PROGRAM/ACTIVITY DATA

Country Code: 306
Program Area: Higher Education
Country or Region: Afghanistan
Activity Name: American University of Afghanistan (AUAF)
Intermediate Result: 2.2: Equitable Access to Quality, Relevant Education Increased and 2.3: Women’s Equality and Empowerment Increased
Sub-IR:
2.2.2: Education Systems Strengthened to Prepare Afghans for Employment and 2.3.1: Women’s Contribution to Afghanistan’s Economy, Government, and Civil Society Increased
Funding Period: Aug 1, 2013-November 30, 2019
Amount: $64.5 million
IEE Prepared by: Andrea Molfetto
Date: March 9, 2017
Amended IEE (YES/NO): Y
Amended IEE (YES/NO) Reason: Original IEE: STEP-UP (Tracking #: OAPA-13-MAR-AFG-0029). Some activities were covered by an IEE for a previous AUAF project (Tracking # OAPA-11-APR-AFG-0021). Request for Categorical Exclusion (RCE) Amendment 1 (Tracking #: OAPA-14-FEB-AFG-0023)

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)
Categorical Exclusion [X] Deferral [ ]
Positive Determination [ ] Negative Determination [ ]
Negative Determination With Conditions [X] Exemption [ ]

1. PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION
1.1 Purpose

The original IEE under the STEP-UP Project Appraisal Document (PAD) was approved on March 25, 2013 and IEE Amendment 1 for a stand-alone Request for Categorical Exclusion (RCE) for AUAF was approved on February 4, 2014. AUAF also had a previous IEE which was approved on April 28, 2011, Tracking #OAPA-11-APR-AFG-0021. The purpose of Amendment 2, in accordance with 22 CFR 216, is to duty and in a timely manner account for:

1. An extension of the end date of the IEE in line with the end of the Funding Period from July 31, 2018 to November 30, 2019
2. Document an increase in Life of Project (LOP) funding amount from $40 million to $64.5 million
3. Expansion of activities under the AUAF activity
4. Addition of construction activities and add a negative Determination with Conditions associated with the construction
1.2 Background:

AUAF will receive assistance to provide high quality courses and programs that are market-driven and within the high demand professions of the public and private sectors. To promote sustainability the follow-on award focuses on AUAF’s accreditation in the U.S., which assures the quality standards are equal to other American universities. To improve AUAF’s financial independence it will increase income generation by offering more courses through the Professional Development Institute (PDI); collecting increased tuition fees; and increasing fund-raising activities.

In 2015, USAID had detected serious institutional weaknesses at AUAF that are negatively affecting academic quality. By 2016, USAID engaged three independent teams to perform an Organizational Capacity Assessment, with support from the Asia Foundation; an ISO 9001:2000 pre-certification audit, by Horwath-Mak; and a comprehensive mandatory mid-term evaluation by Cecchi.

The conclusions of the mid-term evaluation, supported by the two other independent assessments are that:

1. AUAF has some serious problems with leadership, focused largely on the Board of Trustees.
2. There is a widespread perception that AUAF is experiencing a decline in the overall quality of the academic programs of the University.
3. AUAF is not financially sustainable in the foreseeable future.

As USAID was evaluating the conclusions and recommendations from these assessments, two serious security incidents occurred and the university’s response to these events has further called into question AUAF’s capacity to operate safely in this non-permissive, high-threat environment.

In spite of its problems, AUAF is worth supporting because of the positive impact it has on its students and the subsequent impact the students are having and are likely to continue to have on Afghanistan.

In response to USAID’s Corrective Action Letter, sent to AUAF on September 7, 2016, AUAF submitted a revised Program Description and re-aligned budget. Both documents call for an expansion of current activities as well as the addition of construction activities.

Due to the incorporation of construction activities, this document, which was formally an RCE, is now an IEE.

