## ENVIROMENTAL THRESHOLD DECISION

<table>
<thead>
<tr>
<th>Activity Location:</th>
<th>Central America and Mexico</th>
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<tbody>
<tr>
<td>Activity Title:</td>
<td>Regional Citizen Security and Human Rights Project</td>
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<tr>
<td>Activity Number:</td>
<td>596-0205</td>
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<tr>
<td>Life-of-Activity Funding:</td>
<td>$110 million</td>
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<td>Life-of-Activity:</td>
<td>FY 2015 – FY 2019</td>
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</tbody>
</table>
| IEE prepared by:   | Dorita de Gutiérrez, Strategic Development Office  
Joy Searcie, Democracy and Governance Office (DG) |
| Reference ETDs:    | None                        |
| Recommended Threshold Decision: | Categorical Exclusion  
Negative Determination with Conditions |
| Bureau Threshold Decision: | Concur with recommendation |

**Comments:**

A **Categorical Exclusion** is issued to the Regional Citizen Security and Human Rights Project for all Sub-Purposes and Outputs actions under this Project that do not include a grant/sub-grant component nor small scale renovations/rehabilitation/reconstruction:

- **Sub-Purpose 1: Regional Capacity to Address Citizen Security Through More Coordinated Governance Systems**
  - Increased Regional Capacity for Citizen Security Data Collection and Analysis.
Sustainable Regional Capacity for Violence Prevention and Interruption Increased.

• Sub-Purpose 2: Human Rights Standards and Protection Systems Strengthened
  » Human Rights Education, Data Collection, and Public Policy Research Improved.
  » Regional Cooperation of Human Rights Authorities and Human Rights Defenders Improved to Address Rights Violations
  » Regional Early Warning and Threat Assessment Mechanisms Strengthened
  » Human Rights Strategic Litigation and Protection Support Services Improved

This Categorical Exclusion is issued according to 22 CFR 216.2(c)(2):

(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);

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

(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.).

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

A Negative Determination with Conditions is issued to the Regional Citizen Security and Human Rights Project for the following Sub-Purposes and Outputs:

• Sub-Purpose 1: Regional Capacity to Address Citizen Security Through More Coordinated Governance Systems
  » Increased Regional Capacity for Citizen Security Data Collection and Analysis.
  » Sustainable Regional Capacity for Violence Prevention and Interruption 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 using the EMMP form. 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: Human Rights Standards and Protection Systems Strengthened
  » Human Rights Education, Data Collection, and Public Policy Research Improved.
  » Regional Cooperation of Human Rights Authorities and Human Rights Defenders Improved to Address Rights Violations
  » Regional Early Warning and Threat Assessment Mechanisms Strengthened
  » Human Rights Strategic Litigation and Protection Support Services Improved
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 using the EMMP form.

Also, the three Outputs include grants/sub-grants components and thus each grant/sub-grant requires an Environmental Mitigation and Monitoring Plan (EMMP).

Environmental conditions for the implementation of these activities include:

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

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

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

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

e) The Implementing Partner shall monitor the EMMPs by the 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 IP.

f) EMMP Monitoring Reports shall be prepared and submitted to the AOR/COR and MEO as per the contract terms for reporting. A final Environmental Compliance Monitoring Report shall be officially submitted to the AOR/COR, MEO, and REA for review and approval. This Environmental Compliance Report can be included in the IP’s Annual Report as required by the contract or agreement. Table 3 of the EMMP shall be used to compile mitigation measure monitoring results and serves as the basis for the Environmental Compliance Report. See the EMMP instructions attached to the EMMP for more details on the EMMP process.

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

h) Follow the Ministry of Environment and Natural Resources and Ministry of Public
Works guidelines of each country in the Region 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) y sus Reglamentos (Decreto Legislativo 17 21 de marzo 2000, Diario Oficial No. 73 Tomo No. 347, 12 de abril de 2000, y sus reformas D.L. No. 581, 18 octubre de 2001 y D.O. No. 206, Tomo No. 353, 31 de octubre de 2001) for El Salvador.

i) Follow the Municipal Building guidelines already approved by USAID within the LAC Bureau Environmental Guidelines, Chapters 2 and 5. Also, the USAID Sectoral Environmental Guidelines-GEMS should be used for preparation of the EMMPs. (http://http://www.usaidgems.org/sectorGuidelines.htm).

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

Other conditions of implementation include:

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

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

- Applicable best management practices to use within the EMMP process can be found in the USAID Sectoral Environmental Guidelines (http://www.usaidgems.org/bestPractice.htm) which replace the Environmental Guidelines for Development Activities in Latin America and Caribbean.

- An amendment of this IEE is required for any activity resulting in policy changes that
have the potential to affect negatively the environment, large scale construction and/or water system development, and other activities not yet designed and therefore not described in this document. As well, if agriculture-related activities (TBD) require the use of pesticides, the IP is responsible for applying the existing PERSUAP if available, or prepares a PERSUAP. Any activities involving large scale construction (over 1000 sq. meters), large infrastructure and/or large municipal scaled water system development, or other similar actions would require an IEE amendment to recommend a Positive Determination and the preparation of an Environmental Assessment.

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

- The IP 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.

Amendments

- Amendments to Initial Environmental Examinations (IEEs) and Requests for Categorical Exclusions 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.

