**US Agency for International Development (USAID)**

**USAID Armenia**

**Amendment to Initial Environmental Examination (IEE)**

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**Program/Project/Activity Data**

<table>
<thead>
<tr>
<th>Activity/Project Name:</th>
<th>A more participatory, effective, and accountable governance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assistance Objective:</td>
<td>Governing Justly and Democratically; Investing in People</td>
</tr>
<tr>
<td>Program Area:</td>
<td>A13, Social Services and Protection for Vulnerable Populations</td>
</tr>
<tr>
<td>Country(ies) and/or Operating Unit:</td>
<td>Armenia/E&amp;E</td>
</tr>
<tr>
<td>Originating Office:</td>
<td>Sustainable Development Office</td>
</tr>
<tr>
<td>Date:</td>
<td>November 28, 2017</td>
</tr>
<tr>
<td>PAD Level IEE:</td>
<td>Yes x No</td>
</tr>
<tr>
<td>Supplemental IEE:</td>
<td>Yes x No</td>
</tr>
<tr>
<td>RCE/IEE Amendment:</td>
<td>Yes x No</td>
</tr>
<tr>
<td>DCN of Original RCE/IEE:</td>
<td>2017-ARM-006</td>
</tr>
<tr>
<td>DCN of Amendment(s):</td>
<td></td>
</tr>
</tbody>
</table>

If Yes, Purpose of Amendment (AMD):

1) Increase PAD total estimated cost from $50,179,348 to $50,279,348; 2) Increase the ceiling of the Community Level Access to Social Services (CLASS) by $1,481,625 from $1,346,030 to $2,827,655; and 3) Expand the scope of the activities to provide the needed TA for the child welfare reform under the CLASS.

**DCN(s) of All Related EA/IEE/RCE/ER(s):** 2014-ARM-001; 2014-ARM-008

**Implementation Start/End:**

| LOP: FY2014-October 25, 2019 |
| AMD Amount: $100,000 |
| LOP Amount: $50,279,348 |

**Contract/Award Number (if known):**

**Recommended Environmental Determination:**

| Categorical Exclusion: | | Positive Determination: | |
| Negative Determination: | x | Deferral: | |

**Additional Elements:**

| Conditions: | x | Local Procurement: | x |
| Government to Government: | | Donor Co-Funded: | |
| Sustainability Analysis (included): | x | Climate Change Vulnerability Analysis (included): | x |

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**1. Background and Project Description**

1.1. Purpose and Scope of IEE:

The purpose of this IEE Amendment is to analyze potential environmental impacts and to recommend environmental determination for the ‘More Participatory, Effective and Accountable Governance’ Project (hereinafter referred to as “Project”) approved on October 25, 2013 taking into consideration the following changes to the Project:

1) Increase its total estimated cost from $50,179,348 to $50,279,348; 2) Increase the ceiling of the Community Level Access to Social Services (CLASS) by $1,481,625 from $1,346,030 to $2,827,655; and 3) Expand the scope of the activities to provide the needed technical assistance (TA) for the child welfare reform under the CLASS.
1.2. Project Overview:

Social policy is one of the key reform areas that USAID/Armenia will assist the GOAM and civil society to implement and to improve Armenia’s social protection system and social services, particularly for the most vulnerable populations. The Mission will also assist relevant government institutions building their capacity to administer integrated social services, and community-based services for vulnerable populations, including children. These important social reforms will go a long way toward increasing civic trust in public services as well as improving government effectiveness and sustainable delivery of services.

1.3. Project Description:

The support to the GOAM’s national child welfare reform is within the framework of the approved PAD level IEE, under the Project “More Participatory, Effective and Accountable Governance”.

USAID has a suite of projects intended to support the child welfare reform – direct financial assistance activities (G2G) with the Ministry of Labor and Social Affairs, Ministry of Education and Science, and projects with UNICEF and World Vision (WV). Recently, USAID reviewed its approach to supporting the child welfare reform and decided to make some adjustments to the technical assistance (TA) component. Specifically, USAID has decided to end its project with UNICEF “Toward Social Inclusion of Vulnerable Children in Armenia” early, by November 30, 2017. USAID was concerned that UNICEF has not been the strong voice needed to push forward the reforms. However, the performance of UNICEF’s sub-awardees - World Vision, FAR Children Support Center, and Bridge of Hope NGO - has been satisfactory. Save the Children completed the work that it was responsible for – the establishment of diversified foster care services in the country. This included, but was not limited to, the revision of national alternative childcare framework and development of legal recommendations for the expansion and diversification of foster care in Armenia.

In 2017, USAID/Armenia received $100,000 from USAID/Washington’s Displaced Children and Orphans Fund (DCOF) for the development and implementation of the communication strategy for the child welfare reform.