1.3 Activity Description:

During the remainder of the Agreement, with support from USAID, AUAF will implement the following activities under five Components:

Component 1: Providing Effective Security

Component 1 of the revised AUAF Program Description accounts for security enhancements. After reviewing security surveys conducted by the USAID PLSO and Embassy RSO, the US Military, Afghan security services, and several security firms, AUAF has devised major
security upgrades and requested USAID funding for these upgrades to protect the safety and security of students, faculty and staff. AUAF will provide a security environment suitable to the current threat level of the university in order to enable AUAF to resume full operation for the spring semester on March 25, 2017. AUAF will work closely with all stakeholders towards this end. Activities anticipated under this component should qualify for either a Categorical Exclusion or a Negative Determination with Conditions. The illustrative activities are:

- Undertake essential security infrastructure enhancements and upgrades
- Enable concentrated security posture by moving the undergraduate program to the International Campus
- Comprehensive security assessments and will implement recommended additional security enhancements, as feasible
- AUAF will continue to undertake essential security infrastructure enhancements based on a comprehensive security assessment by a third party firm approved and monitored by USAID
- Public Address & Security System—The PA system will be installed throughout all buildings and at external posts on both campuses. The security alarm system consists of a push-button “panic alarm” to act as an early warning to notify personnel of an emergency situation and subsequent immediate “actions on.”
- T-Walls- six meter high needed to replace the three meter high t-walls previously surrounding both the West and International Campuses
- Concrete Foundation for T walls at the International Campus
- Container-Housing for all Expat Personnel
- Install Barbed Wire at top of T-Walls and Tie T-walls with 20 mm steel cable at all three ring locations
- Build Air Lock enclosure at Bravo Gate (Int'l Campus)
- Upgrading doors with doors with steel blast gates for Strategic Offices
- Add CCTV at both Campuses
- Build-out Defensive Roof Positions
- Install Drop Bar Barriers at Several Locations
- GPS and personal accountability system for use in an emergency situation
- Biometric System for Intl. Campus
- Increase/Enhance campuses security Lighting
- Concrete Access Control Center
- Pre-Fabricated Guard Towers
- New Pedestrian Gate for West and International Campuses
- Wooden Material for Form Work of Concrete Work on Different Projects
- Materials for Blocking Gaps Between T-Walls and Perimeter Walls
- Materials for Culvert for Service Road and Darulaman Road- Materials to connect the service road and to the main Darulaman Road at the West Campus
- Installation of 2m and 3.6m T-Walls and Steel Gates
- Fabrication and Installation of Steel Bollard along Darulaman
• Steel Material for Steel Gates
• Steel Material for Making Steel Doors
• Construction of Grocery Store at International Campus
• Secure permission for and hire a Private Security Company (PSC)
• Use Private Security Company to develop and implement a constantly evolving comprehensive safety and security plan

Component 2: Serving the Higher Education Needs of Afghanistan

Component 2 of the revised AUAF Program Description accounts for meeting the higher education needs of Afghanistan. AUAF aims to provide needed academic degrees and high-quality professional certification programs to as wide a population as possible. A diverse student body, development of online resources and classes (as permitted by the Afghan government) and careful expansion of academic programs are a few of the ways in which AUAF is working to serve the higher education needs of Afghanistan. Activities anticipated under this component should qualify for a Categorical Exclusion. Illustrative activities are:

• Hold recruitment activities and efforts in many provinces
• Offer and support extracurricular and co-curricular activities to increase student civic and community engagement
• Participate in distance education conferences organized by the MoHE Prepare report on online classes experience from fall 2016 semester
• Increase use of distance learning techniques and online resources, consistent with Afghan government regulations
• Carry out research on needs of Afghanistan
• Expand MBA program to respond to specific Ministries’ needs, based on careful consideration of the Ministry needs, provision of full funding by non-USAID funders, and appropriate capacities of AUAF
• Plan possible restructuring of departments into schools for implementation when appropriate
• Expand tailored programs by PDI for specific Afghan ministries and organizations, based on careful consideration of the specific ministry or organization’s needs, availability of non-USAID funding, and capacities of AUAF
• Increase the use of distance learning techniques and online resources in cooperation with US or regionally based universities