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

Date: July 30, 2015
Copy to: Gregory Howell, Acting Mission Director
       Joyce Searcie, DG
       Dorita de Gutierrez, SDO
       Carl Seagrave, SDO
       Mary Rodríguez, MEO
       Joe Torres, REA

Copy to: Eric Kite, Jennifer Huynh, LAC/OLA
        Brennan Dorn, LAC/RSD

Copy to: IEE File

Attachments:

- Initial Environmental Examination

File: P:\LAC.RSD.PUB\RSDPUB\ENV\Reg 216\IEE\IEE15\LAC-IEE-15-41 ETD (CAM - Regional Citizen Security and Human Rights Project)
INITIAL ENVIRONMENTAL EXAMINATION (IEE)

Project Location: Central America and Mexico (CAM)

Project Title and Number: Regional Citizen Security and Human Rights Project, No. 596-0205

Development Objective (DO) Title and Number: Regional Citizen Security Improved, DO3

Life- of-Project Funding: $110,000,000

Life of Project: FY 2015 – FY 2019

Reference Threshold Decision: None. This is a new IEE for the new Citizen Security Improved Project, No. 596-0205, DO3 under the RDCS. The ETD for the activities under the past regional strategy activities was LAC-IEE-14-57.

IEE Prepared by: Dorita de Gutiérrez, Strategic Development Office
Joy Searcie, Democracy and Governance Office (DG)

Date Prepared: July 21, 2015

REO/MEO Recommended Threshold Decision: Categorical Exclusion; Negative Determination with Conditions
1. BACKGROUND AND PROJECT DESCRIPTION

The proposed Regional Development Cooperation Strategy (RDCS) for 2015-2019 for Central America and Mexico (CAM) states as its overall goal: “A more inclusive, prosperous, stable, and safe Central America region.” To achieve this goal, four Development Objectives (DOs) were identified:

- DO1: Regional economic integration increased
- DO2: Regional climate-smart economic growth enhanced
- DO3: Regional citizen security improved
- DO4: HIV prevalence in Central America contained

The proposed “Regional Citizen Security Improved Project” No. 596-0205 (“the Project”) will contribute directly to DO3: Regional Citizen Security Improved managed by the Democracy and Governance Office (DG), and its two Intermediate Results (IRs) 3.1: “Regional capacity to address citizen security through more coordinated governance systems,” and 3.2: “Human rights standards and protection systems strengthened.” The Project will complement bilateral interventions by increasing regional capacity and expertise, exchange of best practices, and the scale-up of effective models by addressing select cross-border citizen security and governance related challenges. Additionally, CAM will improve the region’s ability to protect human rights as an integral component of advancing security and development objectives in the region.

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 RDCS/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 RDCS. 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 RDCS’ DO3, Regional Citizen Security Improved Project (the Project).

The Total Estimated Cost of the Regional Citizen Security Improved Project is $110,000,000 and its end date is September 30, 2019.

Current activities under implementation were authorized under previous IEEs (LAC-IEE-14-57). This IEE incorporates the following ongoing activities presently covered under LAC-IEE-14-57, as they are continuing into the Project: (1) Youth and Community Development: El Salvador, Guatemala, and Honduras; (2) InfoSegura; and (3) Reception/In-Processing and Repatriation Assistance to Returning Families and Unaccompanied Children in the Northern Triangle of Central America.

Please note that the RDCS is in Phase III of its development with completion and approval expected in October 2015. The Project, proposed activities, and related analyses in this PAD are consistent with the RDCS, and CAM received guidance from the Bureau for Latin America and Caribbean Affairs (LAC Bureau) to proceed with PAD development. Upon approval of the RDCS, the PAD and this IEE will be reviewed and, if necessary, amended to ensure consistency with the final RDCS.
1.2 Background

The Project purpose is to focus on a comprehensive approach to crime and violence prevention and human rights protection. Project activities will complement bilateral interventions in each country by increasing regional capacity and expertise, exchange of best practices, and the scale-up of effective models by addressing select cross-border citizen security and governance related challenges. This includes increasing access to quality and comparative data and analysis on both citizen security and governance, identifying mechanisms for the effective dissemination and replication of best practices, formation of regional networks among key institutions, and targeted training and exposure on regional and international best practices for policy makers, key authorities, civil society and other stakeholders. Additionally, CAM will improve the region’s ability to protect human rights as an integral component of advancing security and development objectives in the region. Work will include strengthening transnational protection of vulnerable populations, especially in border areas; building civil society’s knowledge of and capacity to advocate for labor and human rights; establishing early warning and monitoring systems of human rights violations to enable improved response; and promoting freedom of expression and independence, particularly for media and journalists.

This Project purpose will be accomplished through the achievement of two Intermediate Results (IR) – hereby called Sub-Purposes: Sub-Purpose 1 (IR 3.1), Regional capacity to address citizen security through more coordinated governance systems; and Sub-Purpose 2 (IR 3.2), Human rights standards and protection systems strengthened.

