within the USAID Sectoral Environmental Guidelines, sections on Small-scale Construction and Solid Waste http://www.usaidgems.org/sectorGuidelines.htm

j) If any large scale (over 1000 sq. meters) construction or actions not covered in this IEE that might cause environmental impacts are to be supported by this activity, an approved amended Initial Environmental Examination is required before these actions can be undertaken.

Responsibilities

• Each activity manager or Contracting/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.

• It is the responsibility of the Development Objective (DO) Team to ensure that environmental compliance language from the ETD is added to procurement and obligating documents, such as activity-related Strategic Objective Grant Agreements (SOAGs) and Modified Acquisition and Assistance Request Documents (MAARDs).

• The AOR/COR and the Mission Environmental Officer (MEO) 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 assign a qualified environmental expert to be responsible for environmental compliance and 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.

Environmental Compliance Language for Contracts

Each technical office, along with the REA, will ensure that environmental compliance language from this IEE is included in all procurement and obligating documents, such as activity-related Development Objective Agreements, and under Global Acquisition and Assistance Systems (GLAAS). The following language regarding environmental compliance will be included in any kind of procurement instrument within this Activity:

Categorical Exclusion and Negative Determination Only. “The Foreign Assistance Act of 1961, as amended, Section 117 requires that the impact of USAID’s activities on the environment be considered and that USAID include environmental sustainability as a central consideration in designing and carrying out its development programs. This mandate is codified in Federal Regulations (22 CFR 216) and in USAID’s Automated Directives System (ADS) Parts 201.5.10g and 204 (http://www.usaid.gov/who-we-are/agency-policy/series-200), which, in part, require that the potential environmental impacts of USAID-financed activities are identified prior to a final decision to proceed and that appropriate environmental safeguards are adopted for all activities. [Offeror/applicant/contractor/recipient] environmental compliance obligations under these regulations and procedures are specified in the following paragraphs of this [RFP/RFA/contract/task order/grant/cooperative agreement].

In addition, the contractor/recipient must comply with host country environmental regulations unless otherwise directed in writing by USAID. No action funded under this [contract/task order/grant/CA] will be implemented unless an environmental threshold determination, as defined by 22 CFR 216, has been reached for that activity, as documented in a Request for Categorical Exclusion (RCE), Initial Environmental Examination (IEE) duly signed by the Bureau Environmental Officer (BEO).

As part of its initial Work Plan, and all Annual Work Plans thereafter, the contractor/recipient, in collaboration with the USAID COR/AOR and REA or BEO, as appropriate, shall review all ongoing and planned activities under this [contract/task order/grant/CA] to determine if they are within the scope of the approved Regulation 216 environmental documentation.

At least one Negative Determination with Conditions, with sub-awards. An Initial Environmental Examination (IEE) [(insert IEE # or hyperlink, if available)] has been approved for [the Activity] funding this [RFA/RFP/contract/task order/grant/cooperative agreement (CA)]. The IEE covers activities expected to be implemented under this [contract/task order/grant/CA]. USAID has determined that a Negative Determination with Conditions applies to one or more of the proposed actions. This indicates that if these actions are implemented subject to the specified conditions, they are expected to have no significant adverse effect on the environment. The [offeror/applicant/contractor/recipient] shall be responsible for implementing all IEE conditions pertaining to actions to be funded under this [solicitation/award].
As part of its initial Work Plan, and all Annual Work Plans thereafter, the contractor/recipient, in collaboration with the USAID COR/AOR, and REA or BEO, as appropriate, shall review all ongoing and planned actions under this [contract/task order/grant/CA] to determine if they are within the scope of the approved IEE.

If the contractor/recipient plans any new actions outside the scope of the approved IEE, the contractor/recipient shall inform USAID in writing of these changes. No such new actions shall be undertaken prior to receiving written USAID approval.

When the approved IEE contains one or more Negative Determinations with Conditions, the contractor/recipient shall:

- Prepare an environmental mitigation and monitoring plan (EMMP) for each proposed action under the Negative Determination with Conditions in the IEE, describing how the contractor/recipient will, in specific terms; implement all IEE conditions that apply within the scope of the award. The EMMP format is attached. The EMMP shall include monitoring the implementation of the conditions and their effectiveness.
- Integrate a completed EMMP into the initial work plan.
- Prepare an Environmental Compliance Report (ECR) at the end of the year or as per reporting requirements of the contract. The ECR shall be based on the monitoring of mitigation measures using Table 3 of the EMMP.
- A revised EMMP must be completed and approved in subsequent Annual Work Plans, making any necessary adjustments to implementation in order to minimize adverse impacts to the environment.

A provision for sub-awards is included under this award. Therefore, the contractor/recipient will prepare an EMMP for each proposed sub-award, except those that qualify for a categorical exclusion. In the case of a categorical exclusion, the contractor/recipient shall complete and submit for USAID approval table 1 of the EMMP (Environmental Review Form- ERF). In order to ensure the funded proposals will result in no adverse environmental impacts. Implementation of sub-awards shall not begin prior to USAID written approval of the corresponding EMMP. The contractor/recipient is responsible for ensuring that mitigation measures specified in the EMMP are implemented.”

Contract Officers will use documents listed in ADS 204.5 “Environmental Compliance: Language for Use in Solicitations and Awards; An Additional Help for ADS Chapter 204” dated May 19, 2008. ).

Amendments

- Amendments to Initial Environmental Examinations (IEEs) shall be submitted for LAC Bureau Environmental Officer (BEO) approval for any activities not specifically covered in the IEE, which include:
  - Funding level increase beyond ETD amount,
- Time period extension beyond ETD dates (even for no cost extension), 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 may require the need to conduct an Environmental Assessment (EA) and approval of this document by the LAC BEO could require an annual evaluation for environmental compliance.

The attached IEE has been revised to reflect this amendment and as such it replaces the original IEE (LAC-IEE-15-30) in its entirety. All requirements and conditions of this ETD and the attached IEE shall be fully implemented.

Signed

Date 01/27/16

Diana Shannon
Bureau Environment Officer
Bureau for Latin America and the Caribbean

Copy to: Larry Sacks, Acting Mission Director
         Adam Schmidt, DMD
         Norma Velazquez Castro, SDO
         Mary Rodríguez, MEO
         Dorita de Gutiérrez, SDO
         Margarita Lob, DG
         Joe Torres, REA

Copy to: Eric Kite, Dora Plavetic, Mileydi Guilarte,
         LAC/OLA
         Geeta Utl, Jessica Rosen, LAC/RSD

Attachments:
- Initial Environmental Examination

File Locations:
LAC Bureau- P:\LAC.RSD.PUB\ENV\Reg 216\IEE\IEE16
Environmental compliance database-this document will be posted to the environmental compliance database at http://gemini.info.usaid.gov/egat/envcomp/index
Amendment #1 to Initial Environmental Examination LAC-IEE-15-30 of Crime and Violence in Targeted Municipalities Reduced Project No. 519-0468

Drafted by:
MEO/EG: Mary de Rodríguez
SDO: Dorita de Gutiérrez
SDO: Norma Velásquez-Castro

Date: 09/19/2016
Date: 09/14/2016
Date: 09/14/2016

Cleared by:
DG: Margarita de Lobo
DG: Adam Schmidt
REA: Joe Torres
SDO: Greg Swarin
DMD: Kim Delaney

by e-mail attached

Date: 09/21/2016
Date: 09/20/2016
Date: 09/20/2016
Date: 09/20/16

Recommended for Approval:
Lawrence J. Sacks, MD

Date: 9/21/16

P:\sdo.pub\sdopub\04 TECHNICAL AREAS\DO 1 SECURITY 2013-2017\IIE\PROJECT 519-0468\AMEND #1\LAC-IEE-15-30 Amendment #1 (ES - Crime and Violence in Targeted Municipalities Reduced) (4).docx
Re: IEE-IEE-15-30 Amend #1 (DG Crime and Violence Prevention Project)

1 message

Fri, Sep 9, 2016 at 9:13 AM

Joe Torres <jtones@usaid.gov>

To: Dora Gutierrez <dgutierrez@usaid.gov>
Cc: Mary Rodriguez <mrodriguez@usaid.gov>, "Velasquez-Castro, Norma (San Salvador/SDO)" <nvelasquez-castro@usaid.gov>, Margarita Lobo <mlobo@usaid.gov>

This email serves as my clearance for Amendment 1 of LAC-IEE-15-30 to add new actions to IR 1.3. These actions fall within Categorical Exclusions and thus no additional actions are required other than the following Condition:

USAID and Solutions ES will work with the donors and organizations conducting the construction/renovations to ensure that the Environmental Assessment direction and mitigation measures are implemented during construction.

