ENVIRONMENTAL THRESHOLD DECISION

Activity Location: El Salvador

Activity Title: Crime and Violence in Targeted Municipalities Reduced

Activity Number: 519-0468

Life-of-Activity Funding: $155 million


IEE prepared by: Dorita de Gutiérrez, Regional Program Office
Robert McKenney, Democracy and Governance Office
Margarita de Lobo, Democracy and Governance Office

Reference ETDs: LAC-IEE-16-56 and LAC-IEE-15-30

Date: May 23, 2017

Recommended Threshold Decision: Categorical Exclusion;
Negative Determination with Conditions

Bureau Threshold Decision: Concur

1. BACKGROUND, PURPOSE AND SCOPE

1.1 Purpose and Scope:

The purpose of this IEE is to amend LAC-IEE-16-56 and LAC-IEE-15-30 to:

- Update section 1.1 Purpose and Scope to extend the Life of the Crime and Violence in Targeted Municipalities Reduced Project No. 519-04678 through September 30, 2022 to reflect the new Project Appraisal Document (PAD) completion date;
- Modify section 1.3 Description of Sub-Purposes and Illustrative Activities to add illustrative interventions 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”;

- \[ \text{...} \]

- \[ \text{...} \]
• Update section 3.3 Environmental Compliance Language for Contracts and Agreements;
• Update Annex A, Guidelines for Implementing Partners on the USAID LAC Environmental Mitigation Plan (EMMP) to include the most recent version dated November 19, 2015; and
• Include the documentation of the Climate Risk Management (CRM) Assessment for the Crime and Violence in Targeted Municipalities Reduced Project No. 519-0468 that has received a Low Risk rating. The CRM chart is attached as Attachment 1 to this IEE amendment.

All other terms and conditions remain in full force and effect.

1.2 Background

The Democracy and Governance team has identified three new activities that support Sub-Purpose 1 “Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased” and Sub-Purpose 3 “Youth Access to Quality Education Opportunities Increased”:

(1) The IMAGINA Project: A new five-year crime prevention activity expected to be implemented by Fundación Salvadoreña para el Desarrollo Económico y Social de El Salvador (FUSADES) and Fundación Crisálida (Glasswing) to provide a local citizens’ observatory of quality of life that generates reliable and comparable information about different quality of life dimensions, including citizen participation. The new activity will also support the renovation of Parque Cuscatlán, a major park located in San Salvador, by establishing a trust fund with a local bank to manage private sector contributions for renovation and ongoing maintenance.

(2) The Alliance for Families and Schools Free of Violence Activity: A new four-year education and youth development activity expected to be implemented by Fundación Empresarial para el Desarrollo Educativo (FEPADE) that will provide psychosocial services at the school level in high risk communities, to youth, parents, and teachers to help them overcome difficult experiences they are exposed on a day-to-day basis. Additionally, participating schools will serve as platforms to continue after school sports activities, which are not provided by the school system and which promote the students’ well-being.

(3) The Physical Education Program (PEP): A new three-year youth development activity expected to be implemented by Fundación Educando a un Salvadoreño (FESA) that will provide training to Physical Education teachers and provide safe spaces for youth to practice sports combined with a values component.

1.3 Description of Sub-Purposes and Illustrative Activities

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

Illustrative Interventions

• Support civil society organizations and private sector crime and violence prevention investments and interventions through alliances.

2. POTENTIAL ENVIRONMENTAL IMPACTS
All Potential Environmental Impacts listed in the original IEE remain the same.

3. ENVIRONMENTAL THRESHOLD DETERMINATION (ETD)

A categorical exclusion is granted to the new activity: “Support civil society organizations and private sector crime and violence prevention investments and interventions through alliances” under Output 1.3 Civil Society Engagement to Prevent Crime and Violence Increased:

(i) Education, technical assistance, and training;
(ii) Analysis, studies, and meetings.

A negative determination with conditions is granted to the new activity: “Support civil society organizations and private sector crime and violence prevention investments and interventions through alliances” under Output 1.3 Civil Society Engagement to Prevent Crime and Violence Increased, because the IMAGINA Project will support a trust fund to manage private sector contributions for the renovation and ongoing maintenance of Parque Cuscatlán.

All of the ETD for activities listed in the LAC-IEE-16-56 remain the same.

Conditions and Requirements

This IEE amendment updates some Conditions, Mitigation, Monitoring and Evaluation direction. These updates, found in section 3.2 of the IEE, are highlighted in yellow.

3.1 Conditions

All conditions remain the same.

3.2 Mitigation, Monitoring, and Evaluation

All monitoring requirements remain the same.

3.3 Environmental Compliance Language for Contracts

Specific language is found in IEE Amendment Section 3.3.

3.4 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.