1.3 Description of Sub-Purposes and Illustrative Activities

Sub-Purpose 1: Regional capacity to address citizen security through more coordinated governance systems

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

1.1 Increased Regional Capacity for Citizen Security Data Collection and Analysis
1.2 Dissemination of Citizen Security Best Practices through Regional Networks Expanded
1.3 Sustainable Regional Capacity for Violence Prevention and Interruption Increased

Output 1.1 Increased Regional Capacity for Citizen Security Data Collection and Analysis

**Illustrative Interventions**

- Develop key citizen security indicators that are comparable within the region and disaggregated to be tracked, disseminated and analyzed to inform both national and regional challenges.
- Develop and implement institutional capacity building plans to improve systems for data collection and analysis.
- Build the capacity of countries’ coordinating mechanisms (such as the Sub-Technical Units) to become the effective and permanent coordination structure to standardize and analyze key crime indicators. Activities may be carried out through grants/sub-grants and technical assistance.
- Develop a mechanism that would serve as a clearinghouse for regional information to be made available broadly. The information to be made available should include publicly available research, publications, and key citizen security indicators.
• Support regional efforts through grants/sub-grants and technical assistance to adopt state of the art citizen security practices, such as the Classification of Violence Indicators.
• Share and compare country analysis at the regional level, where countries can share and contrast their findings and analysis, and identify the types of policy recommendations that will address the issues identified in the analysis.
• Develop a regional research agenda with key themes of interest that pertain to several countries in the region and that require further investigation such as: the impact of transnational gangs and drug trafficking on crime in the region, the underlying cause for violence in the region, trafficking in persons, youth surveys, and gender-based violence.
• Provide grants/sub-grants to commission specific data gathering and analysis to be done around the prioritized regional research issues.
• Development of perception surveys that measure the level of confidence and trust in government institutions, and perceptions of safety and citizen security.
• Develop GIS mapping of regional trends on citizen security issues.
• New activities may include grants/sub-grants to civil society organizations and small scale renovation/rehabilitation of facilities.

Output 1.2 Dissemination of Citizen Security Best Practices through Regional Networks Expanded

Illustrative interventions

• 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.
• Strengthen civil society networks and platforms on citizen security through joint research and analysis, and forums.
• Strengthen regional youth advocacy and networks for crime and violence prevention through technical assistance and grants/sub-grants.
• Strengthen civil society engagement with national governments through sharing of analysis and advocacy on policy recommendations.
• Identify and disseminate successful comparative regional perspectives to address crime and violence.
• Provide grants/sub-grants for the replication and expansion of successful models to address citizen security issues in the region.
• Foster engagement and networking of civil society organizations including the private sector, youth, faith-based organizations, NGOs, academia, and think tank organizations on regional citizen security issues across the region.
• Engage business leaders in the region to disseminate and generate awareness of best practices for social investment on crime and violence prevention in the region.
• Promote discussion forums to share relevant experiences and approaches from the region and from other countries that effectively tackle citizen security issues.
• Facilitate conferences and other knowledge sharing events around key citizen security issues.
• Foster the development of regional forums and platforms to encourage greater private sector engagement in youth issues.
• Provide grants/sub-grants to consolidate and build the capacity of regional youth networks to foster youth advocacy and civic participation in the region.
• New activities may include grants/sub-grants to civil society organizations and small scale renovation/rehabilitation of facilities.
Output 1.3 Sustainable Regional Capacity for Violence Prevention and Interruption Increased

Illustrative interventions:

- Develop and implement a curriculum for the certified training of regional key stakeholders (individuals, groups, organizations) on citizen security and governance matters.
- Identify, test, and disseminate new and innovative approaches to citizen security strategies and adapt various crime prevention models region wide. Activities may include grants/sub-grants to civil society organizations small scale renovation/rehabilitation of facilities and.
- Compiling and systematization of successful models, techniques, tools and approaches on citizen security.
- Testing new methodologies and innovative crime prevention models, assessing impact in different contexts and evaluating the models for potential replication.
- Promote documentation of existing best practice models, lessons learned and approaches for scale-up in different operating contexts especially in all phases of crime prevention.
- Fostering different learning opportunities to increase the capacity of violence prevention practitioners to design, implement, monitor and evaluate successful citizen security approaches.
- Develop service learning fellowships & seminar series for youth to serve as a platform to develop leaders and active citizens through service learning.
- Develop youth leadership initiatives (e.g. forums, trainings) to foster the creation of a space for youth to advocate on issues, most pertinent to their positive development and advancement, such as civic participation and citizen security. Activities may include grants/sub-grants to civil society organizations and technical assistance.
- Conduct multidisciplinary trainings for social workers, educators, ministries of justice, ministries of security, managers, police, journalists, advocates, community leaders, and service providers to foster exchange of best practices and learning opportunities to better address the violence and governance related issues of the region. Activities may include grants/sub-grants to local civil society organizations and technical assistance.
- Develop and support a network of certified and qualified violence prevention practitioners who would contribute with their skills, knowledge, experiences and technical assistance to the design and implementation of citizen security national and regional interventions.
- New activities may include grants/sub-grants to civil society organizations and small scale renovation/rehabilitation of facilities.