Component 3: Enhancing Quality Academic Programs

Component 3 of the revised AUAF Program Description accounts for Academic Quality. AUAF is currently working on the third stage of accreditation and fully expects to complete the MoHE accreditation process. Through the Center for Excellence and Quality Assurance (CEQA, started in 2011) and the Center for Teaching and Learning (CTL, started in 2017), AUAF will also work to ensure that the curriculum achieves a quality equivalent to that of well-respected programs in the US and internationally. In order to increase the academic quality and to meet accreditation standards and curriculum quality, the university will
continue to seek talented faculty to strengthen academic programs. Activities anticipated under this component should qualify for a Categorical Exclusion. Illustrative activities are:

- Complete required activities and resources for accreditation application at AACSB
- Complete required activities and resources for entering Stage 1 accreditation by a US regional institutional accreditation body
- Report from informal visit of delegation of experienced US-based academics
- Conduct teaching assessments
- Provide regular pedagogy trainings
- Reports on lessons learned by the CTL
- Maintain or increase percentage of approximately 40% of undergraduate and graduate teaching faculty who hold doctoral degrees
- Develop strategy for recruiting more highly qualified faculty, especially Afghan faculty
- Maintain student-faculty ratio of no more than 22 students per faculty member
- Install and use smart classroom technologies

Component 4: Supporting Women’s Academic and Professional Development

Component 4 of the revised AUAF Program Description encourages female enrollment and enhances educational opportunities for women. AUAF will nourish and encourage this environment through continuous efforts to recruit and retain female students in the academic programs as well as in the professional certification programs; recruit and retain well-qualified female staff and faculty; and encourage overall female participation in a vibrant academic environment. Activities anticipated under this component should qualify for a Categorical Exclusion. Illustrative activities are:

- Increase recruitment of female students for undergraduate and graduate programs
- Increase graduation of female students from undergraduate and graduate programs
- Female students participate in a robust mentoring program
- Female students participate in a robust career services program
- Increase recruitment of female students in PDI certification programs
- Increase female students’ completion of PDI certification programs
- Increase proportion of female faculty
- Increase proportion of female staff

Component 5: Increasing Financial Self-Sufficiency

Component 5 of the revised AUAF Program Description accounts for AUAF’s financial stability. During the remainder of the Agreement, AUAF will develop a strategic plan for an appropriate level of graduate and undergraduate enrollment. Fundraising housed at AUAF will play a more important role in the university’s financial planning. Activities anticipated under this component should qualify for a Categorical Exclusion. Illustrative activities are:
• Prepare a strategic plan for appropriate level of graduate and undergraduate enrollment coupled with developing increased scholarship resources
• Implement the strategic plan for enrollment levels and increase outside funding for financial assistance
• Increase local and regional funding sources from in-house fundraising
• Increase regional and international sources from FAUF with support from in-house fundraising
• Analyze operational costs to identify opportunities for containment
• Increase skills in staff through proper professional development
• Perform a review of cost-containment strategies as well as research best practices of comparable universities.
## 2.0 RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