4. CLIMATE RISK MANAGEMENT (CRM)

A CRM Assessment was done for the activities under the Crime and Violence in Targeted Municipalities Reduced Project listed in the attached IEE. The CRM process determined that the Activities fall under a low risk due to the type of activities (training, technical assistance, studies, plans) that will be implemented in the Activities. See IEE Section 4 and the CRM screening table is attached to the IEE as Attachment 1.

Signed __________ Date 6/7/2017
Geeta Uhl
Acting Bureau Environment Officer
Bureau for Latin America and the Caribbean

Copy to: Larry Sacks, Acting Mission Director
Adam Schmidt, DMD
Mary Rodríguez, MEO
Dorita de Gutiérrez, SDO
Robert McKenney
Margarita de Lobo, DG
Joe Torres, REA

Attachments:
• Initial Environmental Examination LAC-IEE-16-56
• Initial Environmental Examination LAC-IEE-15-30

File Locations:
LAC Bureau- P:\LAC.RSD.PUB\ENV\Reg 216\IEE\IEE17
Environmental compliance database-this document will be posted to the environmental compliance database at http://gemini.info.usaid.gov/egat/envcomp/index
Clearance Page for:
IEE Amendment No. 2 for the Crime and Violence in Targeted Municipalities Reduced Project No. 519-0468 to extend the life of project through September 2022, include three new potential GDAs, and other actions.

Drafted by:
RPO: Dorita de Gutiérrez Date: 03/09/2017

Clearances:
DG: Robert McKenney Date: 01/10/2017
DG: Adam Schmidt Date: 03/13/2017
MEO/EG: Mary Latino-Rodriguez Date: 04/05/2017
REA/EG: Joe Torres Date: 04/05/2017
RPO: Greg Swarin Date: 04/01/17
DMD: Kimberly Delaney Date: 05/30/17

Recommended for Approval:
Lawrence J. Sacks, MD Date: 05/30/17
INITIAL ENVIRONMENTAL EXAMINATION (IEE)
Amendment No. 2
Threshold Decision No. LAC-IEE-16-56 and 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. 519-001

Project Title and Number: IR 1.2 Crime and Violence in Targeted Municipalities Reduced, No. 519-0468

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

Life of Project: FY 2013 – FY 2022

Reference Threshold Decision: LAC-IEE-16-56 and LAC-IEE-15-30

IEE Prepared by: Dorita de Gutiérrez, Regional Program Office Robert McKenney, Democracy and Governance Office Margarita Lobo, Democracy and Governance Office

Date Prepared: May 23, 2017

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-16-56 and LAC-IEE-15-30 to:

a. Update section 1.1 Purpose and Scope to extend the Life of the Crime and Violence in Targeted Municipalities Reduced Project No. 519-04678 through September 30, 2022 to reflect the new Project Appraisal Document (PAD) completion date;

b. Modify section 1.3 Description of Sub-Purposes and Illustrative Activities to add illustrative interventions 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”;

c. Update section 3.3 Environmental Compliance Language for Contracts and Agreements;

d. Update Annex A, Guidelines for Implementing Partners on the USAID LAC Environmental Mitigation Plan (EMMP) to include most recent version dated November 19, 2015; and

e. Include the documentation of the Climate Risk Management (CRM) Assessment for the Crime and Violence in Targeted Municipalities Reduced Project No. 519-0468 that has received a Low Risk rating. The CRM chart is attached as Attachment 1 to this IEE amendment.

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, 2022.

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,

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.

The Democracy and Governance team has identified three new activities that support Sub-Purpose 1 “Broad Based Engagement in Crime Prevention Efforts at the Local Level Increased” and Sub-Purpose 3 “Youth Access to Quality Education Opportunities Increased”:

1. The IMAGINA Project: A new five-year crime prevention activity expected to be implemented by Fundación Salvadoreña para el Desarrollo Económico y Social de El Salvador (FUSADES) and Fundación Crisálida (Glasswing) to provide a local citizens’ observatory of quality of life that generates reliable and comparable information about different quality of life dimensions, including citizen participation. The new activity will also support the renovation of Parque Cuscatlán, a major park located in San Salvador, by establishing a trust fund with a local bank to manage private sector contributions for renovation and ongoing maintenance.

2. The Alliance for Families and Schools Free of Violence Activity: A new four-year education and youth development activity expected to be implemented by Fundación Empresarial para el Desarrollo Educativo (FEPADE) that will provide psychosocial services at the school level in high risk communities, to youth, parents, and teachers to help them overcome difficult experiences they are exposed on a day-to-day basis. Additionally, participating schools will serve as platforms to continue after school sports activities, which are not provided by the school system and which promote the students’ well-being.