Sub-Purpose 2: Human Rights Standards and Protection Systems Strengthened

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

2.1 Human Rights Education, Data Collection, and Public Policy Research Improved
2.2 Regional Cooperation of Human Rights Authorities and Human Rights Defenders Improved to Address Rights Violations
2.3 Regional Early Warning and Threat Assessment Mechanisms Strengthened
2.4 Human Rights Strategic Litigation and Protection Support Services Improved

Output 2.1 Human Rights Education, Data Collection and Public Policy Research Improved

Illustrative Interventions
- Facilitate a regional advisory network and/or working group of leading experts in human rights education and awareness raising to establish goals, standards, protocols, themes, and content for education, training, and strategic communications;
- Engage ombudsman offices, and training center administrators in advancing the incorporation of human rights into formal academic curriculum in accordance with OAS resolutions and into continuing education and professional training;
- Support development and/or implementation of national human rights education plans;
- Support development of human rights learning guides, online and distance learning resources and portals, human rights student associations, human rights film festivals, photo and art exhibits, and rights awareness advertising in public spaces;
- Engage journalists, media outlets, and social communicators to generate public campaigns on salient human rights issues, United Nations/international days on human rights (general and specific topics), and documentaries, call-ins, and virtual gatherings (e.g. Google Hangouts);
- Organize and manage a working group of university-affiliated academics and practitioners to spearhead region-wide data collection, research, and analysis of human rights issues, policies, and practice;
- Identify mechanisms to improve the quality of human rights data especially on key issues such as disappearances, trafficking in persons, migration, violence against human rights defenders, journalists, etc; activities may include grants/sub-grants to local organizations.
- Provide technical assistance to develop a human rights research agenda and implementation plan that examine root causes, contemporary challenges, and emerging human rights issues;
- Create and manage a virtual platform to promote data sharing, and dissemination of final studies and other outputs;
- Strengthen governments’ (e.g. ombudsman offices, judicial, migration officials) capacity for improved information registration, processing, analysis, and communication;
- Generate improved migration information to contribute to the decision making of all stakeholders involved in the reception, assistance, and reintegration of returning and potential migrants.
- Develop regional open-source data collection management and information sharing protocols with Northern Triangle migration authorities to track, map and monitor migratory flows.
- New activities may include grants/sub-grants to civil society organizations and small scale renovation/rehabilitation of facilities.

**Output 2.2 Regional Cooperation of Human Rights Authorities and Human Rights Defenders Improved to Address Rights Violations**

**Illustrative interventions**

- Support formal networking of national human rights authorities in regional and international fora (i.e. Public Defenders, Attorney General Networks, Ombudsman Offices etc);
- Provide assistance in convening and structuring high level dialogues to identify modes of cooperating on regional human rights issues and challenges;
- Establish regional task forces and focal points among national human rights authorities to lead engagement on common human rights challenges;
- Convene a series of regional fora to link national human rights authorities with new communities of practice, institutions and actors, and to broaden the constituency and partners for human rights protection and assistance; and
- Facilitate protocols and platforms for sharing of information, leading practices, and comparative approaches;
Support national and regional networks of human rights defenders and journalists for peer to peer learning, professional development, and collaboration in addressing significant human rights challenges; activities may include grants/sub-grants to civil society organizations.

Compile and disseminate good practices and tools for more effective human rights monitoring and documentation, engaging and assisting victims, and conduct of strategic litigation;

Provide technical assistance in the adoption and use of information and communication technologies and social media tools for human rights documentation, and advocacy;

Identify and disseminate successful rapid response emergency protection mechanisms for civil society representatives and organizations; activities may include grants/sub-grants to civil society organizations.

Provide training in all aspects of security, e.g. physical, digital, and psycho-social, and measures for self-protection;

Develop reference guides and technical resources for accessing United Nations and Interamerican human rights enforcement mechanisms;

Organize workshops and trainings on strategic litigation and treaty body petitioning strategies, case selection criteria, and drafting and trial advocacy skills;

Provide technical assistance in developing and managing tools to coordinate and monitor strategic litigation cases.

New activities may include grants/sub-grants to civil society organizations and small scale renovation/rehabilitation of facilities.

Output 2.3 Regional Early Warning and Threat Assessment Mechanisms Strengthened

Illustrative interventions:

- Undertake a region-wide needs assessment and stakeholder analysis to identify existing mechanisms and processes for early warning and threat assessment;
- Provide assistance to competent authorities, including ombudsman satellite offices, in establishing and strengthening early warning and threat assessment units at local level throughout the region;
- Support development and implementation of standing operating procedures to effectively and efficiently identify, analyze, and issue early warning and threat assessment reports;
- Equip operational units with tools and resources to identify, map, track, and analyze threats and violations;
- Provide technical assistance in establishing and/or strengthening the operation of inter-institutional commissions and other threat assessment units;
- Convene consultations and other fora to involve civil society and media in early warning and threat assessment processes;
- Develop baselines, information systems, and mapping on migrants and returned migrants to help identify and understand potential migrants and their needs.
- New activities may include grants/sub-grants to civil society organizations and small scale renovation/rehabilitation of facilities.

Output 2.4 Human Rights Strategic Litigation and Protection Support Services Improved

Illustrative interventions

- Enhance capacity of civil society organizations and regional institutions to provide victims and their families with specialized services, including legal assistance; activities may include
grants/sub-grants to civil society organizations and small scale renovation/rehabilitation of facilities.