<table>
<thead>
<tr>
<th>Component</th>
<th>Activities</th>
<th>Effects on natural or physical environment</th>
<th>Recommended Threshold Determination and Conditions</th>
</tr>
</thead>
</table>
| **Component 1: Providing Effective Security** | • Undertake essential security infrastructure enhancements and upgrades  
• Enable concentrated security posture by moving the undergraduate program to the International Campus  
• Comprehensive security assessments and will implement recommended additional security enhancements, as feasible  
• AUAF will continue to undertake essential security infrastructure enhancements based on a comprehensive security assessment by a third party firm approved and monitored by USAID  
• Public Address & Security System—The PA system will be installed throughout all buildings and at external posts on both campuses. The security alarm system consists of a push-button “panic alarm” to act as an early warning to notify personnel of an emergency situation and subsequent immediate “actions on.”  
• T-Walls- six meter high needed to replace the three meter high t-walls previously surrounding both the West and International Campuses  
• Concrete Foundation for T walls at the International Campus  
• Container-Housing for all Expat Personnel  
• Install Barbed Wire at top of T-Walls and Tie T-walls with 20 mm steel cable at all three ring locations  
• Build Air Lock enclosure at Bravo Gate (Int'l Campus)  
• Upgrading doors with doors with steel blast gates for Strategic Offices  
• Add CCTV at both Campuses  
• Build-out Defensive Roof Positions  
• Install Drop Bar Barriers at Several Locations  
• G-P-S and personal accountability system for use in an emergency situation  
• Biometric System for Intl. Campus  
• Increase/Enhance campuses security Lighting  
• Concrete Access Control Center  
• Pre-Fabricated Guard Towers  
• New Pedestrian Gate for West and International Campuses  
• Wooden Material for Form Work of Concrete Work on | Limited impact if Conditions are adhered to | **Negative Determination with Conditions:**  
Conditions: AUAF will make sure that all planning, design and construction shall comply with ALL applicable Afghanistan Environmental Standards for construction, etc. norms, standards, licensing and permitting, and in their absence with the best international practices which should be acceptable to USAID. AUAF shall provide documented evidence (maps, schemes, photos, etc.) of the site prior, during and after construction/ rehabilitations, as well as of applicable permits and licenses issued by duly Afghan authorities. Regional Security Office of US Embassy shall review and concur the design and standards.  
The Contractor shall provide an Environmental Mitigation and Monitoring Plan, either a stand-alone plan, or as part of an Environmental, Health and Safety Plan (EHSP) as is the norm in construction activities. The EMMP shall list all activities, potential impact and mitigation measures, see Annex 1 for a template. |
<table>
<thead>
<tr>
<th>Different Projects</th>
<th>None</th>
</tr>
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<tbody>
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<td>• Materials for Blocking Gaps Between T-Walls and Perimeter Walls</td>
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<td>• Construction of Grocery Store at International Campus</td>
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<td>per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs</td>
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**Component 2: Serving the Higher Education Needs of Afghanistan**

- Hold recruitment activities and efforts in many provinces
- Offer and support extracurricular and co-curricular activities to increase student civic and community engagement
- Participate in distance education conferences organized by the MoHE. Prepare report on online classes experience from fall 2016 semester
- Increase use of distance learning techniques and online resources, consistent with Afghan government regulations
- Carry out research on needs of Afghanistan
- Expand MBA program to respond to specific Ministries' needs, based on careful consideration of the Ministry needs, provision of full funding by non-USAID funders, and appropriate capacities of AUAF
- Plan possible restructuring of departments into schools for implementation when appropriate
- Expand tailored programs by PDI for specific Afghan ministries and organizations, based on careful consideration of the specific ministry or organization’s needs, availability of non-USAID funding, and capacities of AUAF
- Increase the use of distance learning techniques and online resources in cooperation with US or regionally based universities

**Component 3: Enhancing Quality**

- Complete required activities and resources for accreditation application at AACSB
- Complete required activities and resources for entering

None

**Categorical Exclusion**

per 22 CFR 216.2 (c)(2)(i) Education, technical assistance, or training programs
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|  | training programs |
|  | Categorical Exclusion per 22 CFR 216.2 |
|  | (c)(2)(i) Education, technical assistance, or training programs |
3.0 ENVIRONMENTAL RECOMMENDATIONS

Recommended Action: Categorical Exclusions (estimated 70% of funding)

AUAF activities for Higher Education Needs of Afghanistan, Enhance Quality of Academic Programs, Supporting Women’s Academic and Professional Development and Financial Self-Sufficiency that do not have an effect on the natural and physical environment fit within the categories listed in 22 CFR 216.2 (c)(2) and are categorically excluded from any further environmental review requirements. The originator of the proposed action has determined that the proposed activities are within the following classes of actions:

- Education, technical assistance, or training programs, except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.). [22 CFR 216.2(c)(2)(i)];
- Analyses, studies, academic or research workshops and meetings. [22 CFR 216.2(c)(2)(iii)];
- Document and information transfers. [22 CFR 216.2(c)(2)(v)]; and
- 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.). [22 CFR 216.2(c)(2)(xiv)].