3. The Physical Education Program (PEP): A new three-year youth development activity expected to be implemented by Fundación Educando a un Salvadoreño (FESA) that will provide training to Physical Education teachers and provide safe spaces for youth to practice sports combined with a values component.
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
- Support civil society organizations and private sector crime and violence prevention investments and interventions through alliances.

**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-bullying, 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 a 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 the 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 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 know at 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 will include small scale reconstruction and 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 2.1 Community 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 granted to the new activity added under Output 1.3 Civil Society Engagement to Prevent Crime and Violence Increased: “Support civil society organizations and private sector crime and violence prevention investments and interventions through alliances” as the activities include:

- (i) Education, technical assistance, and training;
- (iii) Analyses, studies, academic or research workshops and meetings.
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 granted to the new activity: “Support civil society organizations and private sector crime and violence prevention investments and interventions through alliances” under Output 1.3 Civil Society Engagement to Prevent Crime and Violence Increased, because the IMAGINA Project will support a trust fund to manage private sector contributions for the renovation and ongoing maintenance of Parque Cuscatlán.

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 Conditions, Mitigation, Monitoring, and Evaluation

To minimize and/or eliminate an environmental impact from activities containing Negative Determinations with Conditions the Contractor/Recipient 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 along with the Annual Work Plan.

d) All EMMPs shall be reviewed and approved by the AOR/COR, MEO, and REA before 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) Each grant/sub-grant shall be required to have an approved EMMP prior to implementation of the grant/sub–grant activities. The prime Implementing Partner, AOR/COR, and MEO are responsible to review and approve the grants/sub-grants.

g) 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.

h) Each grant, sub-grant, rehabilitation, or small-scale construction activity shall 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) Each grant, sub-grant, rehabilitation, or small-scale construction activity shall follow the Municipal Building guidelines already approved by USAID within the USAID Sectoral Environmental Guidelines ([http://www.usaidgems.org/bestPractice.htm](http://www.usaidgems.org/bestPractice.htm)) Infrastructure Sector, which replace the Environmental Guidelines for Development Activities in Latin America and Caribbean.

Language reflecting this condition must be included in all agreements and contracts implementing this component.

**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 Plan & Report (EMMP) (attached) for those activities (TBD) involving small grants; agricultural interventions that may involve small scale infrastructure, the use of irrigation, and the use of pesticides; small scale construction, watershed protection, small water and sanitation systems; and protection/restoration of water sources and blue/green infrastructure. 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 for small business development, infrastructure, and sanitation facilities, and any other type of NDWC actions for this IEE that require the EMMP process can be found in the USAID Sectoral Environmental Guidelines ([http://www.usaidgems.org/bestPractice.htm](http://www.usaidgems.org/bestPractice.htm)).

- 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 irrigation, 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, irrigation, 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.

- 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](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 (CA)].

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.

3.4 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.

4. CLIMATE RISK MANAGEMENT (CRM)

In accordance with Executive Order 13677 on Climate-Resilient International Development, as of September, 2016, all USAID projects and activities require being managed for climate risks. The Climate Risk Management (CRM) process at the project level was undertaken and from this the CRM Point Contact determined that the climate risk is low for those illustrative actions within the DO1 Crime and Violence in Targeted Municipalities Reduced PAD as described in Section 1.3 of the IEE amendment.
The low climate risk indicates climate change is unlikely to materially impact achievement or sustainability of project or activity outcomes. To that end, a “Climate Risk Screening and Management Tool for Activity Design” Table documenting the CRM for the Activities is included as Attachment 1.

Appendix A: Guidelines for Implementing Partners on the USAID LAC Environmental Mitigation and Monitoring Plan (EMMP)
Guidelines for Implementing Partners

USAID/Latin American and Caribbean Bureau (LAC) ENVIRONMENTAL MITIGATION and MONITORING PLAN (EMMP) ¹

November 19, 2015

A. Background

All activities funded by USAID must conform to its environmental procedures outlined in 22 CFR 216, which require Initial Environmental Evaluations (IEE) to ensure that “environmental factors and values are integrated into the USAID decision-making process” and that “the environmental consequences of USAID-financed activities are identified and considered by USAID and the host country prior to a final decision to proceed and that appropriated environmental safeguards are adopted”.

All USAID activities and programs funded through USAID’s Latin America and the Caribbean (LAC) Missions are issued an Environmental Threshold Decision (ETD) by the Bureau Environmental Officer (BEO) pursuant to the IEE as per 22 CFR 216.3(a)2. One category of Threshold Decision is the Negative Determination (22 CFR 216.3(a)3), which is given to projects that are not “found to have a significant effect on the environment” when certain conditions are in place. In LAC, the development of an Environmental Mitigation and Monitoring Plan (EMMP) is often one of the conditions set forth in the Negative Determination. The EMMP ensures compliance with 22 CFR 216 by identifying and mitigating environmental effects of USAID activities and by meeting any other conditions specified in the applicable ETD. It is also used for any sub-award activities where the specific actions of sub-award are not yet identified at the time of award. In addition, Table 3 of the EMMP form can be used as a Mitigation and Monitoring Plan for Environmental Assessments (EA).