Given the above circumstances, USAID considers that the scaling up of the WV’s current CLASS activity will help provide needed TA to the GOAM’s child welfare reform and include the child protection components of the UNICEF award, implemented by World Vision, FAR Children’s Support Center, and Bridge of Hope.

With the increased funding, the WV CLASS Activity will be modified to meet these objectives. With reference to the Standard Mission Order on Project Design (USAID/Armenia MO1004), PAD is being amended to reflect the above-described changes. WV will submit the request for modification for USAID’s consideration.

2. Baseline Environmental Information

2.1. Locations Affected and Environmental Context:

The Republic of Armenia is a relatively small, mountainous, land-locked country with a total area of 29,740 km², located in the south-central Caucasus region of Eurasia. The country has a challenging development context because of its geopolitical constraints and unresolved conflict, energy dependency, limited economic and political competition, and population dynamics in the country.

Currently, the country faces a trade embargo and closed borders with Azerbaijan and Turkey. It is striving to develop a market based economy and become competitive worldwide. While growth has resumed to a certain degree since the global financial crisis, significant structural challenges remain. Growth typically benefits specific segments of society primarily located in urban areas in and around Yerevan. The poverty rate is 35.8% and unemployment is 20%, with youth unemployment at over double this figure.
GOAM recognized de-institutionalization as a priority in 2011 and has committed to establishing community-based alternative services and family type care. The GOAM has requested USAID to provide assistance in transforming the existing “social orphan” system, which encourages the poor and parents of disabled children to send their children to institutions where they are housed away from their natural families, often permanently.

2.2. Description of Applicable Environmental and Natural Resource Legal Requirements Policies, Laws, and Regulations:

Armenia has a comprehensive legal framework on environment-related issues through domestic legislation and international agreements that the country is party to. Armenia is signatory to a number of Environmental Conventions, including Convention on Biological Diversity and Cartagena Protocol on Biosafety and supply of genetic materials, Convention concerning the protection of World Cultural and natural Heritage, UN Framework Convention on Climate Change, etc. The activity may be relevant to the stipulations of the Law in Populations Environmental Education and Upbringing, as it refers to standards for teaching environment.

Armenia is signatory to the UN Convention on the Rights of the Child and other international treaties. The Convention on the Rights of the Child lays out strong child rights protections relating to the environment, and contains two explicit references to the environment: First, the Convention links the child’s right to the highest attainable standard of health, including the right to nutritious food and safe drinking water, to issues of environmental pollution (art. 24). Second, it defines the child’s right to information on environmental health issues and defines environmental education as one of the goals of education (art. 29). But the Convention’s relevance is much broader; it provides a range of additional relevant protections including on child labor, child marriage, and business-related abuses.

2.3. Country/Ministry/Municipality Environmental Capacity Analysis:

Within the GOAM, targeted ministries for the child care reform project include the Ministry of Social Affairs and Labor and Ministry of Education and Science as well as local municipalities. Due to lack of capacity and staffing constraints at the national and community level, in many cases decisions are not well-informed and fail to take into account civil society concerns and recommendations.

Larger communities maintain the in-house capacity to oversee compliance with environmental regulations during the implementation of projects involving infrastructure, as well as waste collection and administration and other type of services connected with environment. Typically, special staff is assigned to review the process and provide analytical status reports. If violations occur, the municipality should then take corrective action. Due to small size and limited staff capacity, smaller communities/villages assign this role to the mayor who has to make sure that community services and projects are carried out in accordance with environmental regulations. Municipalities with larger budgets occasionally outsource environmental analysis to engineering companies, which, along with construction services, maintain experts specializing in environmental regulations.

2.4. Sustainability Analysis:

Sustainability of proposed interventions, i.e. the ability of created human and institutional capacity and skills, formed partnerships and developed tools and mechanisms, etc. which continue to develop beyond the dates and scope of the proposed activity, is integral to the success of the Activity. Per Amendment #4 of the Assistance Agreement, the GOAM assumed a number of commitments with regard to implementation of the Child Welfare Reform. To ensure financial sustainability of the developed alternative community-based services for children and their families, the GOAM committed to include those costs into 2017-2019 Medium-Term Expenditure Framework and other financial planning tools and takes full responsibility for the continued implementation and maintenance of these services.
2.5. Climate Change Vulnerability Analysis:

The Climate change vulnerability analysis is conducted and attached to this Amendment to IEE. See Annex 1 for the climate risk management summary table for more information.

