REQUEST FOR CATEGORICAL EXCLUSION (RCE) - Amendment 1

PROJECT/ACTIVITY DATA:

Activity Name: Syria Recovery Trust Fund (SRTF)
Country/region: Syria
Start Date: 11/26/2013  Expiration Date: 12/31/2025
Life of Project Amount ($) : $200 million  Date: 11/29/2018
IEE Prepared by: Christopher Bodde
Amendment: Yes
If “Yes,” Number & Date of Original IEE: ME 14-08 dated 10/25/2013

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion:  [ X ]  Negative Determination with Conditions:  [ ]
Positive Determination:  [ ]  Deferral:  [ ]

Purpose and Scope

The purpose of this document is to establish that all proposed projects/activities belong to classes of actions eligible for Categorical Exclusions as set out in Agency regulations (22 CFR 216.2(c)) and that there are no foreseeable significant direct or indirect impacts that would preclude them from receiving a Categorical Exclusion.

This amendment establishes an expiration date of December 31, 2025 (previously no expiration date was specified), and increases the Life of Project amount from $15 million to $200 million.

Upon approval of this document, the Categorical Exclusions are affirmed for the activity. This analysis also documents the results of the project/activity level Climate Risk Management process in accordance with USAID policy. This RCE is a critical element of a mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation.

The activities under review are recommended for categorical exclusion.

Background and Description of Activities

The SRTF is a multi-donor funding mechanism (12 donors and two host countries, Turkey and Jordan), receiving over $240 million in contributions (from all donors) since its inception in 2013. To date, the U.S. has contributed $60 million. The SRTF was originally established to finance medium-large sized stabilization projects in opposition-controlled areas in anticipation of a more rapid political transition. The protracted conflict resulted in a shift to more immediate essential services and early recovery. Our early participation enabled the United States to be one of the “original, permanent” donors, along with the founders (the United Arab Emirates and
Germany), the Syrian Opposition Coalition (SOC), and the trustee (KfW, German development bank). The original donors and the SOC, as represented by the Syrian Interim Government, have veto authority.

Per ADS 351.3.2.3b where a significant purpose of a grant to a Bilateral Donor (in this case, KfW) is accomplished upon disbursement of USAID funds, such funds may lose their federal character and specific application of USAID policies and procedures are therefore often limited.

The Framework Agreement which governs USG’s participation in the SRTF includes provisions that prohibit the finance of expenditures that are harmful to the environment:

- hydro chlorofluorocarbons and halons as well as other substances subject to the Montreal Protocol on Substances that Deplete the Ozone Layer and the facilities for their production or use;


- asbestos, as well as substances and products containing asbestos

USAID reviews and votes on all project proposals, reaching back as appropriate to USAID staff for assistance if attention to the environment on a particular project is needed.

**Recommended Threshold Decisions**

- **Justification for Categorical Exclusion Request**

The activities described justify Categorical Exclusions, pursuant to 22 CFR 216.2(c)(2), for which an Initial Environmental Examination, or an Environmental Assessment are not required because the actions do not have an effect on the natural or physical environment.

Specifically, at the time of contribution, these activities fall into the following class of action:

- Contributions to international, regional or national organizations by the United States which are not for the purpose of carrying out a specifically identifiable project or projects - 22 CFR 216.2(c)(2)(vi)

**Climate Risk Management**

As per the ADS 201mal, USAID should factor climate resilience into international development programs and investments. According to ADS 201mal, contributions to multi-donor trust funds managed by a foreign public entity are exempted from climate risk management requirements, therefore no climate risk screening was performed for this activity.
Revisions

If during implementation, award activities are considered outside of those described in this document, an amendment shall be submitted. Pursuant to 22 CFR 216.3(a)(9), if new activities are added and/or information becomes available which indicates that activities to be funded by the award might be “major” and the award’s effect “significant,” this determination will be reviewed and revised by the USAID Activity Manager (AM) or C/AOR, and submitted to the Regional Environmental Advisor (REA) and Bureau Environment Officer (BEO) for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the AM or C/AOR to keep the REA and the BEO informed of any new information or changes in the activity that might require revision of the IEE.

Limitations

To the extent that specific activities are subject to approval by USAID, 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:

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
2. Affect endangered species;
3. Result in wetland or biodiversity degradation or loss;
4. Support extractive industries (e.g. mining and quarrying);
5. Promote timber harvesting;
6. Provide support for regulatory permitting;
7. Result in privatization of industrial or infrastructure facilities;
8. 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
9. Procure or use genetically modified organisms.
APPROVAL OF REQUEST FOR CATEGORICAL EXCLUSION - Syria Recovery Trust Fund
Amendment 1

CLEARANCES:

Syria Desk: CBodde 12/07/2018
ME/MEA: GSchwartz 12/11/2018
ME/MEA: SBorodin 12/11/2018
START: JLink INFO
SSAP: DIsaak 12/11/2018
ME/SPO: DHeuschel 1/23/2019
ME/GC: MMansell 2/6/2019
ME/REA: SEbert 2/7/2019

APPROVAL:
Hallam Ferguson, Senior Deputy Assistant Administrator, Middle East Bureau

[Signature]
5/29/19
Date

CONCURRENCE:
William Gibson, Acting Middle East Bureau Environmental Officer

[Signature]
May 31, 2019
Date