Activities 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 significant environment effects. Examples include activities such as infrastructure refurbishment or medical waste management. This EMMP procedure will provide for both the screening for environmental risk, the preparation of a mitigation plan and reporting on monitoring of these mitigation measures. Gender and persons with disabilities are also considered as social impact factors in the development of a mitigation plan as these have a direct bearing on the type and kind of mitigation measure to be prescribed. Global Climate Change (GCC) and its impact on the project, as well as the project’s to exacerbate GCC is also a consideration within the EMMP process. Finally, the EMMP is an effective tool for applying USAID’s Sector Environmental Guidelines to an activity or program which has been developed as per 22 CFR 216.3(a)3(iii). (http://www.usaidgems.org/sectorguidelines.htm).

¹ This replaces all previous Environmental Mitigation Plan and Report (EMPR) forms
The EMMP initially categorizes activities into three risk categories: No Risk, Medium Risk, and High Risk. Those with No Risk can continue without further review upon completion of the Table 1 screening form and review and approval of the risk analysis by the Agreement/Contract Officer’s Representative (AOR/COR) and the Mission Environment Officer (MEO). The EMMP typically deals with those activities at Medium Risk (see Figure 2). Those with High Risk must be reconsidered for the need of an EA. Risk is further defined in section C1 below.

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

1. Narrative (Justification/Background, Baseline Information/Existing Conditions, Description of Activities, and Social Considerations sections must be completed at a minimum).
2. The Environmental Screening Form (Table 1),
3. The Environmental Mitigation Plan (Table 2), and
4. The Environmental Monitoring Table (Table 3).

AOR/CORs, Activity Managers, and Implementing Partners can work with the USAID MEO to ensure that environmental effects are sufficiently identified and mitigation actions are agreed upon, including clear guidance on the procedures for GCC and social considerations, where fitting.

B. Timing of EMMP

All solicitations for activities that fall within the NWDC will included this document as part of the solicitation package as per the ADS 204 annex regarding solicitation language. As per direction outlined here and in the Environmental Considerations section of all solicitation, potential applicants must present a draft EMMP with their submission. This is important as the funding for mitigation implementation identified in Table 3 must be incorporated in the applicant’s proposal budget. The draft EMMP can also serve as a criteria for selection by the Technical Evaluation Committee reviewing proposals.

Once the IP is chosen, a revised initial EMMP is submitted by the applicant or contractor to the AOR/COR at the time the initial work plan is submitted. The MEO, and the Regional Environmental Advisor (REA) must approve this EMMP before work can commence. For sub-awards, the awardee 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 AOR/COR and MEO. Implementation of activities shall not occur until final approvals of the EMMPs are received.

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 activity is at the Medium Risk Level.
2. The identification of potential impacts and related mitigation measures using the “Environmental Mitigation Plan” (Appendix 1, Table 2) for each sub-activity.
3. The Environmental Monitoring 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, along with a report reflecting the status of implementation and effectiveness monitoring of the identified mitigation measures using the “Environmental Monitoring Table” (Appendix 1, Table 3). This serves as the Annual Environmental Compliance Report (ECR) required by most implementing mechanisms.

Results from the ECR are subsequently incorporated into a revised EMMP that shall be submitted to the AOR/COR for approval by the MEO/REA that reflects any new activities in the activity’s second year work plan along with any changes to mitigation measures based on the prior year’s monitoring. This process of submitting the EMMP monitoring report at the end of the year, together with a revised EMMP that reflects the following year’s work plan, is repeated each year until the close of the activity (See Figure 1).

C. Initial Environmental Mitigation and Monitoring Plan

1. Classification of Level of Risk
Different activities under an award can have varying levels of risk for environmental effects and therefore require different courses of action (Figure 2). No-risk activities, classified under “a” below, do not require the development of an Environmental Mitigation Plan (Table 2) or an Environmental Monitoring Table (Table 3) and could be covered under a Categorical Exclusion (22 CFR 216.2(c)). The AOR/COR should consult with the MEO to determine if the action in question has already received an Categorical Exclusion or if one must be requested from the BEO. Activities identified as Medium-risk (“b”) require the IP to screen those potential environmental effects and develop a plan to mitigate them. High-risk activities (“c”) include activities that have irrevocable change and/or cannot be mitigated by the implementation of industry standards, best management practices, or design specific implementation standards and, therefore, are considered to have significant environmental effects that will require an EA (22 CFR216.2(d)).