<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
<th>Potential Climate Risk</th>
<th>Climate Risk Rating</th>
<th>Opportunities for Climate Resiliency</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1. Legal and regulatory framework refinement for implementation of child welfare reform</td>
<td>No adverse impact anticipated</td>
<td>n/a</td>
<td>Low</td>
<td>Capacity development of the system to anticipate, prepare for, respond to, and recover from significant stressors with minimum damage to social well-being, the economy, and the environment.</td>
</tr>
<tr>
<td>2.2. Building the GOAM’s institutional and human resource capacity</td>
<td>No adverse impact anticipated</td>
<td>n/a</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>2.3 Establishment of family-based care and community-based alternative services</td>
<td>No adverse impact anticipated</td>
<td>n/a</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>2.4. Small-scale renovation of community-based service centers</td>
<td>Potential impact to land, water, air.</td>
<td>n/a</td>
<td>Low</td>
<td></td>
</tr>
<tr>
<td>2.5 Development and implementation of the communication strategy for the child welfare reform</td>
<td>No adverse impact anticipated</td>
<td>n/a</td>
<td>Low</td>
<td></td>
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</tbody>
</table>

3. Analysis of Potential Environmental Impact

Pursuant to 22 CFR 216.3(a)(2)(iii), the originator of the proposed project has to review the potential environmental impacts of the activities. The PAD-level IEE has considered the potential environmental impacts and recommended Mitigation Measures and Threshold Determination for the overall activities under the Project “Support to the GOAM’s national child welfare reform”. This amendment reflects the following changes to the Project: 1) Increase its total estimated cost from $50,179,348 to $50,279,348; 2) Increase the ceiling of the Community Level Access to Social Services (CLASS) by $1,481,625 from $1,346,030 to $2,827,655; and 3) Expand the scope of the activities to provide the needed TA for the child welfare reform under the CLASS.

The terms and conditions of the original IEE DCN: 2014-ARM-001 remain valid.
### 4. Recommended Environmental Actions

#### 4.1. Recommended Mitigation

<table>
<thead>
<tr>
<th>Defined/Illustrative Activities</th>
<th>Potential Impacts</th>
<th>Mitigation Measures</th>
<th>Recommended Threshold Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Legal and regulatory framework refinement for implementation of child welfare reform</td>
<td>No environmental impact is envisaged</td>
<td>n/a</td>
<td>Categorical Exclusion</td>
</tr>
<tr>
<td>2.2 Building the GOAM’s institutional and human resource capacity</td>
<td>No environmental impact is envisaged</td>
<td>n/a</td>
<td>Categorical Exclusion</td>
</tr>
<tr>
<td>2.3 Establishment of family-based care and community-based alternative services</td>
<td>No environmental impact is envisaged</td>
<td>n/a</td>
<td>Categorical Exclusion</td>
</tr>
<tr>
<td>2.4 Small-scale renovation of community-based service centers</td>
<td>The small-scale renovation of physical infrastructure component will need to incorporate appropriate environmental, health and safety measures, waste disposal and source material selection (based on best available and should consider energy efficiency performance as a critical factor). No lead containing paints are allowed for use. Potential impact to land, water, air.</td>
<td>Prior to initiating activities that have the potential to result in significant adverse environmental, health, and safety impact, the IP shall prepare an ERC/EMMP(s) in the format provided in the Annex 2 of this IEE. The COR/AOR, MEO, and BEO shall approve the ERC/EMMP(s) prior to implementation. For each site-specific activity, the ERC/EMMP shall be attached to the signed Certification of No Adverse or Significant Effects on the Environment (See ERC/EMMP Annex 1). This should be signed by the IP, COR/AOR, MEO, and BEO. After the IP has finalized its activities at a specific site, the IP shall sign a Record of Compliance with the ERC/EMMP (see ERC/EMMP Annex 2) certifying that the organization met all applicable ERC/EMMP conditions and submit it to the COR/AOR. The COR/AOR shall keep the original for the project files and provide a copy to the MEO and BEO.</td>
<td>Negative Determination</td>
</tr>
<tr>
<td>2.5 Development and implementation of the communication strategy for the child welfare reform</td>
<td>No environmental impact is envisaged</td>
<td>n/a</td>
<td>Categorical Exclusion</td>
</tr>
</tbody>
</table>
4.2. Recommended Environmental Determination:

**Categorical Exclusions:**
A categorical exclusion is recommended for the following identified activities under 22 CFR 216.2(c)(2):
The illustrative activities 2.1, 2.2, 2.3, and 2.5 are recommended for a categorical exclusion pursuant to §216.2c(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.)

**Negative Determination with Conditions:**
Under §216.3(a)(2)(iii), a negative determination with conditions is recommended for the activity 2.4. Specific terms and conditions are presented below.