Recommended Action: Negative Determination with Conditions (estimated 30% of funding)

AUAF will undertake essential security infrastructure enhancements and upgrades to ensure student, faculty, and staff safety while on campus. AUAF will renovate and repair damage sustained from the August 2016 attack to include two buildings, the female mosque and other miscellaneous repairs. Other activities are as follows:

- Enable concentrated security posture by moving the undergraduate program to the International Campus
- Comprehensive security assessments and will implement recommended additional security enhancements, as feasible
- AUAF will continue to undertake essential security infrastructure enhancements based on a comprehensive security assessment by a third party firm approved and monitored by USAID
- Public Address & Security System— the PA system will be installed throughout all buildings and at external posts on both campuses. The security alarm system consists of a push-button “panic alarm” to act as an early warning to notify personnel of an emergency situation and subsequent immediate “actions on.”
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• Steel Material for Steel Gates
• Steel Material for Making Steel Doors
• Construction of Grocery Store at International Campus

Conditions:
AUAF will make sure that all planning, design and construction shall comply with ALL applicable Afghanistan Environmental Standards for construction, etc. norms, standards, licensing and permitting, and in their absence with the best international practices which should be acceptable to USAID.

AUAF shall provide documented evidence (maps, schemes, photos, etc.) of the site prior, during and after construction/ rehabilitations, as well as of applicable permits and licenses issued by duly Afghan authorities.

Regional Security Officer of US Embassy shall review and concur the design and standards.

The Contractor shall provide an Environmental Mitigation and Monitoring Plan, either a stand-alone plan, or as part of an Environmental, Health and Safety Plan (EHSP) as is the norm in construction activities. The EMMP shall list all activities, potential impact and mitigation measures see Annex 1 for a template.

AUAF will not purchase any additional property that would lead to the extension of the perimeter of the current property. The damage sustained during the August attack required only refurbishment of existing structures. There was no structural damage suffered therefore according to ADS 204.3.4(1) an environmental audit was not necessary.

AUAF does have operations and maintenance systems in place with capable personnel. Proper records are kept regarding all operating equipment irrespective if the equipment is maintained by AUAF personnel or sent out for maintenance or repair.
Currently, AUAF is in the procurement process of providing proper FEMA quality safe rooms throughout both campuses. In the interim, AUAF has enhanced its security posture by providing “safe areas” for staff and students. Safe areas are rooms or corridors that do not have the same structural security as a FEMA-standard safe room but these areas do have steel doors designed to restrict the entry of attackers. These doors are constructed of two steel sheets (8mm and 6mm) with plywood between. Food, water, and first-aid kits are within each of these safe areas. AUAF is also in the process of ensuring these "safe areas" have latrine facilities. AUAF has redeployed additional security personnel with the responsibility to man each of these safe areas in event of a crisis. Additionally, AUAF has established liaison with Afghan and international forces who have surveyed the campuses and are prepared to provide evacuation assistance in the event of a crisis.

4.0 LIMITATIONS OF THE IEE

This assistance does not cover activities involving:

1. Procurement or use of genetically modified organisms (GMOs) which will require preparation of a bio-safety assessment (review), in accordance with ADS 201.3.9.3b in an amendment to the IEE approved by BEO/OAPA.
2. Procurement or use of Asbestos, Lead and Mercury Containing Materials (ALCM) (e.g., piping, roofing), Polychlorinated Biphenyl’s (PCB) or other hazardous materials prohibited by US EPA as provided at: http://www.epa.gov/asbestos and/or under international environmental agreements and conventions, e.g. Stockholm Convention on Persistent Organic Pollutants as provided at: http://chm.pops.int.
3. Procurement, use or recommendation for use of AN and CAN fertilizers.
4. Procurement, use, or recommendation for use of pesticides both in agriculture and construction.

