1.0 PURPOSE, BACKGROUND AND ACTIVITY DESCRIPTION

1.1. Purpose and Background

The purpose of this Amendment to the IEE No. OAPA-19-APR-AFG-0015 for the 20MW Floating Solar PV Plant is to:

1. Timely and duly submit the Scoping Statement (SS) with a draft EMMP for 20-megawatt (MW) Floating Solar Photovoltaic (PV) Plant for BEO/OAPA review and approval (attached).
2. In view of the SS Report finding of no potentially significant adverse environmental, health, safety and social impacts, BEO/OAPA is requested to withdraw earlier approved Positive Threshold Decision and approve a Negative Determination with Condition (NDC).

3. Stipulate that the draft EMMP shall be updated based on the final design, location, scope and associated infrastructure, and that the final EMMP shall be submitted to BEO/OAPA for review and approval prior to start of construction activities on the ground.

4. Stipulate that the EMMP shall be accompanied by all valid applicable permits, licenses and other regulatory documents mandated and issued by the National Environmental Protection Agency (NEPA) and other relevant authorities.

5. Stipulate that the implementing partner (proponent/owner) shall: a) comply with BEO/OAPA approved EMMP, b) have sufficient technical and financial resources to implement BEO/OAPA approved EMMP, and c) timely report to USAID on EMMP implementation and seek USAID guidance if any un-anticipated environmental and social impacts emerge during construction.

6. Change the start date from April 2019 to January 2020 and the end date from April 2020 to June 2021 in the original IEE.

7. There are no other changes except stated above. All conditions, limitations and the stipulations for revisions established in the original IEE as well as any required climate change adaptation actions remain in force throughout the life of project (LOP).

1.2. Activity Description

There are no changes in the scope of work. Please refer to the original IEE for detail description of activities.

2.0 RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

Below is the recommended actions for the activities described above, their impacts on the environment and recommended Threshold Determinations and Conditions.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Effects on natural or physical environment</th>
<th>Recommended Threshold Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction of a 20 MWac floating solar PV power plant on Naghlu Reservoir:</td>
<td>Potentially significant impacts possible</td>
<td>Negative Determination with Conditions: Conditions:</td>
</tr>
<tr>
<td>1. Siting of the floating power plant on the reservoir</td>
<td>Implementing Partner will make sure that all activities related to the 20MW solar power plant in Naghlu activities are designed and conducted in an environmentally sound manner and best practices.</td>
<td>Implementing Partner shall make sure that all conditions of the IEE Amendment No 1 and of the</td>
</tr>
<tr>
<td>2. Selection of the type of PV cells and floating panels and the</td>
<td>Implementing Partner will make sure that all activities related to the 20MW solar power plant in Naghlu activities are designed and conducted in an environmentally sound manner and best practices.</td>
<td>Implementing Partner shall make sure that all conditions of the IEE Amendment No 1 and of the</td>
</tr>
</tbody>
</table>
arrangement of the floating panels, e.g. one or multiple squares / rectangles,

3. Establishment of access roads

4. Demobilization (clean up) of the construction site

5. Operation of the floating solar plant

| EMMP are incorporated in the designs and shall ensure compliance during field activities.
| Implementing Partner shall submit updated EMMP to BEO/OAPA for review and approval with indicative budget, when final siting and design of floating solar and related facilities is completed.
| The updated EMMP shall outline IP's reporting responsibilities to USAID and GOA duty agencies (permits, licenses, etc.,) incl. NEPA.

Table 1. Threshold Determinations

3.0 ENVIRONMENTAL RECOMMENDATIONS

Recommended Action: Negative Determination with Condition

A Positive Threshold Decision (PTD) was approved in the original IEE as it related to the design, construction and operation of the 20 MW Floating Solar PV Plant. However, the Scoping Statement determined that potential environmental and social impacts are not significant. Based on this finding, BEO/OAPA is requested to withdraw approved PTD and approve Negative Determination with Condition. As stipulated in Section 1.1 and 2 above.