4.3. Terms and Conditions: Prior to initiating activities that have the potential to result in significant adverse environmental, health, and safety impact, the IP shall prepare an ERC/EMMP(s) in the format provided in the Annex 2 of this IEE. The COR/AOR, MEO, and BEO shall approve the ERC/EMMP(s) prior to implementation. For each site-specific activity, the ERC/EMMP shall be attached to the signed *Certification of No Adverse or Significant Effects on the Environment* (See ERC/EMMP Annex 1). This should be signed by the IP, COR/AOR, MEO, and BEO. [The ERC/EMMP must be completed and approved prior to activities beginning. The IP is certifying that requirements have been properly assessed; environment, health, and safety impacts requiring further consideration have been comprehensively identified; and that adverse impacts will be effectively avoided or sufficiently minimized by proper implementation of the EMMP(s) in Section H.] After the IP has finalized its activities at a specific site, the IP shall sign a *Record of Compliance* with the ERC/EMMP (see ERC/EMMP Annex 2) certifying that the organization met all applicable ERC/EMMP conditions and submit it to the COR/AOR. The COR/AOR shall keep the original for the project files and provide a copy to the MEO and BEO. [The Record of Compliance certifies that all the mitigation measures that the IP confirmed would occur during project implementation did indeed occur. This annex is completed at the end of the project.]

4.3.1. ERC/EMMPs shall be captured in annual work plans, and therefore budgeted for and reviewed for adequacy at least annually.

4.3.2. Changes in activities and their associated ERC/EMMPs shall necessitate amending the IEE or issuing a Memo to the File (depending on extent and potential impact of the changes).

4.4. USAID Monitoring and Reporting

4.4.1. The AOR/COR, with the support of the MEO, is responsible for monitoring compliance of activities by means of desktop reviews and site visits.

4.4.2. If at any time the project is found to be out of compliance with the IEE, the AOR/COR or MEO shall immediately notify the BEO.

4.4.3. A summary report of Mission’s compliance relative to this IEE shall be sent to the BEO on an annual basis, normally in connection with preparation of the Mission’s annual environmental compliance report required under ADS 203.3.8.5 and 204.3.3.

4.4.4. The BEO or his/her designated representative may conduct site visits or request additional information for compliance monitoring purposes to ensure compliance with this IEE, as necessary.

4.5. Implementing Partner (IP) Monitoring and reporting
4.5.1. If an individual activity is found to pose significant adverse environmental effects that have not been identified and addressed in the attached EMMP(s), or EMMPs that were subsequently approved for the project, new EMMPs shall be developed to include environmental safeguards for such effects.

4.5.2. IPs shall report on environmental compliance requirements as part of their routine project

5. **Mandatory Inclusion of Requirements in Solicitations, Awards, Budgets and Workplans**

5.1. Appropriate environmental compliance language, including limitations defined in Section 6, shall be incorporated into solicitations and awards for this activity and projects budgets shall provide for adequate funding and human resources to comply with requirements of this IEE.

5.2. Solicitations shall include Statements of Work with task(s) for meeting environmental compliance requirements and appropriate evaluation criteria.

5.3. Environmental mitigation and monitoring requirements, when available, shall also be included in solicitations and awards.

5.4. The IP shall incorporate conditions set forth in this IEE into their annual work plans.

5.5. The IP shall ensure annual work plans do not prescribe activities that are defined as limitations, as defined in Section 6.

5.6. The USAID Mission will include an indicator for environmental compliance as part of the project’s performance monitoring plan. [If an IEE has a threshold determination of negative determination with conditions, then a possible indicator is if the IP did the ERC/EMMP.]

6. **Limitations of the IEE:** This IEE does not cover activities (and therefore should changes in scope implicate any of the issues/activities listed below, a BEO-approved amendment shall be required), that: [if included under Sections 3 and 4 above, then delete from below]

6.1. Normally have a significant effect on the environment under §216.2(d)(1) [See http://www.usaid.gov/our_work/environment/compliance/regulations.html]

6.2. Support project preparation, project feasibility studies, engineering design for activities listed in §216.2(d)(1);

6.3. Affect endangered species;

6.4. Result in wetland or biodiversity degradation or loss;

6.5. Support extractive industries (e.g. mining and quarrying);

6.6. Promote timber harvesting;

6.7. Provide support for regulatory permitting;

6.8. Result in privatization of industrial or infrastructure facilities;

6.9. Lead to new construction of buildings or other structures;

6.10. Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, cleanup of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials and /or pesticides (cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act); and

6.11. Procure or use genetically modified organisms.

7. **Revisions**

7.1. Under §216.3(a)(9), if new information becomes available that indicates that activities covered by the IEE might be considered major and their effect significant, or if additional activities are proposed that might be considered major and their adverse effect significant, this environmental threshold decision will be reviewed and, if necessary, revised by the Mission with concurrence by the BEO. It is the responsibility of the USAID COR/AOR to keep the MEO and BEO informed of any new information or changes in the activity that might require revision of this IEE.
8. Recommended Environmental Threshold Decision Clearances:

   Approval:
   
   ____________________________  ____________________________
   Deborah Grieser, Mission Director  12/4/2017
   
   Clearance:
   
   ____________________________  ____________________________
   Marina Vadanyan, Mission Environmental Officer  11/29/2017
   
   Clearance:
   
   ____________________________  ____________________________
   Manukyan, COR/AOR  11/27/2017
   
   Concurrence:
   
