INITIAL ENVIRONMENTAL EXAMINATION - IEE

New USAID Trailer Office

PROGRAM/ACTIVITY DATA

Country Code: 268-001
AO Name: USAID/Lebanon Mission
Country or Region: Lebanon
Activity: New USAID Trailer Office
Funding Begin: May 15, 2018 Funding End: December 31, 2019
LOP Amount: $3,000,000

IEE Prepared by: Rami Wehbeh, Project Management Specialist
Date: May 8, 2018

IFEE Amendment (Y/N): N

If “Yes,” Number and Date of Original IEE:

Environmental Media and/or Human Health Potentially Impacted (check all that apply):
air ✓, water ✓ land, biodiversity, human health ✓, other, none

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)
Categorical Exclusion: ☐
Deferral: ☐
Positive Determination: ☐
Negative Determination with Conditions: ☑
Exemption: ☐

BACKGROUND

USAID/Lebanon has historically been under-staffed due to the challenging political and security environment and the concomitant restrictions on office space and embassy compound housing for U.S. direct hires. This staff shortage has been exacerbated over the past decade due to significant program budget increases and growing complexity in the Mission’s programs. Currently, the Mission has less than half the staff of any regular Mission managing a program and budget of USAID/Lebanon’s size. The Mission is in the process of recruiting additional Foreign Service Nationals (FSN) staff and is in dire need for additional office space to accommodate these individuals. New USAID office space is therefore needed to house the increase in the number of FSNs required to effectively manage the Mission’s growing portfolio and safeguarding it against potential vulnerabilities.

USAID/Lebanon intends to procure specialty services to design, fabricate, ship, assemble, and furnish a 156m² “Forced Entry/Ballistic Resistant (FE/BR)” certified modular, unclassified office space at the U.S. Embassy in Beirut Lebanon. The new office space will
be erected on top of an identical existing FE/BR office. Program funds will be used for this activity.

The office design will be developed in coordination with USAID/Lebanon, USAID's Overseas Management Division (OMD), the Department of State (DOS) Bureau of Diplomatic Security (DS), and the DOS Bureau of Overseas Buildings Operations (OBO).

**SUMMARY OF FINDINGS**

This procurement will include the following three phases that will be implemented in sequence upon the authorization of USAID for each phase.

1. Deliverability and Assembly assessment
2. Design
3. Fabrication, Delivery, and Completion

Table 1 lists activities covered in this IEE as well as their recommended threshold decisions.

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<th>Table 1: Activities and recommended threshold decisions</th>
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**Recommended Actions:** Categorical Exclusion (approximately 20% of the funding) and Negative Determination with Conditions (approximately 80% of the funding)

**Recommended Environmental Determination:**

All activities under phase 1 & 2 are recommended for Categorical Exclusion pursuant to 22 CFR 216.2 (c) (2) (iii) and (v), as most of the actions under these phases involve engineering
designs, desk reviews, and data analysis. Therefore, they are excluded from further environmental review, an initial environmental examination or environmental assessment.

The delivery, transport, assembly, installation, and furnishing activities under phase 3 qualify for Negative Determination with Conditions as they might have limited impact on the environment. The risks are very limited and can be summarized as follows: 1) minor air pollution due to dust resulting from installation activities, 2) waste generated during installation, 3) traffic interruption during transport of units, and 4) safety hazards for workers and occupants of the existing and surrounding offices.

The USAID/Lebanon Mission will follow OBO and DS standards for construction and environmental compliance, as per the ‘OBO Green Guide 2’ (attachment 6) available on the following link: https://overseasbuildings.state.gov/sites/admin-overseasbuildings.state.gov/files/pdfs/green_guide_2.pdf

Environmental conditions in this IEE will be incorporated into the award performance criteria for all partners and implementers, including subcontractors and grantees.

Climate Risk Management (CRM):
Construction activities are generally deemed to have medium to high climate risk. In this case, the materials procured, construction procedures, selected location, and maintenance of the prefabricated office and its contents are strictly controlled by USG standards and regulations because the office will be constructed on USG/Embassy property. Therefore, the team accepts the climate risks; no further action will be taken to mitigate climate risks at this time.