Any of these actions would require an amendment to the IEE duly approved by the BEO/OAPA.

5.0 LIMITATIONS OF THE IEE

This IEE does not cover the following:

- Assistance, procurement or use of genetically modified organisms (GMOs) will require preparation of biosafety assessment (review) in accordance with ADS 201.3.12.2(b) in an amendment to the IEE approved by OAPA BEO.
- DCA or GDA programs.
- Procurement or use of Asbestos Containing Materials (ACM) (i.e. piping, roofing, etc.), Polychlorinated Biphenyl (PCB) containing transformers, or other hazardous/toxic materials for construction projects, including lead and mercury.
- Procurement, use, or recommendation for use of pesticides both in agriculture and construction. The contractor shall prepare a Pesticide Evaluation Report and Safer
Use Action Plan (PERSUAP) or see which existing valid PERSUAPs can be amended for the purpose of the project.

- Procurement or use of Ammonium Nitrate (AN) and Calcium Ammonium Nitrate (CAN) fertilizers.

Any of these actions would require an amendment to the IEE and the BEO/OAPA approval by the BEO/OAPA.

6.0 REVISIONS

Pursuant to 22CFR216.3(a)(9), if new information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” or if additional activities are proposed that might be considered “major” and their effects significant, this IEE will be reviewed and revised by the originator of the project and submitted to the Bureau Environmental Officer (BEO) for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID Agreement Officer’s Representative (AOR) to keep the Mission Environmental Officer and the BEO informed of any new information or changes in the activity that might require revision of the IEE.
### APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

American University of Afghanistan (AUAF), IEE Amendment 2

<table>
<thead>
<tr>
<th>Role</th>
<th>Clearances</th>
<th>Date</th>
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<tbody>
<tr>
<td>A/COR</td>
<td>Andrea Molfetto</td>
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<tr>
<td>Acting Director Office of Education</td>
<td>Andrea Molfetto</td>
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<tr>
<td>Mission Environmental Officer</td>
<td>Cleared by email</td>
<td>3/13/2017</td>
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<td></td>
<td>Harry Bottenberg</td>
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<tr>
<td>Regional Environmental Advisor/SCA &amp; OAPA</td>
<td>Cleared by email</td>
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<td>Andrei Barannik</td>
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<td>Resident Legal Officer</td>
<td>John G. Butler</td>
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<td>Deputy Mission Director</td>
<td>Kathryn Stevens</td>
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<td><strong>Approval:</strong></td>
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<td>Mission Director</td>
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<td><strong>Concurrence:</strong></td>
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<tr>
<td>Bureau Environmental Officer/OAPA</td>
<td>Gordon Weynand</td>
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</table>

**DISTRIBUTION:** MEO, COR/AOR, OAA, RLO
Annex 1.

Project Name

Environmental Mitigation and Monitoring Plan (EMMP)

The EMMP must be completed by each organization carrying out activities under the USAID/Afghanistan’s Higher Education Program. It will include the organization’s own report plus the EMMPs of any sub-awardees, to capture the entire range of activities funded by the USAID/Afghanistan Higher Education Program under the award. The USAID/Afghanistan Higher Education Program, implementing partners are responsible for ensuring that each sub-awardee completes and submits the EMMP to the prime in a timely fashion. The EMMPs are reviewed and approved by the CCTR/AOTR and the Mission Environmental Officer.

The EMMP consists of 3 parts:

1. The Environmental Verification Form
2. The Mitigation Plan for specific environmental threats carried out by the implementer
3. The Reporting Form

The EMMP Environmental Verification Form

This form indicates the categories of activities carried out by implementing partners (or their sub-awardees) and serves to ‘trigger’ USAID expectations of mitigation measures.

The EMMP Mitigation Plan

Implementing partners will use the Mitigation Plan to describe the specific actions they will undertake under each category of activity when screening reveals potential environmental threats as outlined in Section 3 of this IEE. In these cases, mitigation will be undertaken as described in Section 5, Table 4 of this IEE. The Mitigation Plan also identifies the person responsible for monitoring compliance with mitigation and the indicator, method and frequency of monitoring.

The EMMP Reporting Form

This form reports on the results of applying the mitigation measures described in the Mitigation Plan and identifies outstanding issues with respect to required conditions. In some cases, digital photos will be the best way to document mitigation and should be included in the report.

**EMMP Part 1 of 3: Environmental Verification Form**
Name
______________________________________________________

Name of Prime Implementing Organization: __________________________

Name of Sub-awardee Organization (if this EMMP is for a sub):
______________________________________________________

Geographic location of USAID-funded activities (Province, District):
______________________________________________________

Date of Screening:____________________________________

Funding Period for this award: FY__ - FY__

Current FY Resource Levels: FY________

This report prepared by:
Name:______________________ Date:_____

Date of Previous EMMP for this organization:
______________ (if any)

Indicate which activities your organization is implementing under this funding:

<table>
<thead>
<tr>
<th>Key Elements of Program/Activities Implemented</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>1. education, technical assistance or training programs; analyses, studies, academic or research workshops and meetings; document and information transfers; 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.);</td>
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<tr>
<td>2. Development and dissemination of improved agricultural production technologies for selected crops and livestock</td>
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<td>3. Increased agricultural production</td>
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<td>4. Seeds, Germplasm, Exotic Species</td>
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<td>5. Dissemination of biotechnology products</td>
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<td>6. Small-scale construction or rehabilitation of buildings and water &amp; sanitation infrastructure</td>
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<td>7. Sub-Grants</td>
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**EMMP Part 2 of 3: Environmental Mitigation and Monitoring Plan**

<table>
<thead>
<tr>
<th>Category of Activity</th>
<th>Describe specific environmental threats of your organization's activities (based on analysis in Section 3 of the EE)</th>
<th>Description of Mitigation Measures for these activities as required in Section 5 of IEE</th>
<th>Who is responsible for monitoring</th>
<th>Monitoring Indicator</th>
<th>Monitoring Method</th>
<th>Frequency of Monitoring</th>
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**EMMP part 3 of 3: Reporting form**

<table>
<thead>
<tr>
<th>List each Mitigation Measure from column 3 in the EMMP Mitigation Plan (EMMP Part 2 of 3)</th>
<th>Status of Mitigative Measures</th>
<th>List any outstanding issues relating to required conditions</th>
<th>Remarks</th>
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</table>

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Certification

I certify the completeness and the accuracy of the mitigation and monitoring plan described above for which I am responsible and its compliance with the IEE:

________________________  __________________________
Signature                  Date

________________________
Print Name

________________________
Organization

BELOW THIS LINE FOR USAID USE ONLY

USAID/Afghanistan, ________ Program, Clearance of EMMP:

Cognizant Technical Officer: __________________________ Date: ______________

Mission Environmental Officer: _________________________ Date: ______________

As appropriate: REA, BEO [depending on nature of activity, which potentially may require an EA]

Note: if clearance is denied, comments must be provided to applicant
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS

American University of Afghanistan (AUAF), IEE Amendment 2

A/COR
Clearances: [Signature] 03/14/2017
Hila Oleksijuk

Acting Director Office of Education
Andrea Molfetto 3/14/2017

Mission Environmental Officer
Cleared by email
Harry Bottenberg 3/13/2017

Regional Environmental Advisor/
SCA & OAPA
Cleared by email
Andrei Bahnnik 3/11/2017

Resident Legal Officer
John G. Bulter 3/14/17

Deputy Mission Director
Kathryn Stevens

Approval:
Herbert Smith 3/13/17

Concurrence
Gordon Weynant 3/13/17

DEN: OAPA-17-MAR-AFG-0017

DISTRIBUTION: MEO, COR/AOR, OAA, RLO
Re: URGENT: AUAF IEE Amendment #2
1 message

Andrei Barannik <abarannik@usaid.gov>  
To: Harry Bottenberg <hbottenberg@usaid.gov>  
CC: Mohammad Mustafa Sultani <msultan@usaid.gov>, Andrea Molfetto <amolfetto@usaid.gov>