4.0 Climate Change Risk Screening

There is no change in the risk rating for climate change vulnerability (high). Please see original IEE. The implementer shall be responsible for the following to minimize impacts from climate change:

1. Implementing partner shall seek meteorological data for its design and operation of the plant from Afghan government institution with support from USAID.
2. High quality construction material will be used and regular maintenance shall be done to decrease damage from snow, wind and heat.
3. Water in the reservoir shall be monitored and regulated to prevent damage to the solar panel arrays.
4. Proper communication channels shall be established with Afghanistan’s meteorological service and other relevant agencies or organizations who deal with disaster management to be better informed about extreme weather events.

5.0 Revisions

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the project might be “major” and the project’s effect “significant,” or if additional activities are proposed that might be considered “major” and their effects significant,
this IEE will be reviewed and revised by the originator of the project and submitted to the BEO/OAPA for approval and, if appropriate, an environmental assessment will be prepared. It is the responsibility of the USAID COR/AOR to keep the Mission Environmental Officer, USAID/Afghanistan and the BEO/OAPA informed of any new information or changes in scope and nature of the activity that might require revision of the IEE.
APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS:
IEE Amendment 1 for 20-megawatt (MW) floating solar plant in Naghlou.

Clearances:  Date:

COR/Activity Manager:  Mariam Stanekzai  1/9/2020
Bahrobor

Office Director/OI:  Blake Crystals  1/14/20

Mission Environmental Officer:  Hameedullah Noori  1/9/2020

Regional Environmental Advisor/SCA & OAPA:  cleared by email  1/10/2020
Andrei Barannik

Office of Acquisition and Assistance:  Aaron Ruble  15 JAN 2020

Acting Deputy Mission Director:  Elizabeth Chambers  1/20/2020

Approval:  Date:

Mission Director:  Peter Natiello  1/20/20

Concurrence:  Date:

Bureau Environmental Officer/OAPA:  Christopher Payne  1/31/2020

DISTRIBUTION:  MEO, COR, OAA and RLO
Noori - reviewed one more time - looks OK - Mission should consider submitting SS with IEE Amnd to Chris Payne, BEO/OAPA with needed request re PDT to NDC. W/r, Andrei P.S. Looking at the photos, I noted that there some landslide prone areas, which should be avoided when selecting location of the floating solar

On Tue, Jan 14, 2020 at 12:41 AM Hameedullah Noori <hnoori@usaid.gov> wrote:
Hello Andrei,

Please see revised version of the ESS for Naghlu floating solar plant. The only change in this version is that we eliminated some of the appendices such as IEE, SoW for SS, CV of the SS writer.

Thank you

Noori

On Sun, Dec 29, 2019 at 4:03 AM Andrei Barannik <abarannik@usaid.gov> wrote:

Noori -

While on annual leave, I reviewed, as requested, the updated draft SS (167 p) together with a table of Consultant’s responses and have the following comments:

- it’s an improved, pretty good draft SS, with an EMMP, in view of lacking design and consideration of alternatives (e.g., size, technology and location) of a floating solar and related facilities
- I accept/agree (in view of data & info provided in the SS) with the SS’s finding of NO potentially significant adverse environmental and social impacts [also in view of the proposed size of floating solar at 40 ha versus unknown/non-disclosed size of the existing reservoir surface area of the large (in accordance with ICOLD definition) Naglu dam HHP,] which should be confirmed thru the final design process and updating EMMP for construction, O & M, and decommissioning
- "CDA for alternatives" should have read "CBA (cost-benefit analysis) for each alternative" - Consultant should have know key elements of SS/EA
- in response table, the Consultant noted a transboundary nature of the Kabul river basin - this leads to my earlier comment that cumulative impacts should not only consider floating solar and operation of current HP
URGENT For REA review: IEE amendment 1 for Naghlu Floating solar plant

Andrei Barannik <abarannik@usaid.gov>
To: Hameedullah Noori <hnoori@usaid.gov>
Cc: Andrei Barannik <abarannik@usaid.gov>

Fri, Jan 10, 2020 at 1:15 AM

Noori - reviewed - my edits are in the attached - with these I clear. W/r, Andrei

On Thu, Jan 9, 2020 at 1:22 AM Hameedullah Noori wrote:

Hello Andrei, please see attached IEE amendment-1 for Naghlu floating solar plant for your review.

