

# ATTACHEMENT 1



# USAID | WEST BANK/GAZA

FROM THE AMERICAN PEOPLE

## Environmental Documentation Instructions for USAID Grants and Subgrants,

### Note

These instructions accompany the “Environmental Documentation Form for Grant and Subgrant Activities”

### Who must submit subgrant environmental documentation?

This form is required of each activity sponsored by USAID under the ASHGHAL Program except those activities which USAID has determined, in writing, to warrant Categorical Exclusions from environmental compliance procedures.

### Step 1. Provide requested “Applicant information” (Section A of the form)

### Step 2. List all components in the activities

In Table 1 (Section B) of the form, list all activities associated with the subgrant activities. Include all phases: planning, design, construction, operation & maintenance. Include ancillary activities. (These are activities that are required to build or operate the primary activity. Examples include building or improving a road to provide heavy vehicles access to the project site, excavation of fill material or gravel for construction, laying utility pipes to connect with energy, water sources or sewage disposal.)

### Step 3. Screening: Identify low-risk and high-risk activities

For *each* activity listed in Table 1, refer to the list of examples below to determine whether it is very low-risk, high risk, or moderate risk. (Activities which do not appear in either the low-risk or the high-risk list are considered moderate risk by default). Enter the results in Table 1.

Very low-risk activities (§216.2(c)(2))	High-risk activities (§216.2(d)(1))
<p>Provision of education, technical assistance, or training. (Note that activities directly affecting the environment. do not qualify)</p> <p>Community awareness initiatives.</p> <p>Controlled experimentation exclusively for the purpose of research and field evaluation confined to small areas and carefully monitored (when no protected or other sensitive environmental areas could be affected).</p> <p>Technical studies and analyses and other information generation activities not involving intrusive sampling of endangered species or critical habitats.</p> <p>Document or information transfers.</p> <p>Nutrition, health care or family planning. (a) some included activities could directly affect the environment (construction, water supply systems, etc.) or (b) biohazardous (esp. HIV/AIDS) waste is handled or blood is tested.</p> <p>Rehabilitation of water points for domestic household use, shallow, hand-dug wells or small water storage devices (when no protected or other sensitive environmental areas could be affected). Note that USAID guidance on potable water requires water quality testing for arsenic, coliform, nitrates and nitrites.</p> <p>Support for intermediate credit arrangements (when no significant biophysical environmental impact can reasonably be expected).</p> <p>Programs of maternal and child feeding conducted under Title II of Public Law 480.</p> <p>Food for development programs under Title III of P.L. 480, when no on-the-ground biophysical interventions are likely.</p> <p>Studies or programs intended to develop the capability of recipients to engage in development planning. (Activities directly affecting the environment do not qualify)</p>	<p>River basin or new lands development</p> <p>Planned resettlement of human populations</p> <p>Penetration road building, or rehabilitation of roads (primary, secondary, some tertiary) over 10 km length, and any roads which may pass through or near relatively undegraded forest lands or other sensitive ecological areas</p> <p>Substantial piped water supply and sewerage construction</p> <p>Major bore hole or water point construction</p> <p>Large-scale irrigation</p> <p>Water management structures such as dams and impoundments</p> <p>Drainage of wetlands or other permanently flooded areas</p> <p>Large-scale agricultural mechanization</p> <p>Agricultural land leveling</p> <p>Procurement or use of <u>restricted use</u> pesticides, or wide-area application in non-emergency conditions under non-supervised conditions</p> <p>Light industrial plant production or processing (sawmill operation, agro-industrial processing of forestry products)</p> <p><b>High-risk and typically not funded by USAID:</b></p> <p>Actions determined likely to significantly degrade protected areas, such as introduction of exotic plants or animals</p> <p>Actions determined likely to jeopardize threatened &amp; endangered species or adversely modify their habitat (esp. wetlands, tropical forests)</p> <p>Conversion of forest lands to rearing of livestock</p> <p>Planned colonization of forest lands</p> <p>Procurement or use of timber harvesting equipment</p> <p>Commercial extraction of timber</p> <p>Construction of dams or other water control structures which flood relatively undegraded forest lands</p> <p>Construction, upgrading or maintenance of roads (including temporary haul roads for logging or other extractive industries) which pass through relatively undegraded forest lands.</p>

#### Step 4. Determine if you should write an environmental review

Examine the screening results as they are entered in Table 1.

- If ALL the activities are “very low risk,” then no further review is necessary. In Section C of the form, enter “subgrant categorical exclusion” as your recommended determination. Skip to Step 8 of these instructions.
- If ANY activities are “moderate risk,” you must list mitigation measures to be followed, and should consider completing an environmental review to address these activities. Proceed to Step 5. USAID may require an environmental review.
- If any activities are high risk, note that Regulation 216 usually requires a full environmental assessment study (EA). Rather than commit to such a study, it is recommended that you complete

an environmental review addressing these activities to determine if a full EA will indeed be required. Because these activities are assumed to have a high probability of causing significant, adverse environmental impacts, they are closely scrutinized. *Any* proposed high-risk activity should be discussed in advance with USAID.

In some cases, it is possible that effective mitigation and monitoring can reduce or eliminate likely impacts so that a full EA will not be required. If the applicant believes this to be the case, the environmental review must argue this case clearly and thoroughly. Proceed to Step 5.