Figure 2 below depicts a schematic of required action based on the level of risk of a particular activity under an award. Note: all sub-award activities are required to have an EMMP completed. If all questions on Table 1 are checked No, then the sub-award activity falls under the low risk category and implementation could start directly without further analysis, pending approval of the work plan by the AOR/COR and MEO.

![Figure 2: Schematic of required action based on the level of risk of a particular activity under an award](image)

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 activities 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 subjects learned during training could adversely affect the environment (e.g., training on agricultural techniques), the training is expected to include as part of its curriculum, an analysis of environmental effects and a plan for mitigation. Mitigation measures such as Good Agricultural Practices/Best Management Practices would need to be identified for use in training as a mitigation measure and listed in Table 2 of the EMMP.

Many discrete activities under an agreement will fall between the two extremes of low and high risk and may cause some significant environmental effects 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.

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

Under USAID’s Environmental Procedures, if there is a proposed action that may have significant environmental effects, an approved EA is required prior to its implementation (22 CFR 216.2(d)1). 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 (22 CFR 216.3 (b)). Such activities include, but are not limited to:

• Agricultural, livestock introduction or other activities that involve forest conversion
  • Resettlement of human populations
  • Construction of 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, for example)
  • 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 meters²)
  • Timber harvesting, or cutting of trees over 20 cm diameter breast height related to forest management or for commercial products.
  • Construction of penetration roads and/or reroutes
d) Cumulative effects

Even though individual activities may be considered medium risk, when those activities are analyzed in terms of other USAID actions and/or other non-USAID actions that are likely to occur, cumulative effects must be considered and may require the development of an EA.

e) Extraordinary circumstances

Certain extraordinary circumstances must be considered and may require an EA. These include:
- impacts to sensitive terrestrial or aquatic areas (see question 14)
- impacts to unique cultural or historical features (see question 28)

2. Environmental Screening Form

The Environmental Screening Form (Appendix 1, Table 1) contains information relevant to the potential environmental effects over the life of activity with regard to natural resources, the environment, and human 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 “Environmental Mitigation Plan” (Appendix 1, Table 2). The Environmental Mitigation Plan simply outlines the plan of action for mitigation of potential environmental effects. 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 from the COR/AOR and MEO. When all of Table 1 questions are checked “NO”, the MEO must ensure that the activities listed in the “Description of Activities” narrative section 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 Compliance Report

As per terms and conditions of all awards with USAID, each implementing partner is expected to submit an Annual Report, which normally requires an ECR. If an EMMP has been developed, it should be used to fulfill this requirement. The ECR should contain information relevant to the potential environmental effects over the life of a discrete activity under an award and includes: a) a copy of the initial EMMP completed during the initial activity planning (reference Section B above); b) the prescribed mitigation measures using the “Environmental Mitigation Plan (Appendix 1, Table 2)”; and c) synthesized data on these mitigation measures collected throughout the year and tracked in the “Environmental Monitoring 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.
E. Sections of the EMMP

1. EMMP Coversheet
2. EMMP Narrative (to be filled out with activity 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. Appendices:
   1. Environmental Screening Form (Table 1)
   2. Environmental Mitigation Plan (Table 2)
   3. Environmental Monitoring Table (Table 3)
   4. Photos, Maps, Level of Effort

Guidelines for Implementing Partners
USAID/LAC ENVIRONMENTAL MITIGATION and MONITORING PLAN (EMMP)

Appendix 1:

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

USAID MISSION DO # and Title: ________________________________

Title of IP Activity: _________________________________________

IP Name: ___________________________________________________

Award Number: _____________________________________________

Funding Period: FY_____ - FY_____

Associated IEE/ETD: _________________________________________

Life of Activity Funding (US$): ______________________________

Report Prepared by: Name:__________________________ Date: ____________

Date of Previous EMMP: ____________________________ (if any)

Status of Fulfilling Mitigation Measures and Monitoring:

Yes  No
___  ___  Initial EMMP.
___  ___  Annual EMMP.

USAID Mission Clearance of EMMP for XXX Activity:

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:

   Provide a brief summary of the activities under consideration and expected results.

2. Environmental Baseline:

   Describe the existing condition of the area of the activity. This should include a description of/baseline information on the natural and physical resources that could potentially be affected by the activity. 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 such as how might environmental conditions change due to climate change for the life of the activity and expected lifespan of the interventions? Describe how the activity will involve men and women whose actions during the life of the activity may have a direct effect 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 to be undertaken during the activity (e.g. specific actions of construction-size, location, and type of materials to be used, etc.), 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 and is 70 meters from 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.

Activities with sub-awards require a specific EMMP for each award.