Joe Torres
September 20, 2016

Joe Torres
Regional Environment Advisor-Central America and Mexico
USAID/USDA Forest Service PASA
jtones@usaid.gov
office phone: 503-2601-3335
cell phone: 503-7889-2513
INITIAL ENVIRONMENTAL EXAMINATION (IEE)
Amendment No. 1 of Threshold Decision No. LAC-IEE-15-30

Project Location: El Salvador

Project Title and Number: Crime and Violence in Targeted Municipalities Reduced, No. 519-0468

Development Objective (DO) Title and Number: DO 1 Citizen Security and Rule of Law in Targeted Areas Improved, No. 519-0468
IR 1.2 Crime and Violence in Targeted Municipalities Reduced

Life- of-Project Funding: $155,000,000

Life of Project: FY 2013 – FY 2018

Reference Threshold Decision: LAC-IEE-15-30

IEE Prepared by: Dorita de Gutiérrez, Strategic Development Office
Margarita Lobo, Democracy and Governance Office

Date Prepared: September 7, 2016

REO/MEO Recommended Threshold Decision: Categorical Exclusion; Negative Determination with Conditions
Purpose and Scope of IEE Amendment

The purpose of this IEE is to amend LAC-IEE-15-30 to include activities for this Project particularly under Sub-Purpose 1 “Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased”, Output 1.3 “Civil society engagement to prevent crime and violence increased”. SolucionES Activity, which is a Global Development Alliance (GDA), is facilitating the rehabilitation plans of Parque Cuscatlán and Castillo Venturoso, two landmark family recreational spaces in San Salvador. For this purpose, SolucionES will fund the design and environmental assessment (EA), via USAID funds, for the renovation of the Parque Cuscatlán, as well as electrical, hydraulic, and architectural studies for the rehabilitation. The actual rehabilitation of these public recreational spaces that includes infrastructure demolition, construction, and restoration, will be done in the future through a multi-sector effort funded by the San Salvador Mayor’s office, the private sector, and civil society. As the renovation of the Parque Cuscatlán requires an EA by the Ministry of Environment of El Salvador, and the EA will provide alternatives for improvement of the original design, USAID agreed to provide funding to SolucionES to prepare the EA. USAID will not fund any construction/renovation. All other terms and conditions remain in full force and effect.

1. BACKGROUND AND PROJECT DESCRIPTION

USAID/El Salvador Country Development Cooperation Strategy (CDCS) (FY 2013-FY 2017) was approved by the Assistant Administrator for the Bureau of Latin America and the Caribbean on September 19, 2013. The CDCS last year of obligation is FY 2017 and last year of implementation is FY 2018 and it includes two Development Objectives (DO): DO1: Citizen Security and Rule of Law in Targeted Areas Improved, and DO2: Economic Growth Opportunities in Tradables Expanded.

DO1, to which this Project “Justice, Transparency, and Accountability” directly contributes, includes the following Intermediate Results (IRs): IR1.1: Justice, Transparency and Accountability in Key Institutions Improved and IR1.2: Crime and Violence in Targeted Municipalities Reduced.

1.1 Purpose and Scope of IEE

In accordance with ADS 201.3.11 a “project” is defined as a set of executed interventions, over an established timeline and budget intended to achieve a discrete development result through resolving an associated problem. It is linked to the CDCS Results Framework. More succinctly, a project is a collaborative undertaking with a beginning and end, designed to achieve a specific purpose. Also, it requires that all projects must address relevant environmental safeguards and impact in a manner consistent with relevant findings of the mandatory, country-level Tropical Forest and Biodiversity analysis (as in FAA 118/119) developed to inform the CDCS. In addition, ADS 201.3.15 requires that each PAD includes as an Annex the approved IEE for the project.

The purpose of this new IEE is to analyze the potential environmental impacts proposed under the CDCS’ DO1, Crime and Violence in Targeted Municipalities Reduced Project (the Project)

The Total Estimated Cost of the Crime and Violence in Targeted Municipalities Reduced Project is $155 million and its end date is September 30, 2018.

Current activities under implementation were authorized under previous IEEs (LAC-IEE-14-56 and LAC-IEE-14-29). This IEE incorporates the following ongoing activities presently covered under LAC-IEE-14-56, as they are continuing into the Project: (1) Crime and Violence Prevention (CVP), (2) SolucionES, (3) Justice Sector Strengthening (community policing), (4) Education for Children and Youth, (5)

1.2 Background

The Project purpose is to focus on a comprehensive approach to crime and violence prevention. To achieve this purpose, the Project will help improve citizen security by increasing crime prevention at the local level in high risk municipalities, expanding community policing and effectiveness of the police in preventing crime within communities, and increasing access for at-risk youth to quality education opportunities and employment. Through this approach, it is expected that fewer youth will join gangs, crimes will be reported, evidence will be obtained by the authorities in a more timely and effective manner, and violence and crime will be reduced. This Project purpose will be accomplished through the achievement of three Sub-Intermediate Results (Sub-IR) – hereby called Sub-Purposes – which are directly linked to IR1.2: Sub-Purpose 1 (Sub-IR 1.2.1), Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased, Sub-Purpose 2 (Sub-IR 1.2.2), Community Policing in High Risk Municipalities Expanded, and Sub-Purpose 3 (Sub-IR 1.2.3), Youth Access to Quality Education Opportunities Increased.

The Project is aligned with: (a) the goals of the Partnership for Growth (PFG) Joint Country Action Plan (JCAP) to help address crime and insecurity constraint; (b) the Central America Regional Security Initiative (CARSI); (c) the goals of the Central America Citizen Security Partnership; (b) goal three of the USAID’s Education Strategy “Increased Equitable Access to Education in Crisis and Conflict Environments”; and (e) the USG National Security Council (NSC) Central America Strategy (CEN). The Project contributes directly to Intermediate Result (IR) 1.2, Crime and Violence in Targeted Municipalities Reduced under CDCS DO 1, Citizen Security and Rule of Law in Targeted Areas Improved.

1.3 Description of Sub-Purposes and Illustrative Activities

Sub-Purpose 1: Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased

Sub-Purpose 1 will be realized through advances in the following Outputs:

1. Key institutions’ capacity to prevent violence and crime strengthened
2. Innovative approaches to build resilient communities expanded
3. Civil society engagement to prevent crime and violence increased

Output 1.1. Key institutions’ capacity to prevent violence and crime strengthened

Illustrative Interventions

- Provide support to improve key GOES institutions’ ability to implement emerging laws and policies on crime and violence prevention.
- Provide technical assistance to municipal governments to establish and strengthen Municipal Crime and Violence Prevention Committees according to national strategies, laws and policies.
- Assist targeted municipal governments to elaborate crime and violence diagnostics of their communities to identify the challenges they need to reduce crime and violence and through this process be more responsive to citizen’s concerns.
- Facilitate dialogue and confidence building efforts between National Civilian Police and municipal crime prevention planning in order to enhance coordination and build trust among critical municipal, community and national security partners.
• Support the development of municipal-led prevention plans with input from the community, establish priority interventions, and implement prevention models, including the establishment of outreach centers and youth-oriented activities to prevent crime and violence. **Activities may include small scale renovation/rehabilitation of facilities for these centers.**

• Capacity building and support to establish and strengthen municipal crime prevention observatories, including cluster observatories to serve several municipalities and strengthen mapping and tracking systems to inform policy and program implementation. Initiatives to create municipal crime observatories can also establish protocols with GOES institutions to track several crimes and develop policies that address, among others, the specific needs of youth, women and girls.

• Assess and promote comparative best practices and approaches across key institutions, including regional exchanges e.g. with Colombia, Brazil, Chile, Mexico and sharing of expertise with the US.

• Working with key institutions including governmental entities, on strategic planning and institutional strengthening will provide ideal opportunities to engage counterparts on gender issues and help them develop improved gender equity policies.

• Initiatives to work closely with municipal committees will support interventions to create and/or strengthen their respective Municipal Gender Units to address gender violence or identify other action plans that will integrate gender into community activities.

• Strengthen key GOES institutions to effectively provide the required services needed to protect migrants and mitigate displacement.

• Support civil society organizations (CSOs) (including non-governmental organizations, professional associations, faith-based organizations, and youth movements against violence) efforts **through grants/sub-grants and technical assistance to engage in crime and violence prevention initiatives.**

---

**Output 1.2. Innovative approaches to build resilient communities expanded**

**Illustrative interventions**

• Support both geographic and technical expansion of municipal-led crime and violence prevention efforts including the replication of a community-based outreach center model for at risk youth; and identify and expand innovative approaches to crime and violence prevention, across high risk municipalities. **Activities may include small scale renovation/rehabilitation of facilities for these centers.**

• Identify and develop a flexible mechanism to pilot successful crime prevention innovative approaches.

• Promote secondary prevention activities including workforce development for at-risk-youth, and promotion of best practices including the YSET tool, cure violence model, and alcohol and drug prevention.

• Support tertiary prevention interventions to rehabilitate and assist in initiatives that encourage youth and provide alternatives to move away from a life of crime and gang activity. This will involve replicating best practices in tertiary prevention and forging strong alliances with the private sector to get youth previously involved in criminal activity engaged in more productive alternatives.

• Promote the Place Based Approach to coordinate inter-agency investments in target geographic areas.