   ____________________________  ____________________________
   Mark Kamiya  12/6/2017
   E&E Bureau Environmental Officer

Distribution:
IEE File
MEO (to also provide a copy to AOR/COR)
Annex 1: Climate Change Vulnerability Analysis

<table>
<thead>
<tr>
<th>1.1: Defined or Anticipated DOs, IRs, or sectors*</th>
<th>1.2: Timeframe*</th>
<th>1.3: Geography</th>
<th>2: Climate Risks*</th>
<th>3: Adaptive Capacity*</th>
<th>4: Climate Risk Rating of DO or IR*</th>
<th>5: Opportunities</th>
<th>6.1: Climate Risk Management Options</th>
<th>6.2: How Climate Risks Are Addressed in the Strategy*</th>
<th>7: Next Steps for Project and/or Activity Design*</th>
<th>8: Accepted Climate Risks*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Legal and regulatory framework refinement for implementation of child welfare reform</td>
<td>Within two years of the project.</td>
<td>Country wide</td>
<td>N/A</td>
<td>N/A</td>
<td>Low</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2. Building the GOAM’s institutional and human resource capacity</td>
<td>Within two years of the project.</td>
<td>Country wide</td>
<td>N/A</td>
<td>N/A</td>
<td>Low</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>3. Establishment of family-based care and community-based alternative services</td>
<td>Within two years of the project.</td>
<td>Country wide</td>
<td>N/A</td>
<td>N/A</td>
<td>Low</td>
<td>Establish a framework to address the siting of the facilities to avoid areas that flood or have other existing hazards such as lead paint or asbestos (floor tile, glues and</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Armenia / WV CLASS Amendment
4. Small-scale renovation of community-based service centers

<table>
<thead>
<tr>
<th>Within two years of the project.</th>
<th>N/A</th>
<th>N/A</th>
<th>Low</th>
</tr>
</thead>
</table>

Schedule visits to the potential sites and identify potential environmental hazards such as lead paint before any sites are renovated. If any hazards are defined they should be remediated by qualified workers and the waste properly packaged and disposed (or avoided if the costs are too high or if qualified workers/companies are not available). Also, plan the works in a way to avoid severe weather events.
| 5. Development and implementation of the communication strategy for the child welfare reform | Within two years of the project | N/A | N/A | Low | N/A | N/A | N/A | N/A | N/A |
ENVIRONMENTAL REVIEW CHECKLIST (ERC) for Identifying Potential Environmental Impacts of Project Activities and Processes/
ENVIRONMENTAL MITIGATION AND MONITORING PLAN (EMMP)
ERC/EMMP

for [Activity Name]

Implemented under: [Project Name]

DCN: [of Parent IEE]

Prepared by: [Implementer]
ENVIRONMENTAL REVIEW CHECKLIST FOR IDENTIFYING POTENTIAL ENVIRONMENTAL IMPACTS OF PROJECT ACTIVITIES AND PROCESSES

The Environmental Review Checklist for Identifying Potential Environmental Impacts of Project Activities and Processes (ERC) and Environmental Mitigation and Monitoring Plan (EMMP) is intended for use by implementing partners to: assess activity-specific baseline conditions, including applicable environmental requirements; identify potential adverse environmental effects associated with planned activity(s) and processes; and develop EMMPs that can effectively avoid or adequately minimize the identified effects. This ERC/EMMP may be substituted for other ERC/EMMP versions that may have been attached to previous initial environmental examinations (IEE). If implementing partners are in doubt about whether a planned activity requires preparation of an ERC, they should contact their Contracting Officer’s Representative (COR)/Agreement Officer’s Representative (AOR) for clarification. In turn, the COR/AOR should contact their Mission Environmental Officer (MEO) if they have any questions. In special circumstances and with approval of the BEO it is possible to have one very comprehensive ERC/EMMP for multiple projects if they are similar in scope. (When preparing the ERC/EMMP, please indicate “not applicable” for items that have no bearing on the activity. The ERC/EMMP should be completed by an environmental specialist. The ERC/EMMP must be completed and approved prior to the activity beginning.)

A. Activity and Site Information

<table>
<thead>
<tr>
<th>Project Name: (as stated in the triggering IEE)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mission/Country:</td>
</tr>
<tr>
<td>DCN of Most Recent Triggering IEE or Amendment:</td>
</tr>
<tr>
<td>Activity/Site Name:</td>
</tr>
<tr>
<td>Type of Activity:</td>
</tr>
<tr>
<td>Name of Reviewer and Summary of Professional Qualifications:</td>
</tr>
<tr>
<td>Date of Review:</td>
</tr>
</tbody>
</table>