Thank you

Hameedullah NOORI
Mission Environmental Officer
Office of Program and Project Development (OPPD)
US AID | AFGHANISTAN
Tell: +93 (0) 706 518755
Ext. 3614

Andrei D. Barannik
Regional Environmental Adviser for Central and South Asia, and for Office of Afghanistan and Pakistan Affairs,

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E-mail: abarannik@usaid.gov

USAID Environmental Compliance Database: https://ecd.usaid.gov/

LAND | URBAN & https://www.climatelinks.org/

NRM https://rmportal.net/about

Please consider the environment before printing this email

THIS E-MAIL IS UNCLASSIFIED AS DEFINED BY E.O.12958
While on annual leave, I reviewed, as requested, the updated draft SS (167 p) together with a table of Consultant's responses and have the following comments:

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- "CDA for alternatives" should have read "CBA (cost-benefit analysis) for each alternative" - Consultant should have know key elements of SS/EA.
- In response table, the Consultant noted a transboundary nature of the Kabul river basin - this leads to my earlier comment that cumulative impacts should not only consider floating solar and operation of current HP (where the dam may be potentially raised and dredging take place, which should trigger appropriate sequencing of proposed actions,) but what is a potential for any existing and/or planned projects in the catchment to have an impact on HPP, reservoir and floating solar (together with climate change) - this is a Q for regional economic development planning (is a proposed Shahtoot Dam in a Kabul River Basin?!)?
- Some of docs I shared after reviewing earlier draft seems not considered, particular related to WB Naglu project as provided on its web-site, also: https://www.youtube.com/watch?v=r-_kliZ25B0

In any case, I would suggest that after Mission reviews this SS, it submits the doc to Chris for his review and approval, and amendment of the original IEE, which shall stipulate:

https://mail.google.com/mail/u/0?ik=cb2a0b5fa&view=pt&search=all&permmsgid=msg-f%3A1654208347122663234&dsqt=1&simple=msg-f%3A16542... 1/4
1. request to BEO/OAPA to withdraw PTD and reverse it to NDC with a condition to update comprehensive EMMP to the final design, site and associated infrastructure/facilities (construction, O & M, and decommissioning phases)
2. review of SS & EMMP, incl. final by GOA NEPA with NOC, and availability/issuance of all mandated permits, licenses, etc.
3. review and approval of the final EMMP (with any additional env benchmarking env monitoring, e.g. water, fauna, etc.) with $ budget & capacity building effort for DABS by BEO/OAPA prior to start of construction

That’s all from me, and I clear final SS draft with recommendations above.

W/r,
Andrei

On Thu, Dec 26, 2019 at 5:51 AM Hameedullah Noori <hnoori@usaid.gov> wrote:

Hi Andrei,

Please see attached revised version of the environmental scoping statement ESS for the Naghlu Floating Solar Power Plant. They have addressed some of our comments and some of them are there due to the final design and specific site selection and lack of feasibility study. In the study they have confirmed that there will be no significant environmental and social impacts considering the mitigation measures in the draft EMMP. I am still reviewing.

Thanks

Noori

----- Forwarded message -----
From: Sabahbure, Kiran <Sababure@tetratech.com>
Date: Tue, Dec 24, 2019 at 6:18 PM
Subject: A-011 NFSPP Final ESS Rev0_2019-12-24
To: Leslie Esp <gtesp@tetratech.com>
Cc: Bahro Bar <bahrobar@usaid.gov>, Talea Scif, Salem <talea.scif@tetratech.com>, High, Andrew <Andrew.High@tetratech.com>, Ahmed Mushlaq Saeed <ahmed.saeed@usaid.gov>, Marlam Stanezai <Nazarenus.Magpie@tetratech.com>, Maggie <Maggie.Nazarenus@tetratech.com>, Harry Bottenberg <h.sddi@tetratech.com>, Zaki Saeed <zaki.saeed@usaid.gov>, Hamidullah Noori <hnoori@usaid.gov>, Omarkhali <NasrAhmAd.NasrAhmAd.Omarkhali@tetratech.com>, Gawhari, MohammadNasr <MohammadNasr.Gawhari@tetratech.com>, GLS.ESP <GLS.ESP@tetratech.com>

Hi Leslie,

Tt ESP is pleased to submit, the Final Environmental Scoping Statement (ESS) for the Naghlu Floating Solar Power Plant. This report comprises of deliverables 5 and 6 under Activity 011 and was prepared in accordance with the Revision 3 of the Implementation plan.

I am also attaching our responses to USAID’s comments on the Naghlu draft ESS.