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: July 2020         LOP Amount: $3,000,000

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

IEE Amendment (Y/N): Y         If “Yes,” Number and Date of Original IEE: ME 18-49 / May 17, 2018, amendment 1 ME 19-49 / July 26, 2019

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: ☐

This is an amendment to the IEE ME 18-49, amended later under ME 19-49 in order to extend the period of performance from April 2020 to July 2020. Changes are highlighted in YELLOW. Otherwise, all other terms remain the same as the original IEE.

BACKGROUND

USAID/Lebanon has historically been under-staffed to adequately oversee its programs 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. Today, the Mission has less than half the staff to manage its program and budget that a standard USAID Mission would employ. The Mission is in the current process of recruitment of additional Foreign Service Nationals (FSN) staff and is in dire need of additional office space to accommodate these individuals. A new USAID office space is therefore needed to house the increase in the number of FSNs...
required for effectively managing the Mission’s growing portfolio and safeguarding it against potential vulnerabilities.

**USAID/Lebanon procured 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 on top of an identical existing FE/BR office. The contract started in June 13, 2019 and was estimated to end in April 2020. Due to the prevailing COVID-19 pandemic, it is estimated to end in July 2020.

The office design was developed in coordination with USAID/Lebanon, USAID’s Bureau of Overseas Management Division (OMD), DOS Bureau of Diplomatic Security (DS), and 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.

**Table 1: Activities and recommended threshold decisions**

<table>
<thead>
<tr>
<th>No</th>
<th>Activities</th>
<th>Effect on Natural or Physical Environment</th>
<th>Determination and Reg. 216 actions required</th>
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</table>
| I  | All activities under Phase 1 & 2 that comprise of:  
- Engineering designs  
- Engineering desk reviews  
- Data compilation and analysis | No effect | **Categorical Exclusion**, no actions required. **per** 22 CFR 216.2 (c)(2)(iii) as “analysis, studies, academic or research workshops and meetings”, 22 CFR 216.2 (c)(2)(v) “document and information transfers” |
| II | Activities under Phase 3, which comprise of:  
- Transport and lifting of prefabricated steel unit to the US Embassy compound  
- Assembly of the prefabricated units on top of the existing USAID office  
- Furnishing of the new office  
- Connection of the office to utilities (water, electricity, and drainage) and commissioning | Potential for a significant adverse effect of one or more activities | **Negative Determination with Conditions**  
USAID 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](https://overseasbuildings.state.gov/sites/admin-overseasbuildings.state.gov/files/pdfs/green_guide_2.pdf) |
**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 fabrication, delivery and completion 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](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 ruled 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 and the relatively short duration of the installation activities (around three months), the supervisory staff provided by the service provider will be sufficient for compliance with this procurement EMMP 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](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 AOR 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 Trailer Office

CLEARANCE:

Local Development Office Director
E-Cleared _______ April 6, 2020
Claude Zullo Date

Mission Environmental Officer
E-Cleared _______ April 6, 2020
Sana Saliba Date

Regional Environmental Officer
Cleared by email______________ 6-Apr-20
Christopher Frey Date

Program Office
E-Cleared _______ April 6, 2020
Patrick Goodwin Date

APPROVAL:

Mission Director
Approved by Email (attached) _______ April 7, 2020
Anne Patterson Date

CONCURRENCE:
Bureau Environmental Officer

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ATTACHMENT:
1- OBO green_guide_2

DISTRIBUTION:
Mission Environmental Officer
IEE File
OAA File