B. Activity Description

1. Activity purpose and need
2. Amount of activity
3. Location of activity
4. Beneficiaries, e.g., size of community, number of school children, etc.
5. Number of employees and annual revenue, if this is a business
6. Implementation timeframe and schedule
7. Detailed description of activity, items that will be purchased (This section should fully describe what funds are being used for.)
8. Detailed description of site, e.g., size of the facility or hectares of land; steps that will be taken to accomplish the activity;
9. Existing or planned certifications, e.g., ISO 14001 EMS, ISO 9000, HCCP, SA 8000, Global Gap, Environmental Product Declarations, Eco Flower, EcoLogo, Cradle to Cradle, UL Environment, GREENGUARD, Fair Trade, Green Seal, LEED, or various Forest Certifications
10. Site map, e.g., provide an image from Google Earth of the location
11. Photos of site, items to be purchased, engineering construction plans (when available)

C. Activity-Specific Baseline Environmental Conditions
1. Population characteristics
2. Geography
3. Natural resources, e.g., nearby forest/protected areas, ground and surface water resources
4. Current land use and owner of land
5. Proximity to public facilities, e.g., schools, hospitals, etc.
6. Other relevant description of current environmental conditions in proximity to the activity

D. Legal, Regulatory, and Permitting Requirements
1. National environmental impact assessment requirements for this activity
2. Applicable National or local permits for this activity, responsible party, and schedule for obtaining them:

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Responsible party</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zoning</td>
<td></td>
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<tr>
<td>Building/Construction</td>
<td></td>
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<tr>
<td>Source Material Extraction</td>
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<td>Waste Disposal</td>
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<tr>
<td>Wastewater</td>
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<tr>
<td>Storm Water Management</td>
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<td>Air Quality</td>
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<tr>
<td>Water Use</td>
<td></td>
<td></td>
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<tr>
<td>Historical or Cultural Preservation</td>
<td></td>
<td></td>
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<tr>
<td>Wetlands or Water bodies</td>
<td></td>
<td></td>
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<tr>
<td>Threatened or Endangered Species</td>
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<tr>
<td>Other</td>
<td></td>
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</tbody>
</table>

3. Additional National, European Union, or other international environmental laws, conventions, standards with which the activity might be required to comply
   a. Air emission standards
   b. Water discharge standards
   c. Solid waste disposal or storage regulations
   d. Hazardous waste storage and disposal
   e. Historical or cultural preservation
   f. Other

E. Engineering Safety and Integrity (for Sections E. and F., provide a discussion for any of the listed issues that are yes answers and likely to have a bearing on this activity)
1. Will the activity be required to adhere to formal engineering designs/plans? Have these been or will they be developed by a qualified engineer? If yes, attach the plans to the ERC/EMMP.

2. Do designs/plans effectively and comprehensively address:
   a. Management of storm water runoff and its effects?
   b. Reuse, recycling, and disposal of construction debris and by-products?
   c. Energy efficiency and/or preference for renewable energy sources?
   d. Pollution prevention and cleaner production measures?
   e. Maximum reliance on green building or green land-use approaches?
   f. Emergency response planning?
   g. Mitigation or avoidance of occupational safety and health hazards?
   h. Environmental management of mobilization and de-mobilization?
   i. Capacity of the host country recipient organization to sustain the environmental management aspects of the activity after closure and handover?

3. Are there known geological hazards, e.g., faults, landslides, or unstable soil structure, which could affect the activity? If so, how will the project ensure structural integrity?

4. Will the site require grading, trenching, or excavation? Will the activity generate borrow pits? If so, how will these be managed during implementation and closure?

5. Will the activity cause interference with the current drainage systems or conditions? Will it increase the risk of flooding?

6. Will the activity interfere with above- or below-ground utility transmission lines, e.g., communications, water, sewer, or natural gas?

7. Will the activity potentially interfere with vehicle or pedestrian traffic?

8. Does the activity increase the risk of fire, explosion, or hazardous chemical releases?

9. Does the activity require disposal or retrofitting of polychlorinated biphenyl-containing equipment, e.g., transformers or florescent light ballasts?

F. Environment, Health, and Safety Consequences

1. Potential impacts to public health and well-being
   a. Will the activity require temporary or permanent property land taking?
   b. Will activities require temporary or permanent human resettlement?
   c. Will area residents and/or workers be exposed to pesticides, fertilizer, or other toxic substances, e.g., as a result of farming or manufacturing? If yes, then there should be an approved, current PERSUAP on file and discuss how it will be used in this situation. If so, how will the project:
      i. Ensure that these chemicals do not contaminate ground or surface water?
      ii. Ensure that workers use protective clothing and equipment to prevent exposure?
      iii. Control releases of these substances to air, water, and land?
      iv. Restrict access to the site to reduce the potential for human exposure?
d. Will the activity generate pesticide, chemical, or industrial wastes? Could these wastes potentially contaminate soil, groundwater or surface water?
e. Will chemical containers be stored at the site?
f. Does the activity remove asbestos-containing materials or use of building materials that may contain asbestos, formaldehyde, or other toxic materials? Can the project certify that building materials are non-toxic? If so, how will these wastes be disposed of?
g. Will the activity generate other solid or hazardous wastes such as construction debris, dry or wet cell batteries, florescent tubes, aerosol cans, paint, solvents, etc.? If so, how will this waste be disposed of?
h. Will the activity generate nontoxic, nonhazardous solid wastes (subsequently requiring land resources for disposal)?
i. Will the activity pose the need to handle and dispose of medical wastes? If so, describe measures of ensuring occupational and public health and safety, both onsite and offsite.
j. Does the activity provide a new source of drinking water for a community? If so, how will the project monitor water quality in accordance with health standards?
k. Will the activity potentially disturb soil contaminated with toxic or hazardous materials?
l. Will activities, e.g., construction, refurbishment, demolition, or blasting, result in increased noise or light pollution, which could adversely affect the natural or human environment?