- Provide technical assistance to strengthen the normative framework for victims assistance and support services, including legal aid, based on best practices and international standards;
- Establish protocols and standard operating procedures for creation and management of victims assistance referral networks, hotlines, and awareness raising campaigns;
- Assist in the introduction and/or management of victim registries on the basis of standardized protocols and best practices;
- Assist justice sector institutions and actors develop capacity to investigate and prosecute serious human rights violations;
- Strengthen sensitivity of justice sector institutions and actors towards victims and improve use of witness protection measures through training and education;
- Strengthen capacity of public defenders to assist victims of human rights abuse by leveraging the legal profession, bar associations, and non-governmental organizations in providing legal assistance;
- Support relevant national entities and civil society organizations in providing immediate post arrival assistance to returning migrant families and children.
- Strengthen migration management and integrated border management capacities in the region for processing and assisting returning migrants in points of entry and migrant shelters.
- Provide support services to victims in cross-border areas who are exploited and discriminated.
- New activities may include grants/sub-grants to civil society organizations and small scale renovation/rehabilitation of facilities.

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. The purpose of the evaluation strategy is to measure program impact, results and achievements so the Mission can use empirical evidence for programming, learning, and adapting.

1.4 Locations Affected and Existing Conditions:

Assistance activities under this Project will be implemented particularly in the Northern Triangle countries, i.e., Guatemala, El Salvador, and Honduras. However, some of the activity implementation may need to be coordinated in Mexico and in all member states of the Central American Integration System (SICA): Belize, Costa Rica, Dominican Republic, El Salvador, Guatemala, Honduras, Nicaragua, and Panama countries. The RDCS and Project will also consider cross-border opportunities and partnership with Mexico within the context of addressing Central American challenges. USAID/El Salvador’s Central America Regional program (CAM) supports governments’ efforts to improve crime and violence prevention and human rights protection.

Crime and violence remain a key development challenge for Mexico and Central American countries. In the Northern Triangle crime rates are among the highest in the world. The region faces alarming levels of impunity in homicides and gender-based violence, including trafficking in persons, a lack of justice mechanisms to effectively handle criminal cases, and improper systems to track and report on disappearances and trafficking of persons. Also, human rights violations related to citizen security in the region are at a critical level.

Central America remains the least developed sub-region in the hemisphere, and given its proximity to the U.S., the problems that plague it directly affect U.S. interests. Violence and insecurity inhibit investment
and economic growth in Central America, driving undocumented immigration to the U.S. as people flee in search of security and economic opportunities. Children and youth are particularly vulnerable, and governments are witnessing an increasing mass migration of unaccompanied migrant children (UACs) from Central America and Mexico, in addition to traditional migration flows. According to figures from the U.S. Department of Health and Human Services (HHS), the number of UACs crossing the border during 2013 exceeded 24,000. By July 2014, this number reached 57,000 according to the Department of Homeland Security (DHS).

The Project will strengthen activities addressing citizen security and human rights areas across the region. Some activities will use local facilities such as community centers and schools, and it is anticipated that some of these facilities may be in disrepair and unable to foster a productive safe environment for the community members. Therefore, there would be a need to improve these facilities through small scale renovations/rehabilitation/reconstruction. The Project will provide small grants/sub-grants to civil society organizations /groups in the region to carry out activities.

1.5 National Environmental Policies, Procedures or Regulations

Construction actions supported by this Project will comply with each country’s national environmental laws, policies, procedures and regulations, as applicable. All construction and security/law enforcement laws and regulations for each of the participating countries will be followed as well as the laws and regulations of the US. Construction will be done to meet US standards. The USAID Environmental Guidelines for Small Scale Construction will also be followed which provide direction on US construction standards.

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

Small grants/sub-grants components of activities can lead to potential impacts as the specific actions of these grants/sub-grants are not known as the time of the approval of this IEE. Thus, each grant/sub-grant will be required to submit an EMMP for approval by the Implementing Partner and MEO.
Activities implemented under Sub-Purpose 1, Regional Capacity to Address Citizen Security through More Coordinated Governance Systems, 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 in each participating country with governments and representatives of the private sector, youth, faith-based organizations, academia, NGOs, community leaders, grass-root organizations and their leaders to address crime and violence and human rights. Activities under Outputs 1.1 Increased Regional Capacity for Citizen Security Data Collection and Analysis; 1.2 Dissemination of Citizen Security Best Practices through Regional Networks Expanded; and 1.3 Sustainable regional capacity for violence prevention and interruption increased, may include small scale reconstruction and/or rehabilitation for improving facilities that are in disrepair, inadequate or unsafe to be used. Small scale reconstruction may also include improving primary services systems, such as small scale water systems, and making adaptations for accessibility for persons with disabilities. Additionally, under the three Outputs the Project will provide grants/sub-grants to civil society organizations that offer services addressing crime and violence prevention at the community level.

Activities carried out under Sub-Purpose 2, Human Rights Standards and Protection Systems Strengthened will strengthen the capacities of national human rights protection systems in Central America. Activities under Outputs 2.1 Human rights education, data collection and public policy research improved; 2.2 Regional Cooperation of Human Rights Authorities and Human Rights Defenders Improved to Address Rights Violations; 2.3 Regional Early Warning and Threat Assessment Mechanisms Strengthened; and 2.4 Human Rights Strategic Litigation and Protection Support Services Improved may include small scale renovations/rehabilitation/reconstruction 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 the three Outputs the Project may provide grants/sub-grants to civil society organizations to implement a systems approach to human rights protection and promotion.

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;
- (xiii) Studies, projects, or programs intended to develop the capability of the recipient country to engage in development planning; except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.)

A 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 renovations/rehabilitation/reconstruction

- Sub-Purpose 1: Regional Capacity to Address Citizen Security Through More Coordinated Governance Systems
  - Increased Regional Capacity for Citizen Security Data Collection and Analysis.
Sustainable Regional Capacity for Violence Prevention and Interruption Increased.

- Sub-Purpose 2: Human Rights Standards and Protection Systems Strengthened
  - Regional Cooperation of Human Rights Authorities and Human Rights Defenders Improved to Address Rights Violations
  - Regional Early Warning and Threat Assessment Mechanisms Strengthened
  - Human Rights Strategic Litigation and Protection Support Services Improved

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

A **Negative Determination with Conditions** is proposed for the following Sub-Purposes and Outputs:

- **Sub-Purpose 1: Regional Capacity to Address Citizen Security Through More Coordinated Governance Systems**
  - Increased Regional Capacity for Citizen Security Data Collection and Analysis.
  - Sustainable Regional Capacity for Violence Prevention and Interruption 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 using the EMMP form.

  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: Human Rights Standards and Protection Systems Strengthened**
  - Regional Cooperation of Human Rights Authorities and Human Rights Defenders Improved to Address Rights Violations
  - Regional Early Warning and Threat Assessment Mechanisms Strengthened
  - Human Rights Strategic Litigation and Protection Support Services Improved

  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 using the EMMP form.

  Also, the three Outputs include grants/sub-grants components and thus each grant/sub-grant requires an Environmental Mitigation and Monitoring Plan (EMMP).

### 3.2 Mitigation, Monitoring, and Evaluation

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

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

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

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

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

f) EMMP Monitoring Reports shall be prepared and submitted to the AOR/COR and MEO as per the contract terms for reporting. A final Environmental Compliance Monitoring Report shall be officially submitted to the AOR/COR, MEO, and REA for review and approval. This Environmental Compliance Report can be included in the Implementing Partner’s Annual Report as required by the contract or agreement. Table 3 of the EMMP shall be used to compile mitigation measure monitoring results and serves as the basis for the Environmental Compliance Report. See the EMMP instructions attached to the EMMP for more details on the EMMP process.

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

h) Follow the Ministry of Environment and Natural Resources and Ministry of Public Works guidelines of each country in the Region 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) y sus Reglamentos (Decreto Legislativo 17 21 de marzo 2000, Diario Oficial No. 73 Tomo No. 347, 12 de abril de 2000, y sus reformas D.L. No. 581, 18 octubre de 2001 y D.O. No. 206, Tomo No. 353, 31 de octubre de 2001) for El Salvador.

i) Follow the Municipal Building guidelines already approved by USAID within the LAC Bureau Environmental Guidelines, Chapters 2 and 5. Also, the USAID Environmental Guidelines-GEMS should be used for preparation of the EMMPs.

(http://www.usaid/locations/latin_america_caribbean/environment/docs/epiq/epiq.html)
(http://www.usaidgems.org/sectorGuidelines.htm)

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

Recommended Conditions:
• Each activity manager or Contracting (or Agreement) Officer Representative (COR or AOR) is responsible for making sure environmental conditions are met (ADS 204.3.4). In addition, CORs/AORs are responsible for ensuring that appropriate environmental guidelines are followed, mitigation measures in the IEE are funded and implemented, and that adequate monitoring and evaluation protocols are in place to ensure implementation of mitigation measures. The COR/AOR and Chief of Party for implementing mechanisms (TBD) will require the use of the Environmental Mitigation and Monitoring Plan (EMMP) (attached) for those activities (TBD)
involving small grants/sub-grants, small scale construction, small water and sanitation systems, and protection/restoration of water sources. The EMMP will be used for all of the activities listed within this IEE that receive a Negative Determination with Conditions threshold decision.

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

- Applicable best management practices to use within the EMMP process can be found in the USAID Sectoral Environmental Guidelines (http://www.usaidgems.org/bestPractice.htm) which replace the Environmental Guidelines for Development Activities in Latin America and Caribbean.

- An amendment of this IEE is required for any activity resulting in policy changes that have the potential to affect negatively the environment, large scale construction and/or water system development, and other activities not yet designed and therefore not described in this document. As well, if agriculture-related activities (TBD) require the use of pesticides, the implementing partner is responsible for applying the existing PERSUAP if available, or prepares a PERSUAP. Any activities involving large scale construction (over 1000 sq. meters), large infrastructure and/or large municipal scaled water system development, or other similar actions would require an IEE amendment to recommend a Positive Determination and the preparation of an Environmental Assessment.

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

- The implementing partner will ensure that all activities conducted under this instrument comply with this ETD. Also, through its regular reporting requirements, a section on environmental compliance (e.g. mitigation monitoring results) will be included using Table 3 of the EMMP as a monitoring tool for documenting the monitoring results.

### 3.3 Environmental Compliance Language for Contracts and Agreements

The following language is to be inserted into all solicitations (RFP, RFA, APS, GDA, etc.) to tell partners how the Agency expects them to comply with 22 Code of Federal Regulations 216.

“In accordance with USAID’s recognition that gender, persons with disabilities, anti-corruption, and environmental issues are important considerations in development, the Contractor shall include in their project proposal explanations on measures they intend to take to deal with these issues. During project implementation, the Contractor/Recipient shall take these issues into account and find ways to enhance gender balance, reduce corrupt practices, and protect the environment in areas related to their project. To ensure compliance with the USAID environmental regulation 22 CFR 216, the Implementing Partner (IP)
is responsible for providing USAID with an Environmental Mitigation Plan, as outlined in the applicable document (attached) “Guidelines for Implementing Partners on the USAID Environmental Mitigation and Monitoring Plan (EMMP).” The Implementing Partner shall ensure that appropriate environmental guidelines are followed, 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. The procurement and/or use of pesticides would require an amended IEE, pursuant to USAID’s Pesticide Procedures 22 CFR 216.3(b) (l) (i) (a-l). The Contractor/Recipient may be required to report results disaggregated by gender and measures taken to enhance the inclusion of persons with disabilities, the environment and reduce corrupt practices.”

Contract Officers will use the Annex document 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, for including appropriate compliance language in all solicitations and awards.

**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

July 16th, 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

¹ This replaces all previous Environmental Mitigation Plan and Report (EMPR) forms
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).

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 include 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).

Figure 1: Timeline of reporting requirements for the Environmental Mitigation and Monitoring Plan (EMMP)

- IP submits draft EMMP
- USAID approves EMMP before implementation

Year 1
Activity Implementation
- IP submits Environmental Compliance Report (ECR) end of year 1, and receives approval for the Annual EMMP for year 2

Year 2
Activity Implementation
- IP submits Environmental Compliance Report (ECR) end of year 2, and receives approval for the Annual EMMP for year 3

Year 3
Activity Implementation/Project completion
- IP submits Environmental Compliance Report (ECR) end of year 3, and receives approval for the Annual EMMP for year 4, or:
- IP submits a Final ECR at the end of the project.
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 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 into 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>
</table>

<table>
<thead>
<tr>
<th>Column A</th>
<th>Yes</th>
<th>Column B</th>
<th>No</th>
</tr>
</thead>
</table>

**Column C**
- If answered yes to Column A, is it a high risk or medium risk?

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

<table>
<thead>
<tr>
<th>Column Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>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.³</td>
</tr>
<tr>
<td>2</td>
<td>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.</td>
</tr>
<tr>
<td>3</td>
<td>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.</td>
</tr>
<tr>
<td>4</td>
<td>Will the activity involve construction or rehabilitation of any other infrastructure such as landfills, incinerators, energy infrastructure, etc.</td>
</tr>
<tr>
<td>5</td>
<td>Will the infrastructure activity cost more than US $500,000²? 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).</td>
</tr>
<tr>
<td>6</td>
<td>Does the activity require adherence to national building code or other national regulatory standard? Mitigation measures in Table 2.</td>
</tr>
<tr>
<td>7</td>
<td>Does the activity require local planning permissions (i.e zoning, building permits, etc.)</td>
</tr>
</tbody>
</table>

### BIOPHYSICAL

<table>
<thead>
<tr>
<th>Column Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Will the activity involve the purchase, use, plans to use, or training in the use of pesticides⁴ (including bio pesticides like neem)?</td>
</tr>
<tr>
<td>9</td>
<td>Will the activity involve changes in water quality (pollution, sedimentation, stagnation, salinization, temperature change, etc.)</td>
</tr>
<tr>
<td>10</td>
<td>Will the activity affect surface or groundwater quantity</td>
</tr>
<tr>
<td>11</td>
<td>Will the activity involve training and/or implementation of agricultural practices/production including animal husbandry?</td>
</tr>
<tr>
<td>12</td>
<td>Will the activity involve aquaculture systems?</td>
</tr>
<tr>
<td>13</td>
<td>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.</td>
</tr>
<tr>
<td>14</td>
<td>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 &gt;20cm diameter at base height (DBH)?</td>
</tr>
<tr>
<td></td>
<td>Question</td>
</tr>
<tr>
<td>---</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>15</td>
<td>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?</td>
</tr>
<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>
</tr>
<tr>
<td>17</td>
<td>Will the activity create objectionable odors?</td>
</tr>
<tr>
<td>18</td>
<td>Will the activity occur on steep slopes (greater than 15%)?</td>
</tr>
<tr>
<td>19</td>
<td>Will the activity contribute to erosion?</td>
</tr>
<tr>
<td>20</td>
<td>Will the activity change existing land use in the vicinity?</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>
</tr>
<tr>
<td>22</td>
<td>Will the activity affect unique geologic or physical features?</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>
</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>
</tr>
<tr>
<td></td>
<td><strong>GLOBAL CLIMATE CHANGE</strong></td>
</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>
</tr>
<tr>
<td>26</td>
<td>Does the activity’s activities exacerbate climate change vulnerabilities (i.e., drought, flooding, decrease water supply)?</td>
</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>
</tr>
<tr>
<td></td>
<td><strong>SOCI ECONOMIC</strong></td>
</tr>
<tr>
<td>28</td>
<td>Will the activity contribute to displacement of people, housing or businesses?</td>
</tr>
<tr>
<td>29</td>
<td>Will the activity affect indigenous peoples and/or unique cultural or historical features?</td>
</tr>
<tr>
<td>30</td>
<td>Will the activity expose people or property to flooding?</td>
</tr>
<tr>
<td></td>
<td><strong>ENVIRONMENT &amp; HEALTH</strong></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>
</tr>
<tr>
<td>32</td>
<td>Will the activity generate hazards or barriers for pedestrians, motorists or persons with disabilities?</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>
</tr>
<tr>
<td>34</td>
<td>Will the activity expose workers to occupational hazards?</td>
</tr>
<tr>
<td>35</td>
<td>Will the activity increase existing noise levels?</td>
</tr>
<tr>
<td></td>
<td><strong>GENDER</strong></td>
</tr>
<tr>
<td>36</td>
<td>Does the activity activity inhibit the equal involvement of men and women?</td>
</tr>
<tr>
<td>37</td>
<td>Do the activity results disproportionately benefit/impact men and women?</td>
</tr>
<tr>
<td></td>
<td><strong>OTHER</strong></td>
</tr>
<tr>
<td>38</td>
<td>Does the activity/activity involve a sub-award component?</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>
</tr>
</tbody>
</table>
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.