• Promote institutional strengthening for service provision, **through grants/sub-grants and technical assistance,** especially in the area of child protection, to ensure adequate care, reintegration services and protection of children and vulnerable populations (people with disabilities, rural, indigenous, children, and Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) populations), and increase capacity of child protective services at the community level.
• Improve monitoring to ensure child protection laws and rights are upheld.
• Promote information and media awareness campaigns to build pride in El Salvador.
• Identify, document and replicate innovative ideas and best practices from across the region and the US to reduce crime and violence.
• Conduct surveys and analysis, publish and disseminate research to effectively measure impact and inform decision-making on crime and violence data.
• Assess and promote comparative best practices and approaches across key institutions to reduce crime and violence, including regional exchanges e.g. with Colombia, Brazil, Chile, Mexico and sharing of expertise with the US.

Output 1.3. Civil society engagement to prevent crime and violence increased

Illustrative interventions:

• Engage business leaders to promote and expand social investment for crime and violence prevention in selected communities.
• Disseminate and generate awareness of best practices for social investment on crime and violence prevention.
• Provide small grants/sub-grants to support organizations and institutions addressing crime and violence prevention. Activities may include small scale renovation/rehabilitation of recreational spaces.
• Build local capacity of civil society organizations to address crime and violence prevention.
• Provide workshops for media to inform journalists of different methodologies, approaches, models, and terminology used for addressing crime and violence prevention.
• Provide small grants/sub-grants or technical assistance to strengthen civil society engagement and advocacy capacity for the rights of victims of crime and to enhance human rights protection and victim’s advocacy as part of crime prevention initiatives. This will include advocacy for the rights of vulnerable populations including displaced populations, women, children and youth affected by violence and insecurity, people with disabilities, rural, indigenous, and LGBTI populations.
• Build civil society capacity to address violence against women by supporting activities dedicated to gender violence, including dissemination of the Special Integral Law for a Life Free of Violence Against Women, preventing domestic violence, reducing early pregnancy.
• Promote responsible gender-sensitive publicity by the private sector.
• Promote gender-focused activities (workshops, assistance, etc.) in companies through Corporate Social Responsibility.
• Facilitate rehabilitation plans (e.g. Environmental Assessment, studies, and designs) of recreational spaces. Actual construction is to be funded with leveraged funds from the private sector, civil society, and local governments to increase their social investments in violence and crime prevention efforts. USAID will not provide funding for any rehabilitation/renovation for these areas.
• Conduct preliminary electrical, hydraulic, and architectural studies in Parque Cuscatlán and Castillo Venturoso, located in San Salvador.
• Support the plan and design of Parque Cuscatlán remodeling, including:
  » The internal pathways.
  » Construction of aerial walkways.
  » Construction of an amphitheater.
  » Expansion of the National Art Gallery.
  » Construction of the civic education center for youth and children.
  » Expansion of the children’s Tin Marin Museum
Sub-Purpose 2: Community Policing in High Risk Municipalities Expanded

Sub-Purpose 2 will be realized through advances in the following Output:

1. Community service of the police institution improved.

Output 2.1. Community policing incentives and legal frameworks developed

Illustrative interventions

- Support the Police to develop indicators that measure efficiency or success based on the new community policing model (i.e. increase trust in the police).
- Support the police in developing institutional tracking systems that measure the successful deployment and specific activities of a community policing approach.
- Review the Police Career Law to introduce incentives for promotions based on the capacity of police officers to participate and engage in community policing implementation and operationalization.
- Review policies, institutional structures, and decision making processes to guarantee that PNC leadership formally incentivizes a community policing approach within the institution.
- Promote best practice exchanges and trilateral cooperation between El Salvador and other countries in the region (e.g. Brazil, Chile, and Colombia) and the US to introduce successful mechanisms, practices, and to revise the legal frameworks that strengthen the institutionalization of community policing.
- Advocate for incentives that enhance receptivity to community policing models, especially of local municipal governments.
- Support the National Police Academy to provide training based on the community policing model to new entrants, complete training based on this model to the entire police force and follow up courses for active police officers.
- Review and improve the curricula of the National Police Academy to ensure that the community policing philosophy is part of the guiding principles for all courses offered.
- Strengthen coordination with other USG agencies for the implementation of the Place Based Approach and Community Policing interventions.

Output 2.2 Community service of the police institution improved

Illustrative interventions

- Provide technical assistance to the police in the expansion of the community policing model.
- Provide specialized leadership training to police officers that offer them with important skills necessary to implement the community policing model (i.e. communication skills, problem solving, team work, human rights, change-management theory).
- Create a cadre of trainers on community policing that will support the institutionalization of this approach.
- Provide assistance to carry out activities that will facilitate community interaction and engagement with the police. Technical assistance will also promote collaboration among the National Civilian Police, municipal officials, and community organizations to draft community based security action plans to prevent and address crime.
- Support revision of management processes and practices in key units of the Police that will improve efficiency and a more service oriented approach.
- Support strengthening capacity of the police in areas such as forensics, investigations, and other internal procedures.
Provide assistance to the police to expand services (e.g. gender violence, child abuse, etc.) to victims including for vulnerable populations such as people with disabilities, rural, indigenous, children, and LGBTI, through specialized units within police delegations outside of the metropolitan area. Activities may include small scale renovation/rehabilitation of victims’ centers in police units.

Ensure the community policing model and framework includes a gender component, including assistance to victims of domestic and gender violence.

Support the police and communities in monitoring the implementation of laws that protect women from violence, such as the Law Against Domestic Violence (LCVI) and the new Special Integral Law for a Life Free of Violence Against Women (LEIV). Utilize victim’s assistance centers in police units to comply with the requirements of the LCVI and LEIV.

Provide grants/sub-grants to CSOs to support public education to address groups with specific needs, such as people with disabilities, young women at risk of domestic violence, and youth at risk in municipalities where the community policing activities are developed.

Sub-Purpose 3: Youth Access to Quality Education Opportunities Increased

Sub-Purpose 3 will be realized through advances in the following Outputs:

1. Key institutions’ capacity to improve education outcomes strengthened
2. Access to education and job opportunities for youth established
3. Alliances for youth development established

Output 3.1. Key institutions’ capacity to improve education outcomes strengthened

Illustrative interventions

- Provide support to Ministry of Education (MOE) to expand the Full Time Inclusive School approach and other education priorities, including after-school activities.
- Provide technical support to MOE as appropriate in the implementation of the new education plan and the systematization of key initiatives that strengthen the quality of education.
- Develop and implement in conjunction with MOE a plan to support safe school environments in target schools, which includes violence prevention and also provides effective counseling, mediation, and positive role-modeling.
- Involve parents and community stakeholders in providing safe learning environments (conflict resolution, anti-bulling, mediation) through school-parent programs and municipal violence prevention committees.
- Provide training to teachers and principals of public schools to develop capabilities for more interactive, meaningful, and relevant instruction with special emphasis in literacy and numeracy and to include a mentoring program and remedial instruction, based on pedagogical strategies tailored to the 12-15 year old age group.
- Provide capacity building to key local organizations and MOE to strengthen organizational, educational, and administrative capability.
- Increase capacity within the Ministry and key local organizations to provide flexible learning mechanisms for out-of-school youth that offer these youth access to complementary learning activities designed to either reintegrate young women and men back into a formal school setting or earn an equivalent primary or secondary school diploma.
- Develop and pilot innovative programs in the lower secondary grades to improve retention and reduce dropouts including youth leadership, life skills, conflict resolution, and workforce readiness and entrepreneurial skills.
- Train teacher, parents and Ministry of Education Administrators to include inclusive education strategies to increase awareness of gender equality and inclusiveness in the school system.
• Develop surveys and analysis tools to understand the impact of violence in schools, drop-out rates, NINIS, and other factors that impact on the quality of education.
• **Leverage with the private sector additional funds for the provision of books and educational materials for schools and for school repairs.**

**Output 3.2. Access to education and job opportunities for youth established**

**Illustrative Interventions**

• Support MOE and the Instituto Salvadoreño de Formación Profesional (INSAFORP) to implement a demand-driven curricula in vocational/technical education to better match private sector needs, improve learning conditions for youth, boost participation of vulnerable populations such as people with disabilities, rural, indigenous, children, and LGBTI.
• Promote access to existing formal and non-formal vocational and technical training in high risk municipalities.
• Strengthen curriculum of technical training institutions to improve access to job training for at-risk youth.
• Develop and implement a plan for youth to return to formal schooling or to complete a lower secondary education diploma. **These activities may be implemented through grants/sub-grants.**
• Provide academic reinforcement focused on literacy, math and basic skills through after-school programs for young women and men who left school before completing 9th grade in order to support obtaining a diploma or reintegrating into formal school.
• Provide additional life skills training (team building, effective communications, leadership, conflict resolution) for out of school youth.
• Develop and expand technical, vocational and other skills training programs linked to the job market. **Activities may include small scale renovation/rehabilitation of training spaces.**
• Ensure that vocational programs provide equal access and also encourage women and men to build non-traditional labor skills. The vocational programs can be expanded to ensure young women are competitive in the labor market across a wide variety of skill sets.
• Create a merit-and-need based scholarship program for at-risk youth to attend technical vocational learning in formal (national system and private) and non-formal settings (other vocational centers).
• **Provide grants/sub-grants to promote the participation of at-risk youth with additional vulnerabilities,** such as repatriated minor immigrants, youth with disabilities, young mothers, and indigenous populations in training programs and foster equitable participation of both male and female youth.
• Provide technical assistance to MOE and INSAFORP to incorporate the needs of these vulnerable populations (people with disabilities, rural, indigenous and children) in curricula development.
• Strengthen coordination with existing donor and international organization’s initiatives, in particular the Millennium Challenge Corporation (MCC), and World Bank, which are directly complementing USAID activities.

**Output 3.3. Youth development opportunities through alliances expanded**

**Illustrative Interventions**

• **Leverage private sector funds to improve the quality of education, improve infrastructure, provide training and carry out youth-related activities.**
• Strengthen the link with the private sector to increase opportunities for job placements including internships and apprenticeships.
• Identify and leverage other donor and local organizations/foundations to expand youth development services. **These activities may be implemented through grants/sub-grants.**
• Expand the network of public-private alliances in education and youth development.
• Provide job placement services for at-risk youth in close coordination with the private sector and Ministry of Labor, and improve existent labor market information systems to better match skills with private sector needs.
• Promote benefits for private sector that the “My first Job” Law offers, in order to increase job opportunities for vulnerable youth. Stimulate the use of the law that requires employing people with disabilities in order to increase access of this population to decent-paying jobs.
• Review legislative framework for My First Job Law to improve incentives for employers to increase job opportunities for youth.
• Strengthen partnerships with the private sector to improve learning conditions for students, and boost participation of vulnerable populations such as girls, people with disabilities, rural, indigenous, and LGBTI.
• Engage civil society organizations in establishing training centers that provide targeted leadership skills for youth to create a cadre of young leaders who could potentially become critical actors and are able to influence social and political changes.

**Project Performance Evaluation**

In addition to monitoring, the Mission also plans to use evaluations to make periodical checks on the performance of its interventions and results. According to the USAID Evaluation policy, each Mission is required to conduct at least one evaluation of each large project it implements. This Project is the largest project in DO 1; therefore the Project Design Team will conduct one performance evaluation through contribution to a Mission-wide evaluation instrument that will conduct a Project-level performance evaluation. The evaluation may include a mid-term and final evaluation, as needed, to gauge performance and impact-related questions.

**1.4 Locations Affected and Existing Conditions:**

The activities under the three sub-purposes will support the GOES’ efforts in crime and violence prevention at national and community levels in selected high risk municipalities. The Project will work with targeted high crime municipalities to establish and strengthen crime prevention committees and where feasible implement the Place Based Approach methodology that introduces secondary and tertiary prevention methods through strong inter-agency coordination. Efforts to improve educational opportunities for in school and out of school youth will also focus in targeted high crime municipalities. USAID will also strengthen institutional capacity at the national and municipal level for service provision in the areas of child protection through working with local organizations, municipal governments, and civil society to improve services that protect the rights of the child.

El Salvador has one of the highest levels of non-political violence in the world and one of the highest homicide rates in the Americas. At the community and individual level, crime and violence causes severe emotional and physical trauma; at the macro level, it impedes sustainable economic growth and undermines citizen support for democratic stability. Crime and violence have also been highlighted as the main drivers for the massive influx of illegal immigration, especially of unaccompanied children (UACs) into the United States.

Crime and violence in El Salvador have multiple drivers, with studies pointing to increases in gender, social and economic inequalities. A range of individual, family, community, and societal factors contribute to the engagement of youth in gangs and illicit activities and the proliferation of violence. These factors include the absence of economic opportunities, especially for youth, and the social disintegration that has resulted from sustained out-migration, notably to the United States.
Recuperation of public spaces has proven to be one of the most effective ways of prevention and citizen coexistence since it allows youth, children, and their families a place to recreate, enjoy cultural activities, practice sports, etc., in an open area, providing a safe environment to community members to congregate peacefully. USAID will support the design, studies, and Environmental Assessment for green spaces and recreational areas in downtown San Salvador.

In many high crime municipalities, youth have little access to quality education or vocational training, and few alternatives to gang membership. According to the UNDP 2011 Human Development Report, of considerable concern are an estimated 250,000 youth between the ages of 14-25 that are neither working nor studying and, as such, are highly vulnerable to gang recruitment. Even those remaining in school are vulnerable to gang recruitment and extortion, as teachers and administrators struggle to ensure a secure learning environment. Furthermore, local governments and communities have historically had little involvement in crime prevention initiatives and/or integration with national policing and crime prevention planning. Although with donor support many municipalities and local communities are now undertaking a more active role, the lack of tradition and meaningful cooperation with the police is a fundamental obstacle to reducing crime and violence.

In the face of this development challenge, El Salvador’s national police force continues to lack modern policing skills and largely relies on reactive policing mechanisms that has led to high arrest rates coupled with distrust at the community level. In response to this and other factors, in 2014 GOES announced a national policy to promote community policing to better align policing with community concerns and local level crime challenges.

This Project will contribute to crime and violence prevention in El Salvador by establishing and supporting of municipal prevention, promoting citizen participation, mobilizing local organizations, leveraging the private sector through public-private partnerships for crime prevention, expanding successful community policing models, and providing education and skills training for at-risk youth.

In many of the communities, municipal facilities such as police stations, community centers and schools are in disrepair and do not foster an productive safe environment for the community members. Therefore, there is a need to improve these facilities through rehabilitation/small scale reconstruction of facilities in disrepair. Local NGOs and community groups exist in municipalities that have good intentions of minimizing crime and violence in their municipality, but they lack to funds and some organizational training to be more effective. The Project will provide small grants/sub-grants to these local organizations/groups as well to Peace Corps through a Special Project Assistance (SPA) grant for PCVs to assist in communities where they are living.

1.5 National Environmental Policies, Procedures or Regulations

El Salvador national environmental laws and policies that apply are within the 1993 “Ley General del Ambiente” and subsequent “Reglamento General de la Ley del Medio Ambiente de El Salvador”.

2. EVALUATION OF ENVIRONMENTAL IMPACT POTENTIAL

The Mission conducts environmental monitoring and evaluation as established by the IEE. For negative determinations with conditions, all implementing partners are required to submit the Environmental Mitigation and Monitoring Plan (EMMP) for review and approval by the Mission Environmental Officer (MEO) and Regional Environmental Advisor (REA)Additionally, Agreement Officer Representatives (AORs) and Contract Officer Representatives (CORs) in conjunction with the MEO and/or Regional Environmental Advisors (REAs) conduct field visits to review application of prescribed mitigation
measures. Based on past monitoring and evaluation of similar ongoing activities, all activities that were monitored in the past have been in compliance with Regulation 216 and all prescribed mitigation measures have been applied and were deemed to be effective. Any existing activities with a Negative Determination with Conditions will update/revise their existing EMMPs and continue to implement the mitigation measures, submit annual reports on the monitoring results, and update the EMMP on an annual basis. Any new activities that receive a Negative Determination with Conditions (i.e. either have a small grant/sub-grant component and/or implementing small scale renovations/rehabilitation/reconstruction (less than 1000sq. meters) shall also be required to implement the EMMP process.

Small scale reconstruction/rehabilitation has the potential to cause a negative impact to the environment by unauthorized disposal of construction materials, debris, and hazardous waste (i.e. asbestos) leading to pollution of water sources, erosion, and/or human safety issues. Extraction of building materials (such as sand, rock, gravel) can also cause erosion if not obtained from an official quarry. Mitigation Measures in the EMMP will assist to minimize these potential impacts.

Small grants/sub-grants components of activities can lead to potential impacts as the specific actions of these grants/sub-grants are not known as the time of the approval of this IEE. Thus, each grant/sub-grant will be required to submit an EMMP for approval by the Implementing Partner and MEO.

Activities implemented under Sub-Purpose 1, Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased, will include technical assistance, consultations, and training aimed at strengthening institutions at the national and local level, working in crime and violence prevention efforts. The Project will also work with municipal governments and representatives of the private sector, youth, faith-based organizations, NGOs, community leaders, grass-root organizations and their leaders to address crime and violence. Activities under Outputs 1.1 Key institutions’ capacity to prevent violence and crime strengthened; 1.2 Innovative approaches to build resilient communities expanded; and 1.3 Civil society engagement to prevent crime and violence increased may include small scale reconstruction and/or rehabilitation for improving facilities that are in disrepair, inadequate or unsafe to be used. Small scale reconstruction may also include improving primary services systems, such as small scale water systems, and making adaptations for accessibility for persons with disabilities. Additionally, under each Output the Project will provide grants/sub-grants to civil society organizations that provide services addressing crime and violence prevention at the community level. Output 1.3 will include and environmental assessment, as well as preliminary electrical, hydraulic, and architectural studies in public recreational spaces.

Activities carried out under Sub-Purpose 2, Community Policing in High Risk Municipalities Expanded, Output 2.1Community policing incentives and legal framework improved will focus on technical assistance, consultations, and training. Activities under Output 2.2 Community service of the police institution improved will provide assistance to the police to expand services (e.g. gender violence, child abuse, etc.) to victims including for vulnerable populations such as people with disabilities, rural, indigenous, children, and LGBTI, through specialized units within police delegations. Activities under Output 2.2 may include small scale renovation/rehabilitation of victims’ centers in police units. It also may include grants/sub-grants to civil society organizations to provide public education to people with specific needs in municipalities where the community policing activities are developed.

Activities carried out under Sub-Purpose 3, Youth Access to Quality Education Opportunities Increased will include technical assistance, consultations, and training to Ministry of Education (MOE) officials. Activities under Outputs 3.1 Key institutions’ capacity to improve education outcomes strengthened; 3.2 Access to education and job opportunities for youth established; and 3.3 Alliances for youth development established, may include small scale reconstruction and/or rehabilitation for improving training facilities that are in disrepair, inadequate or unsafe to be used. Activities under Outputs 3.1 and 3.3 will
also focus on engaging the private sector to leverage additional funding for improving teacher competency and **school infrastructure**, including **construction and reconstruction** of classrooms and other school facilities and areas, as well as small scale reconstruction and/or rehabilitation for improving facilities that are in disrepair, inadequate or unsafe to be used. **Small scale reconstruction** may also include improving primary services systems, such as small scale water systems, installation and/or repair of electrical and electronic connectivity, and making adaptations for accessibility for persons with disabilities. Activities under each Output may include **grants/sub-grants to civil society** organizations to expand participation of youth including youth with special needs, in educational opportunities. The objective of these interventions is to increase access to education in safe learning environments for at risk youth.

### 3. RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

#### 3.1 Recommended Threshold Decisions and Conditions

The USAID Environmental Procedures at 22 CFR 216.2 provide for the classification and determination of potential environmental effects of USAID funded activities and in selected cases for the Categorical Exclusion from these requirements. Section 216.2 (c) (2) provides for Categorical Exclusion for:

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

A **Categorical Exclusion** is recommended for all Sub-Purposes and Outputs actions under this Project that do not include a grant/sub-grant component nor small scale rehabilitation/reconstruction:

- **Sub-Purpose 1: Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased**
  - Output 1.1: *Key institutions’ capacity to prevent violence and crime strengthened.*
  - Output 1.2: *Innovative approaches to build resilient communities expanded.*
  - Output 1.3: *Civil society engagement to prevent crime and violence increased.*

  *For amendment:* (iii) Analyses, studies, academic or research workshops and meetings (EA, design, and studies for Castillo and Parque Cuscatlán. NOTE: special condition includes that the organizations/donors that are doing the actual renovations will use the EA direction and mitigation measures for the final construction actions that they will conduct. USAID will not fund any construction/renovation actions.

- **Sub-Purpose 2: Community Policing in High Risk Municipalities Expanded**
  - Output 2.1: *Community policing incentives and legal frameworks developed.*
  - Output 2.2: *Community service of the police institution improved.*

- **Sub-Purpose 3: Youth Access to Quality Education Opportunities Increased**
  - Output 3.1: *Key institutions capacity to improve education outcomes strengthened;*
  - Output 3.2: *Access to education and job opportunities for youth established.*
  - Output 3.3: *Youth development opportunities through alliances expanded.*

Sub-Purposes and Outputs hereby listed fall within activities above.

A **Negative Determination with Conditions** is proposed for the following Sub-Purposes and Outputs:
- Sub-Purpose 1: Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased
  » Output 1.1: Key institutions’ capacity to prevent violence and crime strengthened.
  » Output 1.2: Innovative approaches to build resilient communities expanded.
  » Output 1.3: Civil society engagement to prevent crime and violence increased.

There is a possibility of remodeling existing facilities, demolishing of walls, rehabilitating of small scale water systems, and other small infrastructure repair or improvement. Environmental guidelines to monitor every proposed remodeling activity must be developed. Also, the three Outputs include grants/sub-grants components and thus each grant/sub-grant requires an Environmental Mitigation and Monitoring Plan (EMMP).

- Sub-Purpose 2: Community Policing in High Risk Municipalities Expanded
  » Output 2.2: Community service of the police institution improved.

There is a possibility of remodeling existing facilities, demolishing of walls, rehabilitating of small scale water systems, and other small infrastructure repair or improvements. Environmental guidelines to monitor every proposed remodeling activity must be developed.

- Sub-Purpose 3: Youth Access to Quality Education Opportunities Increased
  » Output 3.1: Key institutions capacity to improve education outcomes strengthened;
  » Output 3.2.: Access to education and job opportunities for youth established;
  » Output 3.3: Youth development opportunities through alliances expanded.

There is a possibility that activities under the three outputs may include remodeling existing facilities, demolishing of walls, rehabilitating of small scale water systems, and other small infrastructure repair. Under Output 3.3 construction of new school facilities or improvements to school infrastructure already in place may be carried out by private sector partners with whom the Mission establishes alliances. Environmental guidelines to monitor every proposed remodeling activity must be developed. Also, activities under Outputs 3.2 and 3.3 may include grants/sub-grant components and thus each grant/sub-grant requires an Environmental Mitigation and Monitoring Plan (EMMP).

3.2 Mitigation, Monitoring, and Evaluation

To minimize and/or eliminate an environmental impact from activities containing Negative Determinations with Conditions the Contractor/Recipient of new awards and for existing awards shall:

a) Prepare an EMMP describing how they will, in specific terms, implement all environmental mitigation measures described in the plan and monitor their effectiveness. Guidance on preparation of the EMMP will be provided to the Contractor/Recipient as part of the Request for Proposals. Existing awards with existing EMPR/EMMP shall update/revise their document to follow the new EMMP format.

b) Integrate a completed EMMP into the initial work plan.

c) Integrate an EMMP into subsequent Annual Work Plans, making any necessary adjustments to activity implementation in order to minimize adverse impacts to the environment. The EMMP shall be prepared/updated on an annual basis based on the Annual Work Plans.

d) All EMMPs shall be reviewed and approved by the AOR/COR, MEO, and REA before implementation of the actions (small scale construction/rehabilitation) can be implemented.

e) EMMPs shall be monitored by the Implementing Partner using Table 3 of the EMMP on a regular basis as per listed on the EMMP Table 3. COR/AOR/, MEO, and REA shall conduct spot check monitoring of
the EMMP mitigation measures effectiveness and implementation together with the Implementing Partner.

f) EMMP Monitoring Reports shall be prepared and submitted to the AOR/COR and MEO as per the contract terms for reporting. A final annual EMMP Monitoring Report shall be officially submitted to the AOR/COR, MEO, and REA for review and approval. Table 3 of the EMMP shall be used to compile mitigation measure monitoring results. See the EMMP instructions attached to the EMMP for more details on the EMMP process.

g) Each grant/sub-grant shall be required to have an approved EMMP prior to implementation of the grant/sub –grant activities. The main Implementing Partner, AOR/COR, and MEO are responsible to review and approve the grants/sub-grants.

h) Follow the Minister of Environment and Natural Resources guidelines for specific activities such as those established through the Ley de Medio Ambiente (Decreto Legislativo, Diario Oficial No. 339, Tomo No. 3553, 4 de mayo de 1998) and its Regulations (Decreto Legislativo No. 17, 21 de marzo de 2000, Diario Oficial No. 73, Tomo No. 347, 12 de abril de 2000, y sus reformas Decreto Legislativo No. 581, 18 de octubre de 2001 y Diario Oficial No. 206, Tomo No. 353, 31 de octubre de 2001).

i) Follow the Municipal Building guidelines already approved by USAID within the USAID Sectoral Environmental Guidelines (http://www.usaidgems.org/bestPractice.htm) Infrastructure Sector, which replace the Environmental Guidelines for Development Activities in Latin America and Caribbean.

If any large scale (over 1000 sq. meters) construction or actions not covered in this IEE that might cause environmental impacts are to be supported by this activity, an approved amended Initial Environmental Examination is required before these actions can be undertaken.

Recommended Conditions:

- Each activity manager or Contracting (or Agreement) Officer Representative (COR or AOR) is responsible for making sure environmental conditions are met (ADS 204.3.4). In addition, CORs/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 COR/AOR and Chief of Party for implementing mechanisms (TBD) will require the use of the Environmental Mitigation and Monitoring Plan (EMMP) (attached) for those activities (TBD) involving small grants/sub-grants; small scale construction, , small water and sanitation systems; and protection/restoration of water sources . The EMMP will be used for all of the activities listed within this IEE that receive a Negative Determination with Conditions threshold decision.

- To ensure compliance with the USAID environmental regulation 22 CFR 216, the Implementing Partner (IP) is responsible for providing USAID with an Environmental EMMP for activities falling under the Negative Determination with Conditions threshold decision. The Implementing Partner shall ensure that appropriate environmental guidelines are followed and that mitigation measures described in the pertinent Threshold Decision for each of these activities are funded and implemented, including any necessary training or capacity building, and adequate monitoring.

- Applicable best management practices to use within the EMMP process can be found in the USAID Sectoral Environmental Guidelines (http://www.usaidgems.org/bestPractice.htm) which replace the Environmental Guidelines for Development Activities in Latin America and
An amendment of this IEE is required for any activity resulting in policy changes that have the potential to affect negatively the environment, large scale construction and/or water system development, and other activities not yet designed and therefore not described in this document. As well, if agriculture-related activities (TBD) require the use of pesticides, the implementing partner is responsible for applying the existing PERSUAP if available, or prepares a PERSUAP. Any activities involving large scale construction (over 1000 sq. meters), large infrastructure and/or large municipal scaled water system development, or other similar actions would require an IEE amendment to recommend a Positive Determination and the preparation of an Environmental Assessment.

The A/COR and Mission Environmental Officer (MEO) will be required to conduct spot monitoring checks for all of the activities listed in this IEE to ensure that the conditions listed in the IEE, Environmental Threshold Decision (ETD), and EMMP are being followed. The A/COR and MEO should use the EMMP monitoring form (Table 3) to conduct monitoring of activity mitigation measures. REA shall assist in conduct spot checks as well and when additional assistance is requested by the MEO.

The implementing 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 using Table 3 of the EMMP as a monitoring tool for documenting the monitoring results.

### 3.3 Environmental Compliance Language for Contracts and Agreements

Each technical office, along with the REA, will ensure that environmental compliance language from this IEE is included in all procurement and obligating documents, such as activity-related Development Objective Agreements, and under Global Acquisition and Assistance Systems (GLAAS). The following language regarding environmental compliance will be included in any kind of procurement instrument within this Activity:

**Categorical Exclusion and Negative Determination Only.** “The Foreign Assistance Act of 1961, as amended, Section 117 requires that the impact of USAID’s activities on the environment be considered and that USAID include environmental sustainability as a central consideration in designing and carrying out its development programs. This mandate is codified in Federal Regulations (22 CFR 216) and in USAID’s Automated Directives System (ADS) Parts 201.5.10g and 204 (http://www.usaid.gov/who-we-are/agency-policy/series-200), which, in part, require that the potential environmental impacts of USAID-financed activities are identified prior to a final decision to proceed and that appropriate environmental safeguards are adopted for all activities. [Offeror/applicant/contractor/recipient] environmental compliance obligations under these regulations and procedures are specified in the following paragraphs of this [RFP/RFA/contract/task order/grant/cooperative agreement].

In addition, the contractor/recipient must comply with host country environmental regulations unless otherwise directed in writing by USAID. No action funded under this [contract/task order/grant/CA] will be implemented unless an environmental threshold determination, as defined by 22 CFR 216, has been reached for that activity, as documented in a Request for Categorical Exclusion (RCE), Initial Environmental Examination (IEE) duly signed by the Bureau Environmental Officer (BEO).

As part of its initial Work Plan, and all Annual Work Plans thereafter, the contractor/recipient, in collaboration with the USAID COR/AOR and REA or BEO, as appropriate, shall review all ongoing and
planned activities under this [contract/task order/grant/CA] to determine if they are within the scope of the approved Regulation 216 environmental documentation.

**At least one Negative Determination with Conditions, with sub-awards.** An Initial Environmental Examination (IEE) [(insert IEE # or hyperlink, if available)] has been approved for [the Activity] funding this [RFA/RFP/contract/task order/grant/cooperative agreement (CA)]. The IEE covers activities expected to be implemented under this [contract/task order/grant/CA]. USAID has determined that a Negative Determination with Conditions applies to one or more of the proposed actions. This indicates that if these actions are implemented subject to the specified conditions, they are expected to have no significant adverse effect on the environment. The [offeror/applicant/contractor/recipient] shall be responsible for implementing all IEE conditions pertaining to actions to be funded under this [solicitation/award].

As part of its initial Work Plan, and all Annual Work Plans thereafter, the contractor/recipient, in collaboration with the USAID COR/AOR, and REA or BEO, as appropriate, shall review all ongoing and planned actions under this [contract/task order/grant/CA] to determine if they are within the scope of the approved IEE.

If the contractor/recipient plans any new actions outside the scope of the approved IEE, the contractor/recipient shall inform USAID in writing of these changes. No such new actions shall be undertaken prior to receiving written USAID approval.

When the approved IEE contains one or more Negative Determinations with Conditions, the [contractor/recipient] shall:

- Prepare an environmental mitigation and monitoring plan (EMMP) for each proposed action under the Negative Determination with Conditions in the IEE, describing how the contractor/recipient will, in specific terms; implement all IEE conditions that apply within the scope of the award. The EMMP format is attached. The EMMP shall include monitoring the implementation of the conditions and their effectiveness.
- Integrate a completed EMMP into the initial work plan.
- Prepare an Environmental Compliance Report (ECR) at the end of the year or as per reporting requirements of the contract. The ECR shall be based on the monitoring of mitigation measures using Table 3 of the EMMP.
- A revised EMMP must be completed and approved in subsequent Annual Work Plans, making any necessary adjustments to implementation in order to minimize adverse impacts to the environment.

A provision for sub-awards is included under this award. Therefore, the [contractor/recipient] will prepare an EMMP for each proposed sub-award, except those that qualify for a categorical exclusion. In the case of a categorical exclusion, [contractor/recipient] shall complete and submit for USAID approval table 1 of the EMMP (Environmental Review Form- ERF). In order to ensure the funded proposals will result in no adverse environmental impacts. Implementation of sub-awards shall not begin prior to USAID written approval of the corresponding EMMP. The contractor/recipient is responsible for ensuring that mitigation measures specified in the EMMP are implemented.”

Contract Officers will use documents listed in ADS 204.5 “Environmental Compliance: Language for Use in Solicitations and Awards; An Additional Help for ADS Chapter 204” dated May 19, 2008. )
Appendix A: Guidelines for Implementing Partners on the USAID LAC Environmental Mitigation and Monitoring Plan (EMMP)
A. Background

All projects funded by USAID must conform to its Environmental Procedures (22 CFR 216) requiring evaluation to ensure that no adverse environmental impacts result from the projects, that cannot be mitigated. All USAID activities and programs funded through USAID Latin America and the Caribbean (USAID/LAC) Missions are issued an Environmental Threshold Decision (ETD), often designated at the Development Objective level when it is too early to know exactly what, when, and where activities are going to be implemented. The Environmental Mitigation and Monitoring Plan (EMMP) described by these guidelines, ensures compliance with 22 CFR 216 by meeting the conditions specified in the applicable ETDs authorized by the USAID/LAC Bureau Environmental Officer (BEO). The EMMP is intended to be used for activities that have an ETD of Negative Determination with Conditions; that is, those that will not have a significant adverse environmental impact. It is also used for any sub-grant activities as the specific actions of sub-grants are not yet know at the IEE level. Any sub-grant activity can also be given a Negative Determination with Conditions ETD. In addition, Table 3 of the EMMP form can be used as a Mitigation Monitoring Plan for Environmental Assessments (EA).

Programs carried out by implementing partners (IPs) of USAID/LAC Missions include a range of discrete-activities under various awards that will likely have a risk for adverse environmental impact. Examples of illustrative discrete activities include infrastructure refurbishment and medical waste management. This EMMP procedure will provide for both the screening for environmental risk, preparation of a mitigation plan and reporting on monitoring of these mitigation measures, Consideration is given to gender as a social impact factor in the development of a mitigation plan and subsequent measures. Global Climate Change (GCC) is also a consideration within the EMMP process. The EMMP is an effective tool for applying USAID’s Sector Environmental Guidelines to an activity or program.

The EMMP initially categorizes projects into three types: No Risk, Medium Risk and High Risk. Those with No Risk can continue without further review upon completion of the Table 1 screening form. Those with High Risk must be reconsidered for the need of an EA. The EMMP typically deals with those projects at Medium Risk (see Figure 2).

All grantees/contractors that receive a Negative Determination with Conditions ETD will be required to fill out an Environmental Mitigation and Monitoring Plan (as attached) per project type that includes:

---

1 This replaces all previous Environmental Mitigation Plan and Report (EMPR) forms
1. Narrative (Justification/Background, Baseline Information/Existing Conditions, Description of Activities, and Gender Considerations sections must be completed at a minimum).

2. The Environmental Screening Form (Table 1),

3. The Identification of Mitigation Plan (Table 2), and

4. The Environmental Monitoring and Tracking Table (Table 3).

Program managers, Contract/Agreement Officer Representatives (CORs or AORs), and Chiefs of Parties can work with the USAID Mission Environment Officer (MEO) to ensure that impacts are sufficiently identified and mitigation actions are agreed upon, including clear guidance on the procedures for GCC and gender integration, where fitting.