2. Atmospheric and air quality impacts
   a. Will the activity result in increased emission of air pollutants from a vent or as fugitive releases, e.g., soot, sulfur dioxide, oxides of nitrogen, volatile organic compounds, methane.
   b. Will the activity involve burning of wood or biomass?
   c. Will the activity install, operate, maintain, or decommission systems containing ozone depleting substances, e.g., freon or other refrigerants?
   d. Will the activity generate an increase in carbon emissions?
   e. Will the activity increase odor and/or noise?

3. Water quality changes and impacts
   a. How far is the site located from the nearest river, stream, or lake? (Non-yes/no question)
   b. Will the activity disturb wetland, lacustrine, or riparian areas?
   c. What is the depth to groundwater at the site? (Non-yes/no question)
   d. Will the activity result in increased ground or surface water extraction? If so, what are the volumes? Permit requirements? (Non-yes/no question)
   e. Will the activity discharge domestic or industrial sewage to surface, ground water, or publicly-owned treatment facility?
   f. Does the activity result in increased volumes of storm water run-off and/or is there potential for discharges of potentially contaminated (including suspended solids) storm water?
g. Will the activity result in the runoff of pesticides, fertilizers, or toxic chemicals into surface water or groundwater?

h. Will the activity result in discharge of livestock wastes such as manure or blood into surface water?

i. Does the site require excavation, placing of fill, or substrate removal (e.g., gravel) from a river, stream or lake?

4. **Land use changes and impacts**
   a. Will the activity convert fallow land to agricultural land?
   b. Will the activity convert forest land to agricultural land?
   c. Will the activity convert agricultural land to commercial, industrial, or residential uses?
   d. Will the activity require onsite storage of liquid fuels or hazardous materials in bulk quantities?
   e. Will the activity result in natural resource extraction, e.g., granite, limestone, coal, lignite, oil, or gas?
   f. Will the activity alter the viewshed of area residents or others?

5. **Impacts to forestry, biodiversity, protected areas and endangered species**
   a. Is the site located adjacent to a protected area, national park, nature preserve, or wildlife refuge?
   b. Is the site located in or near threatened or endangered (T&E) species habitat? Is there a plan for identifying T&E species during activity implementation? If T&E species are identified during implementation, is there a formal process for halting work, avoiding impacts, and notifying authorities?
   c. Is the site located in a migratory bird flight or other animal migratory pathway?
   d. Will the activity involve harvesting of non-timber forest products, e.g., mushrooms, medicinal and aromatic plants (MAPs), herbs, or woody debris?
   e. Will the activity involve tree removal or logging? If so, please describe.

6. **Historic or cultural resources**
   a. Are there cultural or historic sites located at or near the site? If so, what is the distance from these? What is the plan for avoiding disturbance or notifying authorities?
   b. Are there unique ethnic or traditional cultures or values present in the site? If so, what is the applicable preservation plan?

G. **Further Analysis of Recommended Actions** *(Most activities will have a threshold determinations of negative determination with conditions.)*

☐ 1. **Categorical Exclusion:** The activity is not likely to have an effect on the natural or physical environment. No further environmental review is required.* (This is rarely used in the ERC/EMMP.)

☐ 2. **Negative Determination with Conditions:** The activity does not have potentially significant adverse environmental, health, or safety effects, but may contribute to minor impacts that can be eliminated or adequately minimized by appropriate mitigation measures. ERC/EMMPs shall be developed, approved by the Mission Environmental Officer (MEO) and the BEO **prior to beginning the activity**, incorporated into workplans, and then implemented.

For activities related to the procurement, use, or training related to pesticides, a PERSUAP
will be prepared for BEO approval, PERSUAPS are considered amendments to the IEE and usually Negative Determination with Conditions. See Sections H and I below.*

☐ 3. Positive Determination: The activity has potentially significant adverse environmental effects and requires further analysis of alternatives, solicitation of stakeholder input, and incorporation of environmental considerations into activity design. A Scoping Statement (SS) must be prepared and be submitted to the BEO for approval. Following BEO approval of the SS an Environmental Assessment (EA) will be conducted. The activity may not be implemented until the BEO clears the final EA. If the Parent IEE does not have Positive Determination as one of the threshold determinations, the IEE needs to be amended.