Resource Allocation, Training and Reporting requirements:

Given the small scale of this procurement, the relatively short duration of the installation activities (around three months), and the strict USG requirements in procurement and installation on Embassy grounds, the supervisory staff provided by the service provider will be sufficient for compliance of this procurement with acceptable environmental mitigation and monitoring requirements. The COR will monitor and document this compliance in the award files.

Limitations of the IEE:
This procurement doesn’t cover activities involving:

1. Assistance, procurement or use of genetically modified organisms (GMOs) will require preparation of biosafety assessment review in accordance with ADS 201.3.12.2(b) in an amendment to the IEE approved by Asia BEO.
2. DCA or GDA programs.
3. Procurement or use of Asbestos Containing Materials (ACM) (i.e. piping, roofing, etc), Polychlorinated Biphenyl’s (PCB) or other toxic/hazardous materials prohibited by US EPA as provided at: http://www.epa.gov/asbestos and/or under international environmental agreements and conventions, e.g. Stockholm Convention on Persistent Organic Pollutants as provided at: http://chm.pops.int
4. Provision of equipment and training on the safe and sound use of agro-chemicals or pesticides, and the purchase of any agro-chemicals or pesticides unless there is an approved PERSUAP in place that is approved by the BEO/ME.
Revisions:

Pursuant to 22 CFR 216.3 (a) (9), if any new information becomes available which indicates that any of the proposed actions to be funded by this activity might be "major" and their results "significant", the threshold decision for those actions listed above will be reviewed and revised by the MEO, and an environmental assessment prepared as appropriate. If, for any reason, the implementer of this project departs from any of the terms and conditions stated in the IEE, the COR shall inform the MEO, and an approval will be obtained from the REA and BEO before proceeding with project implementation.
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS:
IEE – New USAID/Lebanon Trailer Office

CLEARANCE:

Local Development Office Director
USAID/Lebanon
Cleared by email
James Harmon
May 16, 2018

Mission Environmental Officer
USAID/Lebanon
Cleared by email
Sana Saliba
May 15, 2018

Regional Environmental Advisor
USAID Middle East Regional Platform (USAID/MERP)
Cleared by email
Suzanne Ebert
May 15, 2018

Program Officer
USAID/Lebanon
Cleared by email
Walter Doetsch
May 16, 2018

Resident Legal Officer
USAID Middle East Regional Platform (USAID/MERP)
Cleared by email
Marcelo Arellano
May 16, 2018

APPROVAL:

Mission Director
USAID/Lebanon
Anne Patterson
May 17, 2018

CONCURRENCE:

Bureau Environmental Officer
John Wilson
Date: May 17, 2018
ATTACHMENT:
   1- OBO green_guide_2

DISTRIBUTION:
Mission Environmental Officer
IEE File
OAA File
Hi Rami,

I clear on the attached version.

Official
UNCLASSIFIED

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From: Wehbeh, Rami A
Sent: Wednesday, May 09, 2018 4:16 PM
To: Saliba, Sana G
Subject: RE: Urgent: New USAID office

Hello,

Please find attached a revised IEE per below guidance.

Rami

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From: Saliba, Sana G
Sent: Wednesday, May 09, 2018 2:06 PM
To: Ebert, Suzanne K (USAID/MERP/Frankfurt)
Cc: Wehbeh, Raml A
Subject: RE: Urgent: New USAID office

Thank you Suzanne,

We are following up on the OBO guidance and will get back to you with the IEE. John should expect it by mid next week.

Sana.

From: Suzanne Eber [mailto:sebert@usaid.gov]
Sent: Wednesday, May 09, 2018 12:47 PM
To: Saliba, Sana G
Cc: Wehbeh, Raml A
Subject: Re: Urgent: New USAID office
Hi Jim.

Thank you. I previously discussed with Suzanne and clear.

Please note there is a typo on the table on p.2, second row, middle column, which should read: "Potential for a significant adverse effect of one or more activities."

Best regards,

Marcelo

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On Wed, May 16, 2018 at 2:00 PM, Harmon, Jim <HarmonJ1@state.gov> wrote:

Hi Marcelo,

Hope all is well. You are next on the clearance for this expedited action. MEO, REO, LDO, and PROG have cleared, with minor edits in track changes.

Best regards, Jim

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W
Hi alter,

Attached is the IEE for the trailer, for your clearance. I'm tracking this for Sana so please send it back to me and I'll pass it to Marcelo who is the next clearance.

Regards, Jim

From: Saliba, Sana G
Sent: Tuesday, May 15, 2018 4:56 PM
To: Harmon, Jim
Cc: Brakhya, Carol; Wehbeh, Rami A
Subject: New Office IEE

Hi Jim,

This is the IEE for the new office trailer cleared by myself and by the Regional Environment Advisor. Appreciate your review and clearance.

Thank you,
Sana.

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Greening Diplomacy Initiative
Leading by Example: Keeping Earth in Diplomacy

OSO supports the Department-wide Greening Diplomacy Initiative (GDI) to harmonize diplomacy with responsible development by aligning with three key objectives:

1. Reducing the Department's environmental footprint: OSO establishes planning, design, and construction standards that implement sustainable technologies in all of our overseas construction projects. OSO's standards result in energy, water, and greenhouse gas emissions savings as well as resource conservation through the specification of environmentally friendly materials.

2. Informing both internal and external audiences about our efforts: OSO provides educational programs and presentations about the green features of our embassies and consulates through press releases, training, on-site signage, and videos.

3. Tracking our greening progress: OSO's Utility Portal collects and analyzes utility data worldwide to document, track, measure progress, and benchmark achievements.

External Site: http://www.state.gov/m/odp/gdi
Internal Site: http://m.state.gov/sites/odp/GDI/Pages/Home.aspx

Green Guide for Embassy & Consulate Operations

The Guide provides both a world context for global challenges such as greenhouse gas emissions and climate change, as well as mission-specific tips for systems such as lighting, insulation, and fleet management, to generate immediate results.

"I encourage our missions to use this timely and useful guide to address energy and sustainability challenges at our facilities overseas; in response to federal mandates and in support of greater environmental stewardship. Regular adherence to the guidance provided here will allow Overseas Buildings Operations to participate in and further the Department of State's platform of eco-diplomacy."

- Patrick F. Kennedy
Under Secretary for Management
Department of State

Available online:
http://www.state.gov/documents/organization/155651.pdf

Front cover: Mission Geneva, Switzerland — 105KW building-integrated photovoltaic array
FOR OVER A DECADE, the Department of State's Bureau of Overseas Buildings Operations (OBO) has worked to significantly increase the performance of more than 280 embassies, consulates, and diplomatic facilities around the world. Through new construction, major renovation, and systems upgrades, OBO has greatly improved conditions for our Americans overseas.

Our diplomatic missions require safe, secure, functional, well-maintained, and sustainable platforms for operation. As a time of surging energy prices and increasingly limited access to freshwater and natural resources, conservation is of paramount importance to our facilities. To that end, OBO formed an Energy & Sustainable Design (ESD) Unit that is challenged with bringing our portfolio into compliance with recent federal mandates that have aggressive greening targets and requirements. In addition to producing a variety of technical studies, ESD has produced a Green Guide for Embassy and Consulate Operations, along with a sustainability survey database, and report. OBO has also completed the assessment of numerous missions and the implementation of energy- and water-conservation measures to reduce energy and water consumption and costs. Together, these initiatives provide the State Department with a strong framework for high-performance facilities and stronger American missions.

LEED®
OBO has completed 83 new embassies and consulates in the past 10 years using the US Green Building Council's Leadership in Energy and Environmental Design (LEED®) Green Building Rating System and has another 34 under design and construction. In 2008, OBO formalized LEED® certification as a core requirement for new embassy and consulate construction, and raised the required level of achievement to LEED® Silver in 2010. Currently, OBO has over 40 LEED® projects in the pipeline for certification. Executive Order 13423 (2007) requires federal agencies to document sustainable performance, according to Guiding Principles, for 15% of buildings over 66,000 ft² (6,000 m²) by 2015. Compliance can largely be achieved through LEED® certification.

U.S. EMBASSY SOFIA, BULGARIA was the Department of State's first LEED® certified building. Its design features contributing to the certification include brownfield remediation, public transportation access, four acres of wildlife habitat and area preservation, and a high-efficiency drip irrigation system. Additionally, building features include water-efficient plumbing fixtures; locally sourced materials; and lighting sensors, timers, and shades to harvest the daylight and reduce energy consumption.

WATER
An increasing proportion of the world's populations are increasingly impaired by water scarcity. OBO is committed to reducing water demands on public systems and resources, increasing water reuse on-site, and protecting water quality at our diplomatic and residential facilities abroad. Executive Order 13314 (2009) requires existing federal facilities to reduce building water use from 2007 levels by 20% and reduce water used for irrigation from 2010 levels by 20% by 2020. To support this challenge, OBO is establishing comprehensive water audits on sites with high water use or at sites experiencing water shortages, and is planning new projects to reuse wastewater and treated wastewater effluent for landscape irrigation and for use within building systems. The United Nations Environment Program estimates that the construction industry is responsible for 1/3 of global resource consumption, 12% of all freshwater use, and 40% of the total volume of solid waste. Executive Order 13314 requires diversion of 35% of non-hazardous solid waste generated by the construction, demolition, and operation of federal facilities by 2015. OBO's goal is to recycle a minimum of 75% of new embassy/consulate construction waste.

ENERGY
Building operations are responsible for 40% of the world's energy consumption and released 1/3 of global greenhouse gas (GHG) emissions. Facilities operating overseas are often subject to variable and inflated energy costs and many are dependent on volatile sources. GHG emissions are reduced and energy security is increased through lowering demand and increasing on-site renewable sources of energy. Section 431 of the Energy Independence and Security Act (EISA 2007) requires existing federal facilities to reduce building energy use from 2006 levels by 20% by 2015. The Department also has a carbon reduction goal of 20% by 2020. Toward that goal, OBO has identified over $300M of potential photovoltaic projects that would increase our energy security and pay for themselves within 10 years through energy savings.

U.S. EMBASSY KIGALI, RWANDA hosts one of OBO’s 11 photovoltaic installations. This grid-connected photovoltaic array is mounted on the roofs of the General Service Office and Warehouse. With a peak capacity of 21.6 kW, the array is expected to produce 318,000 kWh/yr. Through the display monitor installed in the building’s lobby, visitors and staff are educated on the system attributes: current weather conditions; total, annual, and daily production of power; and total greenhouse gas emissions offset by the generation of renewable energy. Simple payback for the system is estimated to be 9.5 years, based on current and escalated utility rates.

MATERIALS
The United Nations Environment Program estimates that the construction industry is responsible for 1/3 of global resource consumption, 12% of all freshwater use, and 40% of the total volume of solid waste. Executive Order 13314 requires diversion of 35% of non-hazardous solid waste generated by the construction, demolition, and operation of federal facilities by 2015. OBO's goal is to recycle a minimum of 75% of new embassy/consulate construction waste.

U.S. EMBASSY BRAZZAVILLE, REPUBLIC OF THE CONGO generated waste during new embassy construction that was used to build 30 houses. OBO's General Contractor, B.L. Herbert International, partnered with the U.S. Agency for International Development (USAID), the Fuller Center for Housing, and the International Partnership for Human Development (IPHD) to build these houses for the Makans II village. In total, 95% of the project's construction waste was successfully diverted from landfills.

U.S. EMBASSY NAIROBI, KENYA was the subject of one such audit that revealed opportunities to reuse 3.8M liters of treated wastewater per year for irrigation, reducing demand on the local aquifer. A constructed wetland clarifying treated wastewater discharge is already in place. Additionally, redesign of the planting and irrigation system would conserve 8.84M liters of water per year.