B. Timing of EMMP

During the acquisition process, the applicant or contractor submits a suggested/draft EMMP. This is important as the funding for mitigation implementation will need to be included in Table 3 so that the funds get incorporated in the applicant’s proposal budget. The draft EMMP can also serve as a criteria for selection by the Technical Committee reviewing proposals.

Once the Implementing Partner is chosen, a revised initial EMMP is submitted by the applicant or contractor to the COR/AOR, Mission Environmental Officer, and Regional Environmental Advisor (REA) for approval before commencing activities. This initial EMMP should be revised during the preparation of the 1st year work plan during the 1st month of the operation. For subgrants, the grantee is required to fill out the EMMP and submit it for approval to the Chief of Party (COP). The COP then submits the EMMP for review and final approval to the COR/AOR and MEO. Gender issues, in keeping with the Agency’s executive message on gender integration of May 4, 2009, Global Climate Change (GCC), and other relevant issues have been incorporated in the EMMP. Implementation of activities shall not occur until final approvals of the EMMPs.

A format for this initial EMMP 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.

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) includes the necessary mitigation measures to be monitored, the monitoring indicators, who will conduct the monitoring, and when will the monitoring occur. 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 EMMP 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 serves as the annual report for the EMMP process. This table will be used for project environmental monitoring and will be submitted to the USAID COR/AOR on an annual basis along with the initial EMMP and the narrative write up providing details on the mitigation process. The report should not exceed 10 pages (excluding annexes).

Upon providing the Monitoring Report at the end of the year, a revised EMMP Plan shall be submitted to the COR/AOR for approval that reflects any new activities in the Activity’s second year work plan. This process of submitting the EMMP monitoring report at the end of the year, together with a revised EMMP that reflects the new year’s work plan, is repeated each year until the close of the activity.

C. Initial Environmental Mitigation and Monitoring Plan

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 EMMP as they are already addressed under a “categorical exclusion” determination in the original DO-level IEE and ETD at the Mission. High-risk activities (“ii”) include activities that have irrevocable change and/or cannot be mitigated by the implementation of industry standards, best management practices, categories in Regulation 216 or design specific implementation standards and, therefore, will have significant environmental impacts that will require an EA, typically contracted through the IP with MEO consultation to a professional environmental impact evaluation organization, with final approval by the LAC BEO. 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 EMMP guidance primarily applies.

Figure 2: Schematic of required action based on the level of risk of a component or discrete activity under an award. Note: all sub-grant activities are required to have an EMMP completed. If all questions on Table 1 are checked No, then the sub-grant activity falls under the low risk category and implementation could start directly without further EMMP documentation.
a) 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 (unless actions include agriculture and pesticides)
- 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. Good Agricultural Practices/Best Management Practices would need to be identified for use in training as a mitigation measure listed in Table 2 of the EMMP.

b) Discrete activities that cannot be supported (High-Risk):

Under USAID’s Environmental Procedures, if there is a proposed action that may have significant environmental impacts an approved EA is required prior to its implementation. In the case of pesticide use, a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) will be prepared by the partner and approved by the LAC BEO. Such activities include, but are not limited to:

- Agricultural, livestock introduction or other activities that involve forest conversion
- Resettlement of human populations
- Large-scale water management systems such as dams or impoundments,
- Drainage of wetlands
- Introduction of exotic plants or animals in protected areas
- 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 water bodies including rivers, lakes, and marine waters (not land-based fish ponds)
• Procurement of timber harvesting equipment, including chainsaws
• Use of restricted use pesticides (insecticides, herbicides, fungicides, etc.)
• Large-scale reconstruction in un-degraded lands, such as within protected areas.
• Large-scale new construction (over 1,000 meters$^2$),
• Timber harvesting, or cutting of trees over 20 cm diameter breast height,
• Construction of new roads and/or reroutes.

c) 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 may cause some adverse environmental impact that can be avoided or mitigated with proper planning. For these activities the IP will be responsible for completing the EMMP on an annual basis.

2. Sector-Specific Environmental Screening Form

The Environmental Screening Form (Appendix 1, Table 1) 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 Column “A” of the Environmental Screening Form are checked “YES” 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. If all Column “A” is checked “NO”, then Tables 2 and 3 are not required to be completed and the activity can begin upon approval of the COR/AOR and MEO. When all of the Table 1 questions are checked “NO” ,the MEO must ensure that the activities listed in the Narrative Section “Description of Activities” truly will not cause impacts to the environment. The MEO must also ensure that all of the actions for the activity are listed in the Narrative and that each action is covered in Table 1.


D. Annual Environmental Mitigation Report

On an annual basis each implementing partner will submit an “Environmental Mitigation Report” using the attached EMMP Table 3 (Appendix1). The EMMP 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 EMMP 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 Missions require that IPs 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 and GCC considerations in all stages of planning, programming, implementation, and monitoring of USAID activities.

Sections of the EMMP include:

1. EMMP Coversheet
2. EMMP Narrative (to be filled out with project specific information). NOTE: details for each of the actions to be implemented must be listed in the “Description of Activities” section of the Narrative.
3. Annexes:
   a) Environmental Screening Form (Table 1)
   b) Identification of Mitigation Plan (Table 2)
   c) Environmental Monitoring and Evaluation Tracking Table (Table 3)
   d) Photos, Maps, Level of Effort

Appendix 1:

A. Coversheet for ENVIRONMENTAL MITIGATION and MONITOR PLAN (EMMP)

USAID MISSION DO # and Title: _________________________________

Title of IP Activity: __________________________________________

IP Name: _____________________________________________________

Funding Period:    FY______ - FY______

Associated IEE/ETD: _______________________________

Resource Levels (US$): _______________________________

Report Prepared by: Name:__________________________ Date: ____________

Date of Previous EMMP: ____________________________ (if any)

Status of Fulfilling Mitigation Measures and Monitoring:

Yes  No
___  ___  Initial EMMP describing mitigation plan is attached.

___  ___  Annual EMMP describing status of mitigation measures is established and
     attached.

___  ___  Certain mitigation conditions could not be satisfied and remedial action has been
     provided within the EMMP.

USAID Mission Clearance of EMMP:

  Contract/Agreement Officer’s Representative: __________ Date: ____________

  Mission Environmental Officer: __________________________ Date: ____________

  Regional Environmental Advisor: ________________________ Date: ____________
B. Environmental Mitigation and Monitoring Plan Narrative

1. Background, Rationale and Outputs/Results Expected:

   Summarize and cross-reference proposal if this review is contained therein. For Outputs/Results, please reference the Activities IRs if known.

2. Environmental Baseline (Table 1):

   Describe affected environment/existing condition of the resources needed or that could potentially be impacted. Include essential baseline information available for all affected locations and sites, both primary and ancillary activities. Provide information on the existing infrastructure, roads, agricultural systems, etc. if relevant to the Activity. Succinctly describe location, site details, surroundings (include a map, even a sketch map). Include information on any “unique or extra-ordinary” resources that are within the Activity area such as wetlands, critical habitat, etc.). Include information on the existing climate trends and conditions. How will environmental conditions change due to climate change for the life of the project and expected lifespan of the interventions. 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.

3. Activity Description/Specific Actions to be Implemented:

   Provide both quantitative and qualitative information about actions needed during the activity (e.g. specific actions of construction-size, location, and type of materials to be used), types of agriculture production (full till mechanized, organic etc.), how the intervention will operate, and any connected activities that are required to implement 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.

   Example:

   New construction of a 900 square meter youth center located in XXX town within 40 meters of the River XXX. Construction will be of block and cement with rebar reinforcing. Construction will include a new two stall toilet and sinks using town water source from pipes. A 20 square meter biodigester will be used to capture waste and methane gas piped to the youth center kitchen for use as cook fuel. Biodigester will be underground and built of concrete by molds. Electrical wiring for the youth center will be installed with the power source by solar panels on the zinc roof and batteries/electrical circuits located attached to the center in a closed and locked storage room.

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, during, and after 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, 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, climate change adaptation, climate change...
mitigation, 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, timber harvesting, etc.

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

For the initial EMMP: 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 EMMP: Describe status of complying with the conditions. Examples of the types of questions an IP should answer to describe "status" follow.

a) What mitigation measures have been put in place? How is the success of mitigation measures being determined (i.e., indicators)? If they are not working or not effective, why not? What adjustments need to be made?

b) 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

Gender equality is a USG-wide priority, and USAID has and will continue to take a lead role in that effort. Integrating gender considerations into all stages of planning, programming, and implementation of development assistance is not only a legal mandate, but is 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. Therefore, gender and persons with disabilities considerations are included in the EMMP checklist to ensure project implementation adheres to agency priorities and mandate. By following design criteria (mitigation measures in EMMP Table 2) including consideration of social issues help avoid significant project impacts (see 216.3 (a)(3)(iii)). In this regard, gender issues must be addressed in procurement documents and evaluation criteria. 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?

The agency has a legal mandate that gender is considered in all development activities and in addition gender and persons with disabilities are socioeconomic issues that impact the success of our project activities.