4. Evaluation of the Potential for Environmental Effects (Tables 1 and 2):

As a component of conducting environmental screening and developing the Environmental Mitigation Plan (Appendix 1, Table 2), briefly summarize environmental effects 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, summarize the mitigation measures in the “Environmental Mitigation Plan” (Table 2) and briefly describe how these measures will be monitored in the “Environmental Monitoring Table” (Table 3). Ensure that Table 3 includes the cost of implementing and monitoring each of the mitigation measures listed.

For the Annual EMMP, describe the effectiveness of mitigation measures based on monitoring. For example:

a) What mitigation measures have been put in place? How is the success of mitigation measures being determined (i.e., indicators)? Explain if and why the mitigation measures are not working or not effective? 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?

6. Social Considerations

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; it 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 Development Objective and the Intermediate Results level of Development 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.

Additionally, the USAID Disability Policy Paper (http://pdf.usaid.gov/pdf_docs/PDABQ631.pdf) sets out specific requirements to help ensure that appropriate consideration is given to persons with disabilities as a factor in development planning at the Development Objective and the Intermediate Results level of Development Objectives all the way down to the activity level. Therefore, gender and persons with disabilities considerations are included in the EMMP checklist to ensure activity implementation adheres to agency priorities and mandate. Additional information can be found at the following website: http://www.usaid.gov/sites/default/files/Guide_How_Integrate_Disability_Gender_Assessments_2010.pdf.

Ultimately, consideration of social issues helps avoid significant environmental effects (see 216.3 (a)(3)(iii)). Environmental mitigation measures should be specifically designed to take in account social issues such as gender and persons with disability, thus ensuring greater success of the mitigation measure and greater long-term sustainability of the activity. The impacts and roles of women and children should be also taken into consideration when completing Table 2 regarding environmental (social) impacts and designing mitigation measures.
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 change integration is part of good activity 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.
Appendix 1. Environmental Screening Form (Table 1)

<table>
<thead>
<tr>
<th>Name of Activity:</th>
<th>Implementing Partner:</th>
<th>Award Number:</th>
<th>Date:</th>
<th>Relevant IEE/ETD #</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Column</th>
<th>Column</th>
<th>Column C</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>B</td>
<td>C</td>
</tr>
</tbody>
</table>

**INFRASTRUCTURE (Buildings, roads, WASH, etc.)**

1. Will the activity involve construction and/or reconstruction/rehabilitation of any type of building? For new construction, if less than 1,000 m² = medium risk, if greater than 1,000 m² = high risk.

2. Will the activity involve building penetrating roads, road rehabilitation and maintenance or other road related infrastructure (drainage, bridges, etc.)? If penetrating road construction/rerouting = high risk, if repair/rehabilitation (improving drainage, resurfacing of existing roads) = medium risk.

3. Will the activity involve construction or rehabilitation of water and sanitation infrastructure (irrigation systems, potable water, water harvesting, septic systems etc.). Potable water systems require testing for bacteria, arsenic and other heavy metals.

4. Will the activity involve construction or rehabilitation of any other infrastructure such as landfills, incinerators, energy infrastructure, etc.

5. Will the infrastructure activity cost more than US $500,000? If YES, approval of a USAID Engineer is required as mitigation measures in Table 2. Additionally, compliance with FAA 611 is required (please consult with the mission legal advisor).

6. Does the activity require adherence to national building code or other national regulatory standard? Mitigation measures in Table 2.

7. Does the activity require local planning permissions (i.e zoning, building permits, etc.)

**BIOPHYSICAL**

8. Will the activity involve the purchase, use, plans to use, or training in the use of pesticides (including bio pesticides like neem)?

9. Will the activity involve changes in water quality (pollution, sedimentation, stagnation, salinization, temperature change, etc.)

10. Will the activity affect surface or groundwater quantity

11. Will the activity involve training and/or implementation of agricultural practices/production including animal husbandry?

12. Will the activity involve aquaculture systems?

13. Will the activity involve the use or disposal of hazardous materials (used engine oil, paint, varnish, lead-based products, fluorescent light bulbs/mercury, batteries, asbestos or other hazardous or special management waste)? Consider effects to both the biophysical environment and human health.

14. Will the activity involve implementation of timber management, extraction of forest products, clearing of forest cover, and/or conversion of forest land by cutting of trees >20cm diameter at base height (DBH)?