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.

---

### RECOMMENDED ACTION (Check Appropriate Action):

<table>
<thead>
<tr>
<th>(a)</th>
<th>The activity has no potential for significant effects on the environment. No further environmental review is required (Categorical Exclusion). No further action required.</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)</td>
<td>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.</td>
</tr>
<tr>
<td>(c)</td>
<td>The activity has potentially substantial or significant adverse environmental effects, therefore, an EA is required before activity implementation (Positive Determination). NOTE: if any question is marked as High Risk, an EA is required and Tables 2 and 3 of the EMMP do not need to be completed.</td>
</tr>
<tr>
<td>(d)</td>
<td>The activity has significant adverse environmental effects that cannot be mitigated. Proposed mitigation is insufficient to eliminate these effects and alternatives are not feasible. The activity is not recommended for implementation. <em>For sub awards, do not fund.</em></td>
</tr>
</tbody>
</table>

---

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>Award Number:</th>
<th>Activity Name:</th>
<th>Implementing Partner:</th>
<th>Location Name:</th>
<th>Nearby Communities:</th>
<th>Senior Activity Manager:</th>
<th>Monitoring Period:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<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>Dates Monitored</th>
<th>Problems Encountered</th>
<th>Mitigation Effectiveness</th>
<th>Recommended Adjustments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Clearance Page:
Initial Environmental Examination (IEE) of Regional Citizen and Human Rights Project (PAD),
No. 596-0205

Drafted by:  SDO: Dorita de Gutiérrez  

Clearances:
SDO: Carl Seagrave 
A/DG: Joyce Searcie 
MEO: Mary de Rodriguez 
REA: Joe Torres 

Recommended for Approval:

Gregory Howell  
Acting Mission Director  

P:ado.pub/adopub/SO RULING JUSTLY CAM REGIONAL/PAD DO3JEE - Final.docx
Re: IEE for the DG Regional PAD

1 message

Fri, Jul 24, 2015 at 11:36 AM

Joe Torres <jotorres156@hotmail.com>
To: “Joe (USAID/SANTO DOMINGO/GDO) Torres” <jotorres@usaid.gov>, “dgutierrez@usaid.gov”
<dgutierrez@usaid.gov>, “mvelasquez@usaid.gov” <mvelasquez@usaid.gov>, “msaricio@usaid.gov”
<msaricio@usaid.gov>, “marodriguez@usaid.gov” <marodriguez@usaid.gov>

Hello Doria,
I have reviewed the IEE for the DG Regional CAM PAD. This email serves as my
recommended approval and signature for this new IEE.
As Mary Rodriguez is out of the office, this email also serves as her signature and
concurrency for this IEE. I am signing on her behalf.
Thank you for all of the edits and the team’s effort in completing this IEE.
Regards,
Joe Torres
REA CAM/Mexico
July 24, 2015

Sent from Windows Mail

From: Joe (USAID/SANTO DOMINGO/GDO) Torres
Sent: Thursday, July 23, 2015 11:28 PM
To: Joe Torres

Sent from my iPhone

Begin forwarded message:

From: Dora Gutierrez <dgutierrez@usaid.gov>
To: Joe Torres <jotorres@usaid.gov>
Cc: “Velasquez-Castro, Norma (San Salvador/SDO)” <mvelasquez-
castro@usaid.gov>, Joy Saracio <jsaricio@usaid.gov>, Mary Rodriguez
<marodriguez@usaid.gov>
Subject: IEE for the DG Regional PAD

Hello Joe!

This is reference to the IEE for the Regional PAD of the Regional
Citizen and Human Rights Project under the DG portfolio.
Attached is a copy of the revised IEE to which we have
incorporated your edits, changes, and additions and that we are circulating for clearance. Please review it and if you concur, provide us with your clearance by e-mail.

One additional question – since Mary de Rodríguez (MEO) is out of the office until August 10th, would you clear for her as well?

Gracias!