☐ 4. Activity Cancellation: The activity poses significant and unmitigable adverse environmental effects. Adequate ERC/EMMPs cannot be developed to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

**Note regarding applicability related to Pesticides (216.2(e): The exemptions of §216.2(b)(1) and the categorical exclusions of §216.2(c)(2) such as technical assistance, education, and training are not applicable to assistance for the procurement or use of pesticides.**

### H. EMMPs

(Using the format provided below list the processes that comprise the activity, then for each, identify impacts requiring further consideration, and for each impact describe the mitigation and monitoring measures that will be implemented to avoid or adequately minimize the impacts. All environment, health, and safety impacts requiring further consideration, which were identified in Section F., should be addressed)

1. Activity-specific environmental mitigation plan (Upon request, the MEO may be able to provide your project with example EMMPs that are specific to your activity.)

<table>
<thead>
<tr>
<th>Processes</th>
<th>Identified Environmental Impacts</th>
<th>Do the Impacts Require Further Consideration?</th>
<th>Mitigation Measures</th>
<th>Monitoring Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>List all the processes that comprise the activity(s) (e.g. asbestos roof removal, installation of toilets, remove and replace flooring) A line should</td>
<td>A single process may have several potential impacts—provide a separate line for each.</td>
<td>For each impact, indicate Yes or No; if No, provide justification, e.g.: (1) There are no applicable legal requirements including permits or reporting and (2) There is no relevant community concern and (3) Pollution prevention is not feasible or practical and</td>
<td>For each impact requiring further consideration, describe the mitigation measures that will avoid or adequately minimize the impact. (If mitigation measures are well-specified in the IEE, quote directly from IEE.)</td>
<td>Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)</td>
</tr>
<tr>
<td>Processes</td>
<td>Identified Environmental Impacts</td>
<td>Do the Impacts Require Further Consideration?</td>
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</tr>
<tr>
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<tr>
<td>be included for each process.</td>
<td></td>
<td>(4) Does not pose a risk because of low severity, frequency, or duration</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. Activity-specific monitoring plan

<table>
<thead>
<tr>
<th>Monitoring Indicators</th>
<th>Monitoring and Reporting Frequency</th>
<th>Responsible Parties</th>
<th>Records Generated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specify indicators to (1) determine if mitigation is in place and (2) successful (for example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)(Taken from column 5 of the environmental mitigation plan above.)</td>
<td>For example: “Monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID COR/AOR.”</td>
<td>Separate parties responsible for mitigation from those responsible for reporting, whenever appropriate,</td>
<td>If appropriate, describe types of records generated by the mitigation, monitoring, and reporting process.</td>
</tr>
</tbody>
</table>

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ERC/EMMP ANNEX 1
Certification of No Adverse or Significant Effects on the Environment

I, the undersigned, certify that activity-specific baseline conditions and applicable environmental requirements have been properly assessed; environment, health, and safety impacts requiring further consideration have been comprehensively identified; and that adverse impacts will be effectively avoided or sufficiently minimized by proper implementation of the EMMP(s) in Section H. If new impacts requiring further consideration are identified or new mitigation measures are needed, I will be responsible for notifying the USAID COR/AOR, as soon as practicable. Upon completion of activities, I will submit a Record of Compliance with Activity-Specific EMMPs using the format provided in ERC Annex 2.

Implementer Project Director/COP Name ___________________________ Date ___________________________

Approvals:

USAID COR/AOR Name ___________________________ Date ___________________________

Mission Environmental Officer Name ___________________________ Date ___________________________

Concurrence:

Mark Kamiya, Bureau Environmental Officer ___________________________ Date ___________________________

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ERC/EMMP ANNEX 2
RECORD OF COMPLIANCE WITH ACTIVITY-SPECIFIC ENVIRONMENTAL MITIGATION AND MONITORING PLANS (EMMPs)

The [name of the implementing organization] has finalized its activities at the [site name] to [describe activities and processes that were undertaken]. This memorandum is to certify that our organization has met all conditions of the EMMPs for this activity. A summary and photo evidence of the how mitigation and monitoring requirements were met is provided below.

1. Mobilization and Site Preparation
2. Activity Implementation Phase
3. Site Closure Phase
4. Activity Handover

Sincerely,

Implementer Project Director/COP Name

Date

Approved:

USAID/COR/AOR/Activity Manager Name

Date

Distribution:
- Project Files
- MEO
- Bureau Environmental Officer

Subject: Site or Activity Name/Primary Project
IEE DCN: 
To: COR/AOR/Activity Manager Name
Copy: Mission Environmental Officer Name
Date: 

Approved: