



USAID/ANE Reg. 216 Training Skits

- 1) Read the skit
- 2) Divide yourself into spokesperson roles
- 3) Then and act out the skit

Objective: To tap the innovativeness, creativity, and joyfulness of participants in demonstrating their knowledge of the Reg. 216 process in a memorable way.

1. Afghanistan 07-104

USAID/Afghanistan's "Strategic Provisional Roads (SPR) – South and East (S&E) Afghanistan Rehabilitation Program (ARP)" will increase stability and security in Southern and Eastern Afghanistan by rehabilitating roads. The program will rehabilitate 1,500 to 2,000 kilometers of existing provincial gravel roads to an all-weather gravel road standard. SPR-ARP includes special assistance components (capacity building, community development) to maximize impact and ensure sustainability of the roads. Road rehabilitation will, in most cases, not require realignment of the existing roadway. Construction activities include: roadbed preparation to improve the sub-grade, soil cutting and filling and compaction, and rehabilitation of existing drainage systems to improve drainage with culverts and draining basins. These repairs will import, move and alter large quantities of native soil; raise the roadbed above the existing level of the land; modify the natural drainage ways by generating road runoff and reshaping existing land surfaces; and provide new drainage to eliminate water on the roads which would otherwise quickly deteriorate the roads.

SKIT:

Activity Manager wants a Categorical Exclusion and a Negative Determination with Conditions to reconstruct 2,000 km of all-weather gravel roads under a \$2,000,000 strategic provincial roads program, based on the contractor's experience in road reconstruction in the country.

MEO concurs.

Washington Information Officer presents case to Washington ESP.

Washington Environmental Advisor recommends a Positive Determination requiring a Scoping Statement (SS) followed by a Programmatic Environmental Assessment (PEA), both with stakeholder inputs as raising the land will alter drainage.

Mission Director and Washington BEO wants to see resolution.

2. Egypt 08-07

The Egypt-Mission EA for the City of Luxor Groundwater Lowering of Antiquities Sites on the West Bank, Secondary Cities Project (SCP, 263-0236) did not find any substantial negative impacts of the proposed activity on the physical or natural environment. The impact of discharging the water collected from the dewatering process into the River Nile or into nearby drains or canals is expected to be negligible. Initial laboratory analysis results of samples collected from the project sites showed that the quality of collected water complies with Egyptian Law, but it is not clear what the law addresses. In addition, the discharged groundwater load or volume is expected to be minor compared with the load of any receiving water body but no volumetric estimates are given other than estimated average discharge (mean) rates. Nevertheless, several environmental aspects are to be addressed during project implementation. During planning and construction, the environmental and social obligations of the contractor will be comprehensively specified through contract documents, and shall include: spill prevention, control, cleanup; dust and noise abatement; site management practices to mitigate intermittent impacts to the area and the tourism industry; shoring to preserve structure integrity of existing structures; mitigation and monitoring of cultural impacts; decommissioning. The contractor shall implement monitoring programs concerning community and worker health and safety, construction activities, groundwater, groundwater levels, pumps and pump station operations, and quality of water discharged to drains.

The EA does not contain a groundwater or receiving water sampling and analysis plan, water quality analysis quality assurance/quality control plan, water quality objectives data analysis plan, or ecological or environmental risk assessment for aquatic life in receiving waters or for the intended water use of the receiving waters.

SKIT:

CTO submits an Environmental Assessment for a \$9,000,000 project to remove shallow groundwater which is rotting Egyptian antiquities in the West Bank of the Rive Nil at Luxor, an important international tourist attraction. The rotting is caused by water-logging and excessive salts and chemicals which interact to damage the antiquities. The EA states that groundwater samples were collected and they meet Egyptian Law 98.

MEO concurs.

Washington Environmental Advisor rejects the EA because it does not present nor discuss the analytical laboratory results, indicate if agricultural chemicals, sanitation parameters, and salts were analyzed, and the effect of mixing dewatered groundwater with the receiving Nile waters.

Mission Director and Washington BEO want to see resolution.

3. India 08-09

USAID/India's "Tsunami Reconstruction (India)" program includes three components: 1) relief; 2) transition; and 3) governance. Component 1 relief activities include donations, awards, and grants under "international disaster assistance." Component 2 transition activities include extending work to improve and maintain shelters, water, sanitation, and waste management systems; grants for skills development and anti-trafficking; microfinancing; disaster planning and preparedness; as well as provision of small-scale latrines, water points, waste management services, and drainage facilities at existing developed sites. Component 3 governance activities include technical assistance and training to generate review, financial management, and potential municipal water and beach front development.

SKIT:

MEO notes that an ongoing \$60,000,000 tsunami reconstruction project in India with community-based initiatives now has installed a chlorinator for wastewater treatment, constructed a wooden-based playground, modified commercial fish ponds by interconnecting the ponds with canals, and improved several road stretches. None of these construction activities were anticipated in the approved Initial Environmental Assessment. Chlorine is an acutely hazardous material which annual kills hundreds of people, mainly in the Indian Subcontinent, due to train derailments and other accidents. **Mission Environmental Supervisor** wants closure.

Washington Environmental Advisor recommends... What? Why? What is the potential problem with chlorine gas?

Mission Director and Washington BEO want to see resolution.

4. Iraq 08-06

Iraq Mission often does not have a Mission Environmental Officer (MEO), yet has significant programs. The Mission has a high turn-over rate and works under challenging physical and psychological conditions which limit the ability to conduct field work, consult with stakeholders and the public, and operate under normal development procedures. A large-scale long-going agricultural project is upgraded with a new extension, requiring conformance to the Foreign Assistance Act's Pesticide Procedures, generally met through a Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP). An experienced entomologist is contracted and drafts the PERSUAP for Mission approval. Months pass. Finally, an Iraq Program Officer sends the PERSUAP to a Washington Information Officer to get BEO approval for the PERSUAP.

SKIT:

Iraq Program Officer asks Washington Information Officer for help.

Washington Information Officer is asked by the Mission to get Washington approval for a PERSUAP for the extension of the Agricultural Reconstruction and Development Program for Iraq. As there is no MEO or backup in Iraq, what shall he do?

Washington Environmental Advisor is reluctant to clear anything without assurance of implementation.

Mission Director and Washington BEO want to see resolution.

5. Jordan TBS

A new Regional Legal Advisor (RLA) reviews a Jordanian program with several specific, well-defined programs. As the programs are very specific, the RLA believes the environmental recommendations should be specific too and not generalized, nor lumped together into similar categories. The Mission in the past has lumped their specific programs together into similar categories, which has been approved by the ANE BEO.

SKIT:

RLA wants a decision specified explicitly for each activity.

MEO wants a decision specified explicitly for each type of activity.

Washington Environmental Advisor wants whatever is workable for the Mission to implement, compliant with Reg. 216.

Mission Director and Washington BEO want to see resolution.

6. Lebanon 07-95

Two Environmental Impact Assessment (EIA) studies were previously conducted on the existing solid waste management site in Zahleh. The first one was prepared by *Libanconsult* for the Council of Development and Reconstruction (CDR) in 1995, which examined the impacts of the establishment of a sanitary landfill to serve the Caza of West Bekaa [which refers to the existing sorting facility and sanitary landfill in Zahleh]. The project was funded by the Solid Waste Environmental Management Program (SWEMP), which was supported by a loan secured by the GoL (CDR) from the International Bank for Reconstruction and Development (IBRD). Since two EIA studies have been conducted, the contractor Cooperative Housing Foundation (CHF) asked the American University in Beirut (AUB) to conduct a review of these studies and examine the potential impacts that the EARTH program might have on the surrounding environment and propose mitigation measures to be included in the design of the proposed facilities. In addition to reviewing the first EIA of the existing facility, AUB conducted geotechnical and hydrogeologic investigations, and water and leachate sampling and analysis; identified the potential impacts of the planned activities and proposed mitigation measures to these impacts and developed monitoring activities to be implemented during the operation phase. CHF made sure that all mitigation measures be incorporated in the design of the facilities to ensure long-term environmental protection. Through this process, CHF would have completed the technical requirements of USAID CFR 216 regulations.

SKIT:

CTO has an existing Environmental Assessment prepared by a Lebanese agency, in French, for the \$3,200,000 Zahle Solid Waste Treatment Plant expansion project.

MEO wonders if this EA is Reg. 216-compliant.

Washington Environmental Advisor favors acceptance, but his French is très mal.

Agency Coordinator prefers documents in English.

Mission Director and Washington BEO want to see resolution.

7. Pakistan 06-07

Through the “Pakistan Reconstruction Special Objective (SpO 391-008),” USAID/Pakistan will support recovery and reconstruction efforts from the devastating October 8, 2005 earthquake that caused massive loss of life, damage, and displacement in Pakistan’s North-West Frontier Province (NWFP) and the Pakistanian-administered area of Kashmir. The purpose of the SpO is to re-build health infrastructure and key education facilities and re-establish livelihoods and shelter for those affected by the earthquake.

Technical assistance. Technical assistance, assessments, training, capacity and management skills, education, scholarships, collaborations, supporting non-governmental organizations (NGO), strengthening family and community capacity, vocational-technical training, awareness building, occupational development, research, extension and outreach services are not expected to have any impact on the natural or physical environment, and therefore qualify for Categorical Exclusion per 22 CFR 216.2 (c)(2)(i).

Small-scale construction. Small-scale rehabilitation of existing buildings or new construction of primary and secondary schools and health care facilities on existing developed land and alignments qualify for Negative Determination with Conditions per 22 CFR 216.3 (3)(iii), the Conditions being environmentally sound design, monitoring and evaluation, and best management practices to minimize erosion and debris and waste production, and proper disposal of debris and waste. Implementation contractors and partners shall be trained by USAID in developing and implementing an environmental assessment checklist, and in monitoring and evaluating their projects to assure implementation of sound environmental design and management. The checklist shall be site-specific and identify mitigation measures and BMPs to implement. The Contractor will conduct environmental screening to identify and document those construction activities that are small in scale and at lower risk causing environmental damage.

Large-scale or new construction. Large-scale construction of new healthcare facilities, administration buildings, universities, or schools qualify for a Positive Determination per 22 CFR 216.2 (3) and require a scoping statement for an Environmental Assessment (EA) and an EA, both of which require discussion and input from local stakeholders and appropriate local, regional, and national agencies in Pakistan.

SKIT

Engineering Activity Director wants an Environmental Assessment for hospital reconstruction in earthquake response, as part of an \$18,000,000, highly visible reconstruction program.

MEO is uncertain.

Washington Environmental Officer visits the sites, observes they are built-up, but destroyed hospitals on already developed land, and suggests a Negative Determination with Conditions. What are the Conditions?

Contractor proposes an EA.

Mission Director and **Washington BEO** want closure.

8. Philippines 07-147

The damage and destruction caused by the super-typhoon DURIAN and associated floods, landslides, and high winds destroyed thousands of homes and dozens of villages in November-December 2006 in the Philippines' Bicol Region Area, 250 miles southeast of Manila. These natural events resulted in displacement of thousands of people. USAID/Philippines through grants to Save the Children Foundation (SCF) and the International Organization for Migration (IOM) is supporting typhoon reconstruction in Bicol for internally displaced persons (IDP). The Environmental Threshold Decision (ETD) for the USAID/Philippines Bicol Typhoon Reconstruction determined that construction of 350 reinforced-concrete, typhoon-resistant housing units and community center at both the Mauraro Resettlement Site in Guinobatan Municipality and Tagaytay Resettlement Site in Camalig Municipality, Albay Province, Bicol Region qualifies for Positive Determination per 22 CFR 216.3 (a)(2)(iii) because project components may have potential significant adverse impacts on the environment.

As a result, a Programmatic Environmental Assessment (PEA) scoping process for a scoping statement (SS) and PEA are required, both involving stakeholder participation. Both sites were selected, physically cleared, approved, and donated by the Philippine Government in cooperation with the National Housing Authority (NHA) and Local Government Units (LGU) from previously agricultural land. These agencies agreed to provide drinking water, electricity, wastewater collection from septic tanks, solid waste collection, road access, health centers, and schools to these two resettlement sites for qualified IDPs. USAID in cooperation with SCF and IOM conducted scoping sessions or public consultations to prepare the scoping statement and PEA. The PEA addresses the identified environmental concerns (soil erosion, dust, earthquakes, water pollution, wastewater generation and pollution, landslides, flooding, solid waste management) and describes construction and post-construction mitigation measures. The SS was approved as ANE 07-146 on September 17, 2007.

SKIT:

Mission Director wants to expedite the Environmental Assessment process for \$5,000,000 Albay-Bicol typhoon reconstruction which includes construction of 1,000 homes in two new undeveloped sites for internally displaced persons. Utilities will be provided by local governments.

MEO has limited in-house resources.

CTO has two on-site contractors.

Washington Environmental Advisor visits sites, meets and trains contractors to perform scoping meetings and draft scoping statement and Programmatic Environmental Assessment.

Mission Director and **Washington BEO** want closure.

9. West Bank/Gaza 08-12

USAID/West Bank-Gaza (WBG)’s “Water-Resources Infrastructure Needs Program (WR-IFNP)” is a five-year program that will involve construction and rehabilitation of physical infrastructure in the West Bank. The WR-IFNP will consist of two phases: 1) planning and design work through a U.S. engineering firm to provide engineering design and construction management services (CMS); and 2) construction activities through construction contractors. Phase 1 activities include preparation of feasibility studies, master planning, conceptual designs, plans, specifications, environmental studies, final designs, cost estimates, and CMS. Phase 2 activities include construction activities to implement the engineering designs. Phase 1 is not expected to have a direct adverse impact on the environment. Phase 2 activities will be identified during the implementation of Phase 1. The environmental consequences for Phase 2 activities will be addressed in the future after more details are available about the type, size, and sites.

SKIT:

CTO wants to defer decisions for an upcoming \$190,000,000 Water-Resources Infrastructure Needs Program.

MEO concurs.

Washington Environmental Advisor recommends Negative Determination with Conditions. What are the Conditions?

Mission Director and **Washington BEO** want closure.

10. Afghanistan USACE-Roads 08-34

USAID/Afghanistan's "SO 306-005 Spin Boldak-Bikah Road" is a \$20,000,000 Afghanistan Infrastructure Reconstruction Program (AIRP) program to connect a town and a village by a 70-km road in Kandahar Province. The Environmental Threshold Decision (ETD) was a Positive Determination requiring a Scoping Statement (SS) followed by a Programmatic Environmental Assessment (PEA), both with stakeholder input. USACE, the USAID contractor, prepared a technically sound SS without stakeholder input. The Mission has a high turn-over rate and works under challenging physical and psychological conditions which limit the ability to conduct field work, consult with stakeholders and the public, and operate under normal development procedures. The Mission-approved, USACE-prepared SS did not provide documentation for stakeholder consultants or inputs, as stakeholders were not included in its preparation.

SKIT:

CTO wants ANE BEO approval of the Scoping Statement.

MEO concurs.

Washington Environmental Advisor recommends holding stakeholder consultants for stakeholder inputs to the Scoping Statement prior to ANE BEO-approval.

USACE Chief of Party is uncomfortable seeking stakeholder meetings under Afghanistan field conditions.

Mission Director and **Washington BEO** want closure.