## 5. Write the environmental review, if appropriate

The environmental review is a typically short, 2–3 page document. It follows the outline below. It presents the environmental issues associated with the activities. It also documents the mitigation and monitoring commitments made by the subgrantee. Its purpose is to allow the subgrantee and USAID to evaluate the **likely environmental impacts of the project**.

- A. **Summary of subgrant.** Summarize background, rationale and outputs/results expected. (reference to proposal, if appropriate).
- B. **Description of activities.** For all moderate and high-risk subgrant activities listed in Table 1 of the form, succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during construction and who will undertake them. (All of this information can be provided in a table). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.
- C. **Environmental Situation.** Describe the environmental characteristics of the site(s) in which these activities will take place. Focus on characteristics of the site that are of concern—e.g., water supplies, animal habitat, steep slopes, etc. Is the environmental situation at the site degrading, improving, stable with regard to these critical characteristics?
- D. **Evaluation of Activities and Issues with Respect to Environmental Impact Potential.** Include impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with abandoning, restoring or reusing the site at the end of the anticipated life of the facility or activity.

Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.)

Indicate any beneficial impacts and how the sustainability of the natural resource base will be improved.

- E. **Environmental Mitigation Actions (including monitoring).** Provide a workplan and schedule identifying the following:

**Mitigation measures.** Identify the means taken to avoid, reduce or compensate for impacts. (For example, restoration of borrow or quarry areas, replanting of vegetation, compensation for any relocation of homes and residents.) If standard mitigation or best practice guidance exists and is being followed, cite this guidance.

**Monitoring** Indicate how mitigation measures will be monitored to ensure that they accomplish their intended result. If some impacts are uncertain, describe the monitoring which will be conducted to identify and respond to these potential impacts.

**Responsible parties.** Identify *who* will undertake mitigation and who will conduct the monitoring, and at what frequency.

- F. **Other Information.** Where possible and as appropriate, include photos of the site and surroundings; maps; or list the names of any reference materials or individuals consulted. (Pictures of the site can substantially reduce the written description required in parts B & C)

## **6. Based on the environmental review, reach a recommended determination for each high-risk or moderate-risk activity**

For each high-risk or moderate-risk activity, the environmental review will help you decide between one of three recommended determinations:

- **no significant adverse impacts.** The activity in question will not result in significant, adverse environmental impacts. Special mitigation or monitoring is not required. Typically does not apply to high-risk activities.
- **no significant adverse impacts given appropriate mitigation and monitoring** With appropriate mitigation and monitoring, none of the subgrant activities will result in significant, adverse environmental impacts.
- **significant adverse impacts.** One or more of the subgrant activities is likely to cause significant adverse environmental impacts and cannot be mitigated with best practices or other measures. A full environmental assessment will be required.

Enter these determinations in Table 1.

### **Step 7: Summarize recommended determinations**

In section C of the form, summarize your recommended determinations by checking ALL categories indicated in Table 1.

**Step 8. Sign certifications** (Section D of form), attach mitigation measures or environmental review.

**Step 9. Submit forms and supporting documents to USAID project officer (CTO)**



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## Environmental Documentation Form for Grant and Subgrant Activities

### A. Applicant information

Subgrantee (organization)	Parent grant or project
Individual contact and title	Address, phone & email (if available)
Subgrant activity (brief description)	Amount of subgrant
Location of subgrant activity	Start and end date of subgrant activity

### B. Activities, screening results, and recommended determination

TABLE 1  Proposed subgrant activities	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate and high-risk activities)		
	Very Low Risk	Moderate Risk	High Risk	No significant adverse impact	With specified mitigation, no significant adverse impact	Significant Adverse impact
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						

(continue on additional page if necessary)

C. Summary of recommended determinations (check all that apply)

The subgrant contains. . .	<i>(equivalent regulation 216 terminology)</i>
<input type="checkbox"/> Very low risk activities	<i>subgrant categorical exclusion(s)</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>no significant adverse impacts</b>	<i>subgrant negative determination(s)</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>no significant adverse impacts, given appropriate mitigation and monitoring</b>	<i>subgrant negative determination(s) with conditions</i>
<input type="checkbox"/> After environmental review, activities determined to have <b>significant adverse impacts</b>	<i>subgrant positive determination(s)</i>

D. Certification:

I, the undersigned, certify that:

1. the information on this form is correct and complete
2. the following actions have been and will be taken to assure that the activity complies with environmental requirements established for the ASHGHAL Program under the Code of Federal Regulations 22 CFR 216:
  - Those responsible for implementing this activity have received training and/or documents describing essential design elements and best practices for activities of this nature.
  - These design elements and best practices will be followed in implementing this activity, except with the approval of USAID.
  - Any specific mitigation or monitoring measures described in the attached information will be implemented in their entirety.
  - Compliance with these conditions will be regularly confirmed and documented by on-site inspections during the activity and at its completion.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

**BELOW THIS LINE FOR USAID USE ONLY**

**Approval**

USAID Project Officer	(print name)	(signature)
<input type="checkbox"/>	Approved	
<input type="checkbox"/>	Rejected	
USAID MEO	(print name)	(signature)
<input type="checkbox"/>	Approved	
<input type="checkbox"/>	Rejected	

**USAID comments:** (if documentation is rejected, comments must be provided to applicant)