15. Is the activity in or near (within 50m²) any sensitive terrestrial or aquatic areas including protected areas, wetlands, critical wildlife habitat (including nesting areas), and threatened or endangered species?
<table>
<thead>
<tr>
<th></th>
<th>Question</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>Will the activities proposed generate airborne particulates (dust), liquids, or solids (i.e. discharge pollutants) or potentially violate local air standards?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Will the activity create objectionable odors?</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>18</td>
<td>Will the activity occur on steep slopes (greater than 15%)?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Will the activity contribute to erosion?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Will the activity change existing land use in the vicinity?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>Is the proposed activity incompatible with land type (i.e., annual crops on steep slopes, infrastructure on poorly drained soils)?</td>
<td></td>
<td></td>
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<tr>
<td>22</td>
<td>Will the activity affect unique geologic or physical features?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
<td>Will the activity have potential effects to inhabitants, natural landscapes, or flora/fauna downstream from the activity site?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td>Will the activity have a direct or indirect effect, or include actions with mangroves, coral reefs and other marine/coastal ecosystems?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>GLOBAL CLIMATE CHANGE</strong></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>25</td>
<td>Are activity activities or outcomes vulnerable to changes in the weather or climate such as changes in precipitation patterns, increased temperatures or sea level rise?</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>26</td>
<td>Does the activity’s activities exacerbate climate change vulnerabilities (i.e., drought, flooding, decrease water supply)?</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>27</td>
<td>Will the activity create greenhouse gas emissions from decomposing waste, burning of organic matter, or use of fossil fuels etc. (consider duration and scale)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td><strong>SOCIO ECONOMIC</strong></td>
<td></td>
<td></td>
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<tr>
<td>28</td>
<td>Will the activity contribute to displacement of people, housing or businesses?</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>29</td>
<td>Will the activity affect indigenous peoples and/or unique cultural or historical features?</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>30</td>
<td>Will the activity expose people or property to flooding?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>ENVIRONMENT &amp; HEALTH</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>Will the activity create conditions encouraging an increase in illness, diseases, or disease vectors (waterborne, STDs or other)?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>32</td>
<td>Will the activity generate hazards or barriers for pedestrians, motorists or persons with disabilities?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>Will the activity involve the use, storage, handling or disposal of syringes, gauzes, gloves and other biohazard medical waste?</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>34</td>
<td>Will the activity expose workers to occupational hazards?</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>35</td>
<td>Will the activity increase existing noise levels?</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td><strong>GENDER</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>36</td>
<td>Does the activity activity inhibit the equal involvement of men and women?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>37</td>
<td>Do the activity results disproportionately benefit/impact men and women?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>OTHER</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>38</td>
<td>Does the activity/activity involve a sub-award component?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>39</td>
<td>Is an operations and maintenance plan required? (for all type of infrastructure, equipment, road rehabilitation, or water and sanitation action = Yes)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

(a) The activity has no potential for significant effects on the environment. No further environmental review is required (Categorical Exclusion). No further action required.

(b) The activity includes mitigation measures and design criteria that if, applied will avoid a significant effect on the environment (Negative Determination with Conditions). EMMP Required.
Construction activities need to be reviewed for scale, planned use, building code needs and maintenance. New construction having a footprint larger than 1000 meters$^2$ or 10,000 feet$^2$ is considered large scale and high risk. Some small construction activities, such as building an entrance sign to a park, may require simple mitigation measures whereas larger buildings will require more extensive review and monitoring.

New construction of roads 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.

Pursuant to FAA, section 611, Completion of Plans and Cost Estimates.

The purchase of packaged store pesticides are included. The planned procurement and/or use or training on the use 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 activity.

Any activities that involve the commercial harvesting of trees or converting forests is considered high risk and will require a full environmental assessment of the activity (i.e. Positive Determination). The reference to cutting trees of greater than 20cm dbh is for actions related to forest management and commercial forest products and not for individual trees being cut for construction or non-commercial purpose.

Less than 50 meters is based on best practices from US Federal and State regulations.

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

If the Activity includes a sub-award component, each sub-awardee shall be required to prepare an EMMP prior to implementation of the sub-award.

---

1 Construction activities need to be reviewed for scale, planned use, building code needs and maintenance. New construction having a footprint larger than 1000 meters$^2$ or 10,000 feet$^2$ is considered large scale and high risk. Some small construction activities, 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 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 Pursuant to FAA, section 611, Completion of Plans and Cost Estimates.

4 The purchase of packaged store pesticides are included. The planned procurement and/or use or training on the use 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 activity.

5 Any activities that involve the commercial harvesting of trees or converting forests is considered high risk and will require a full environmental assessment of the activity (i.e. Positive Determination). The reference to cutting trees of greater than 20cm dbh is for actions related to forest management and commercial forest products and not for individual trees being cut for construction or non-commercial purpose.