7. Climate Change Integration
Climate change impacts all areas of development and is often considered both a threat and a driver to many activities that USAID supports. Good climate integration is part of good project design. In addition, Executive Order 13677: “Climate-Resilient International Development” encourages integration of the Agency's GCC Initiative (GCC) of mitigation and adaptation principles throughout its portfolios. Therefore, GCC impacts (to the activity and from the activity implementation) shall also be considered. Actions that would minimize GCC impacts shall be included in the list of mitigation activities to be implemented.
<table>
<thead>
<tr>
<th>Name of Activity:</th>
<th>Type of Activity:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contractor/Grantee:</td>
<td>Date:</td>
</tr>
</tbody>
</table>

**INFRASTRUCTURE**

<table>
<thead>
<tr>
<th>Column A</th>
<th>Column B</th>
<th>Col C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>If answered yes to Col. A. is it a—?</td>
</tr>
<tr>
<td>High Risk</td>
<td>Medium-Risk</td>
<td></td>
</tr>
</tbody>
</table>

1. Will the project involve construction¹ and/or reconstruction/rehabilitation of any type of infrastructure? For new construction, if less than 1000 m² = medium risk, if greater than 1000 m² = high risk
2. Will the project involve work on roads? If new construction/rerouting = high risk², if repair/rehabilitation (improving drainage, resurfacing of existing roads or trails) = medium risk
3. Will the project construction cost more than US $500,000? If YES, then a cost benefit analysis and approval of a USAID Engineer are required as mitigation measures in Table 2.
4. Is an operations and maintenance plan required? (for all type of infrastructure, road rehabilitation, or water and sanitation action = Yes)
5. Will the activity increase existing noise levels?
6. Does the activity require local planning permission(s) (i.e., infrastructure improvements)?
7. Does the activity require adherence to national building code or other national regulatory standard?

**BIOPHYSICAL**

<table>
<thead>
<tr>
<th>Column A</th>
<th>Column B</th>
<th>Col C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>If answered yes to Col. A. is it a—?</td>
</tr>
<tr>
<td>High Risk</td>
<td>Medium-Risk</td>
<td></td>
</tr>
</tbody>
</table>

8. Will the project involve the use, plans to use, or training in the use of pesticides³ (including bio pesticides like neem)?
9. Will the project involve changes or impacts in the uses of water (such as irrigation, storage, potable water, water harvesting)
10. Will the project impact surface water (rivers, lakes, wetlands and ponds) or ground water?
11. Will the activity involve training and/or implementation of agricultural practices/production including animal husbandry?
12. Will the project involve aquaculture systems?
13. Will the project involve the use or disposal of hazardous materials (used engine oil, paint, varnish, lead-based products, or other hazardous or special management waste)?
14. Will the project involve implementation of timber management⁴, extraction of forest products, clearing of forest cover, and/or conversion of forest land?
15. Are there any potentially sensitive terrestrial or aquatic areas near the project site, including protected areas, wetlands, critical wildlife habitat (including nesting areas), and threatened or endangered species?
16. Will the activities proposed generate airborne particulates (dust), greenhouse gas emissions, liquids, or solids (i.e. discharge pollutants) or potentially violate local air standards?
17. Will the activity create objectionable odors?
18. Will the activity occur on steep slopes (greater than 15%)?
19. Will the activity contribute to erosion?
20. Will the activity change existing land use in the vicinity?
21. Is the proposed activity incompatible with land type (i.e., annual crops on steep slopes, infrastructure on poorly drained soils)?
<table>
<thead>
<tr>
<th>Question</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Will the activity affect unique geological or physical features?</td>
<td></td>
</tr>
<tr>
<td>Will the activity have potential impacts to inhabitants, natural</td>
<td></td>
</tr>
<tr>
<td>landscapes, or flora/fauna downstream from the activity site?</td>
<td></td>
</tr>
<tr>
<td>Will the activity have a direct or indirect impact, or include actions</td>
<td></td>
</tr>
<tr>
<td>with mangroves, coral reefs and other marine/coastal ecosystems?</td>
<td></td>
</tr>
<tr>
<td><strong>GLOBAL CLIMATE CHANGE</strong></td>
<td></td>
</tr>
<tr>
<td>Are project activities or outcomes vulnerable to changes in the weather</td>
<td></td>
</tr>
<tr>
<td>or climate such as changes in precipitation patterns, increased</td>
<td></td>
</tr>
<tr>
<td>temperatures or sea level rise?</td>
<td></td>
</tr>
<tr>
<td>Does the project’s activities exacerbate climate change vulnerabilities</td>
<td></td>
</tr>
<tr>
<td>(i.e., drought, flooding, decrease water supply)?</td>
<td></td>
</tr>
<tr>
<td><strong>SOCIO ECONOMIC</strong></td>
<td></td>
</tr>
<tr>
<td>Will the activity contribute to displacement of people, housing or</td>
<td></td>
</tr>
<tr>
<td>businesses?</td>
<td></td>
</tr>
<tr>
<td>Will the activity affect unique cultural, indigenous peoples and/or</td>
<td></td>
</tr>
<tr>
<td>historic features?</td>
<td></td>
</tr>
<tr>
<td>Will the activity expose people or property to flooding?</td>
<td></td>
</tr>
<tr>
<td><strong>ENVIRONMENT &amp; HEALTH</strong></td>
<td></td>
</tr>
<tr>
<td>Will the project activities create conditions encouraging an increase</td>
<td></td>
</tr>
<tr>
<td>of waterborne diseases or populations of disease carrying vectors?</td>
<td></td>
</tr>
<tr>
<td>Will the activity generate hazards or barriers for pedestrians, motorists</td>
<td></td>
</tr>
<tr>
<td>or persons with disabilities?</td>
<td></td>
</tr>
<tr>
<td>Will the project involve the use, storage, handling or disposal of</td>
<td></td>
</tr>
<tr>
<td>syringes, gauzes, gloves and other biohazard medical waste?</td>
<td></td>
</tr>
<tr>
<td>Will the activity expose workers to occupational hazards?</td>
<td></td>
</tr>
<tr>
<td><strong>GENDER</strong></td>
<td></td>
</tr>
<tr>
<td>Does the project activity inhibit the equal involvement of men and</td>
<td></td>
</tr>
<tr>
<td>women?</td>
<td></td>
</tr>
<tr>
<td>Do the project results disproportionately benefit/impact men and</td>
<td></td>
</tr>
<tr>
<td>women?</td>
<td></td>
</tr>
<tr>
<td><strong>OTHER</strong></td>
<td></td>
</tr>
<tr>
<td>Does the project/Activity involve a sub-grant component?</td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

- (c) The project has potentially substantial or significant adverse environmental effects, therefore, an EA is required before activity implementation (Positive Determination). NOTE: if any question is marked as High Risk, an EA is required and Tables 2 and 3 of the EMMP do not need to be completed.

- (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 adverse environmental effects that cannot be mitigated. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

---

1 Construction projects need to be reviewed for scale, planned use, building code needs and maintenance. New construction having a footprint larger than 1000 meters² or 10,000 feet² is considered large scale and high risk. Some small construction projects, such as building an entrance sign to a park, may require simple mitigation measures whereas larger buildings will require more extensive review and monitoring.

2 New construction of roads and trails are considered high risk and will require a full environmental assessment of the planned construction, i.e. a Positive Determination. Any reroutes of a road or trail longer
than 100 meters is considered a high risk. Reroutes within a protected area, nearby a water source/wetlands, and/or archaeological site are considered a high risk.

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

4 Any activities that involve harvesting trees or converting forests is considered high risk and will require a full environmental assessment of the activity (i.e. Positive Determination).

5 A positive response to gender questions require follow up only when there are other positive responses on questions 1 – 30, and an EMMP is developed.

6 If the Project/Activity includes a sub-grant component, each sub-grantee shall be required to prepare an EMMP prior to implementation of the sub-grant.
**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># of the question from Table 1</th>
<th>Action or component with the different tasks required to implement the action.</th>
<th>Description of Impact</th>
<th>Environmental Mitigation Measures*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Component - Construction and maintenance of latrine</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 1- design</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 2- location</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 3- purchase of materials</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 4- build latrine</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 5- site clean-up/disposal of construction waste</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 6- use of latrine/operations and maintenance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Component – Purchase and construction of a water storage system</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 2</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Step 3</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>etc.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Indicate which mitigation measures will be used from the USAID Sector Environmental Guidelines or other pertinent guidelines, see [http://www.usaidgems.org/sectorGuidelines.htm](http://www.usaidgems.org/sectorGuidelines.htm). Details on exact monitoring plan are illustrated in Table 3, Environmental Monitoring and Evaluation Tracking Table.
<table>
<thead>
<tr>
<th>#</th>
<th>Description of Mitigation Measure (same as in Table 2)</th>
<th>Responsible Party for implementing and monitoring mitigation measures</th>
<th>Monitoring Methods</th>
<th>Indicators of implementation and effectiveness of indicators</th>
<th>Monitoring Methods</th>
<th>Frequency</th>
<th>Estimated Cost of implementing mitigation measures and monitoring</th>
<th>Results</th>
<th>Recommended Adjustments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>