Harry - reviewed - few comments:

- are AFG construction standards are acceptable to USG?! are these adequate? there should be a condition, as per USAID Construction Policy, that USG engineer(s) & I'd advise, RSO, review and concur the to the design and standards
- will there be an extension of a perimeter of the wall, including for extra structures, which may lead to land acquisition? if yes, is this land public or private? if private how owners will be compensated?
- with all noted varios deteriorations on the campus, was there an environmental audit to review water quality, waste management, latrines, etc?! is there a designated staff who's responsible and capable to O & M relevant systems? is there any record keeping? these services are important for the educational process as well as in cases, god forbid, a new attack when large No os students may be on the lock-down for long periods of time
- has the university reported to USAID on the past implementation and compliance with EMMP?

When these above are addressed & incorporated into the IEE Amnd, please consider it cleared by REA.

When the said IEE Amnd is approved in the Mission, pls send it to Gordon Weynand, BEO/OAPA (cced Erin Laws) for his review and concurrence.

W/r from ISB,
Andrei

On Fri, Mar 10, 2017 at 1:49 PM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:
Andrei, for your review.

On Fri, Mar 10, 2017 at 10:43 AM, Andrea Molfetto <amolfetto@usaid.gov> wrote:
Hi Harry,

To inquire further on your comments (which I left in on this version)- most of them are goals and Yes, security is a new component. Does this mean we have to amend the STEP-UP PAD? (please say no, please say no) :-)
Re: URGENT: AUAF IEE Amendment #2
1 message

Harry Bottenberg <hbottenberg@usaid.gov> Mon, Mar 13, 2017 at 6:48 PM
To: Andrea Molletto <amolletto@usaid.gov>
Cc: Kathryn Stevens <kstevens@usaid.gov>, Mohammad Mustafa Sultani <msultani@usaid.gov>, Andrei Barannik <abarannik@usaid.gov>, Beatrice Conde <bconde@usaid.gov>, Liudmyla Oleksiiuk <loleksiiuk@usaid.gov>

Oh I forgot. I clear the attached IEE Am. 2 for AUAF.

harry

On Mon, Mar 13, 2017 at 10:17 AM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:
pls use the attached, what you send had some formatting issues and a page with a blank table and other blank spaces, I took those out. I will leave the statement about required to adherence to Afghan construction standards in the document because they do exist despite what OL said, these standards are under the National Solidarity Program (NSP).

On Mon, Mar 13, 2017 at 10:03 AM, Andrea Molletto <amolletto@usaid.gov> wrote:
Hi Harry,

See attached.

Andrea

On Mon, Mar 13, 2017 at 6:29 PM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:
I have not cleared yet, I wanted to see the final edits. If someone can send me latest version, thanks.

On Sat, Mar 11, 2017 at 7:26 AM, Harry Bottenberg <hbottenberg@usaid.gov> wrote:
Andrea, pls add appropriate language re Andrei's first bullet and run it by OL, Mustafa can help. OL is normally in the loop on any construction and review designs. In this case there will only be a number (how many?) of CHUs so not much in terms of designs but there will be sanitation and possibly potable water (for which water testing needs to be added to the requirements).

Andrei's 2nd bullet should be easy to address, the others ones are a bit tricky - I don't think any previous assessment or audits have been done because there have been no construction activities. Except for the 200 bed dorm which is being done by OL. Please talk to those folks for coordination purposes, Mustafa can help.

I will clear once these issues have been addressed, will check my email tomorrow.

Sent from my iPhone

On Mar 11, 2017, at 12:55 AM, Andrei Barannik <abarannik@usaid.gov> wrote:

Harry - reviewed - few comments:

- are AFG construction standards are acceptable to USG?! are these adequate? there should be a condition, as per USAID Construction Policy, that USG engineer(s) & I'd advise, RSO, review and concur the to the design and standards
- will there be an extension of a perimeter of the wall, including for extra structures, which may lead to land acquisition? if