6 Less than 50 meters is based on best practices from US Federal and State regulations.

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

8 If the Activity includes a sub-award component, each sub-awardee shall be required to prepare an EMMP prior to implementation of the sub-award.
## Appendix 2. Environmental Mitigation Plan (Table 2)

Enter the Question/Row # of the potential negative effects 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 Environmental Effect</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>

* Please be as specific as possible. Sample mitigation measures are located in 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.
### Appendix 3. Environmental Monitoring Table (Table 3)

<table>
<thead>
<tr>
<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>Estimated Cost of implementing mitigation measures and monitoring</th>
<th>Results</th>
<th>Recommended Adjustments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Indicators of implementation and effectiveness of indicators</td>
<td>Methods</td>
<td>Frequency</td>
<td>Dates Monitored</td>
<td>Problems Encountered</td>
</tr>
<tr>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>5</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

**Award Number:**

**Activity Name:**

**Implementing Partner:**

**Location Name:**

**Nearby Communities:**

**Senior Activity Manager:**

**Monitoring Period:**

**Date:**
### Project-Level Climate Risk Management Summary Table

**To be included in IEE**

**CRIME AND VIOLENCE IN TARGETED MUNICIPALITIES REDUCED PROJECT 519-0468**

In order to document the climate risk management process and its results, the below table must be completed and included in the Summary of Conclusions from Analyses section of the PAD and the Project's Initial Environment Examination (IEE), if applicable. In addition, the PAD narrative must contain a summary of the climate risk assessment methodology and the main results of the assessment. See "Climate Risk Management for USAID Projects and Activities" for more information.

<table>
<thead>
<tr>
<th>Defined or Anticipated Project Elements (Purpose/ Sub-purpose, Areas of Focus, or Activities/Mechanisms, etc.)</th>
<th>Time Frame</th>
<th>Geography</th>
<th>Climate Risks</th>
<th>Risk Rating</th>
<th>How Risks Addressed at Project Level</th>
<th>Risks Addressed or Further Analysis to be Conducted in Activity Design/Implementation</th>
<th>Opportunities to Strengthen Climate Resilience</th>
<th>Next Steps</th>
</tr>
</thead>
<tbody>
<tr>
<td>IR 1.2.1 Broad based engagement in crime prevention efforts at the local level increased</td>
<td>10 years</td>
<td>National, urban and peri-urban</td>
<td>* Precipitation / flooding / landslides Due to increase in frequency and severity of rain storm events, urban areas may be at higher risk of flooding and landslides.</td>
<td>Low</td>
<td>Consider opportunities to increase awareness on climate risks to project.</td>
<td>Consider including interventions that increase awareness on climate risks, e.g., climate risk talks to prevention committees; include crime risk considerations in activities in new municipalities.</td>
<td>Increased awareness on climate risks. Could include climate risk talks to prevention committees and/or crime risk considerations in activities in new municipalities.</td>
<td>Environmental and CRM evaluation will be conducted on Parque Cuscatlan and will consider specific climate risks. Ensure new activities include language encouraging implementing partners to consider climate risk management.</td>
</tr>
<tr>
<td>Defined or Anticipated Project Elements (Purpose/ Sub-purpose, Areas of Focus, or Activities/Mechanisms, etc.)</td>
<td>Time Frame</td>
<td>Geography</td>
<td>Climate Risks</td>
<td>Risk Rating</td>
<td>How Risks Addressed at Project Level</td>
<td>Risks Addressed or Further Analysis to be Conducted in Activity Design/ Implementation</td>
<td>Opportunities to Strengthen Climate Resilience</td>
<td>Next Steps</td>
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<tr>
<td>IR 1.2.2 Community policing in high risk municipalities expanded</td>
<td>10 years</td>
<td>National, urban and peri-urban</td>
<td>* Precipitation / flooding / landslides Due to increase in frequency and severity of rain storm events urban areas may be at higher risk of flooding and landslides</td>
<td>Low</td>
<td>Consider opportunities to increase awareness on climate risks to project.</td>
<td>Consider including interventions that increase awareness on climate risks, e.g., include climate risk considerations in community policing training.</td>
<td>Increase awareness on climate risks. Could include climate risk considerations in community policing training.</td>
<td>Ensure new activities include language encouraging implementing partners to consider climate risk management.</td>
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<tr>
<td>IR 1.2.3 Youth access to quality education opportunities increased</td>
<td>10 years</td>
<td>National, urban and peri-urban</td>
<td>* Precipitation / flooding / landslides Due to increase in frequency and severity of rain storm events urban areas may be at higher risk of flooding and landslides</td>
<td>Moderate</td>
<td>Consider opportunities to increase awareness on climate risks to project.</td>
<td>Consider including interventions that increase awareness on climate risks, e.g., provide evacuation plans and conduct drills in schools. Small-scale reconstruction will include climate risk considerations in the EMMP. DG will do a comparative analysis of climate risk levels in target municipalities.</td>
<td>Increase awareness on climate risks. Could include support for evacuation plans and emergency drills in schools. Small-scale reconstruction will include climate risk considerations in the EMMP. DG will do a comparative analysis of climate risk levels in target municipalities.</td>
<td>Ensure new activities include language encouraging implementing partners to consider climate risk management.</td>
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