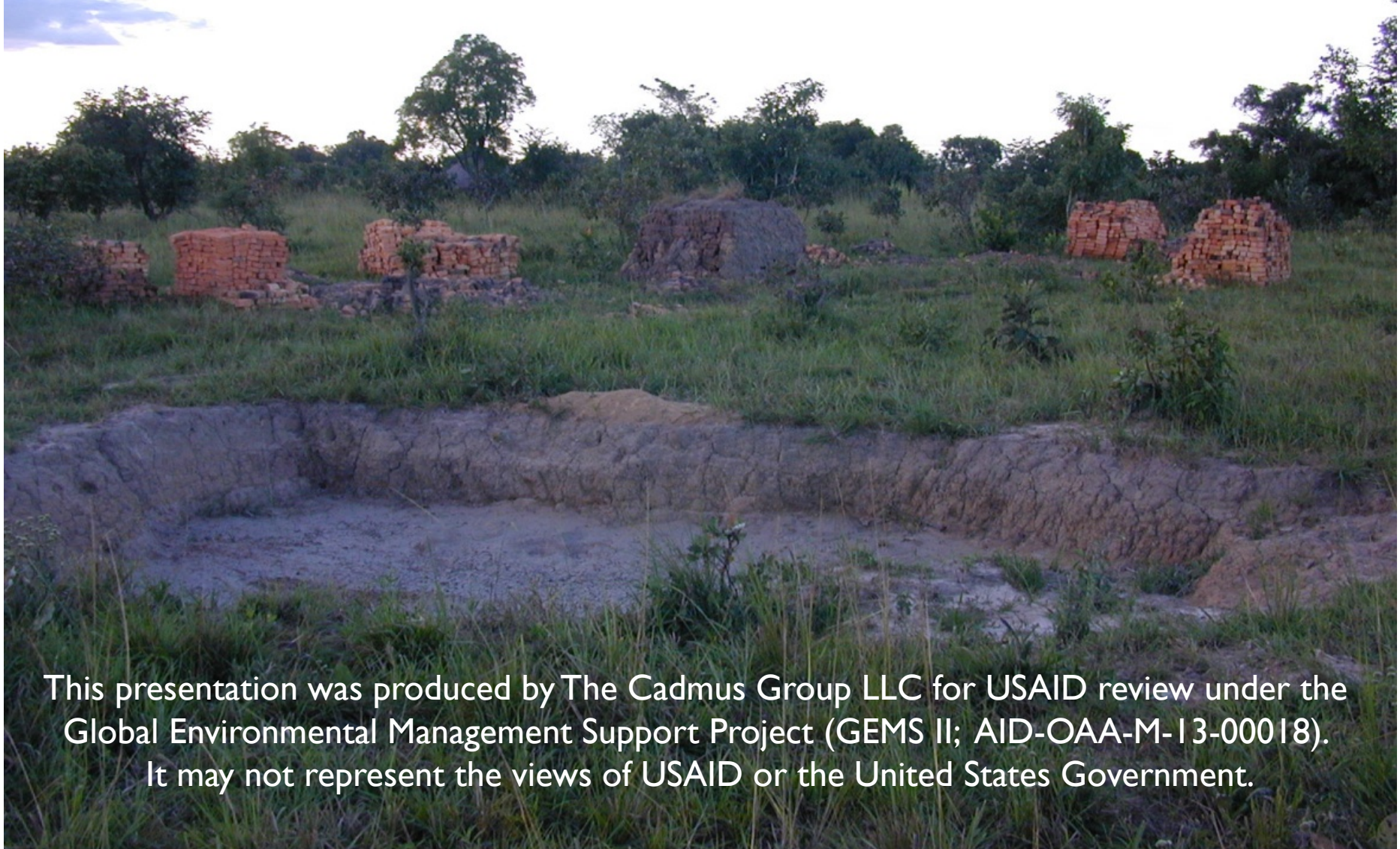




Intro to Environmental Assessments (Full EIA Studies under 22 CFR 216)



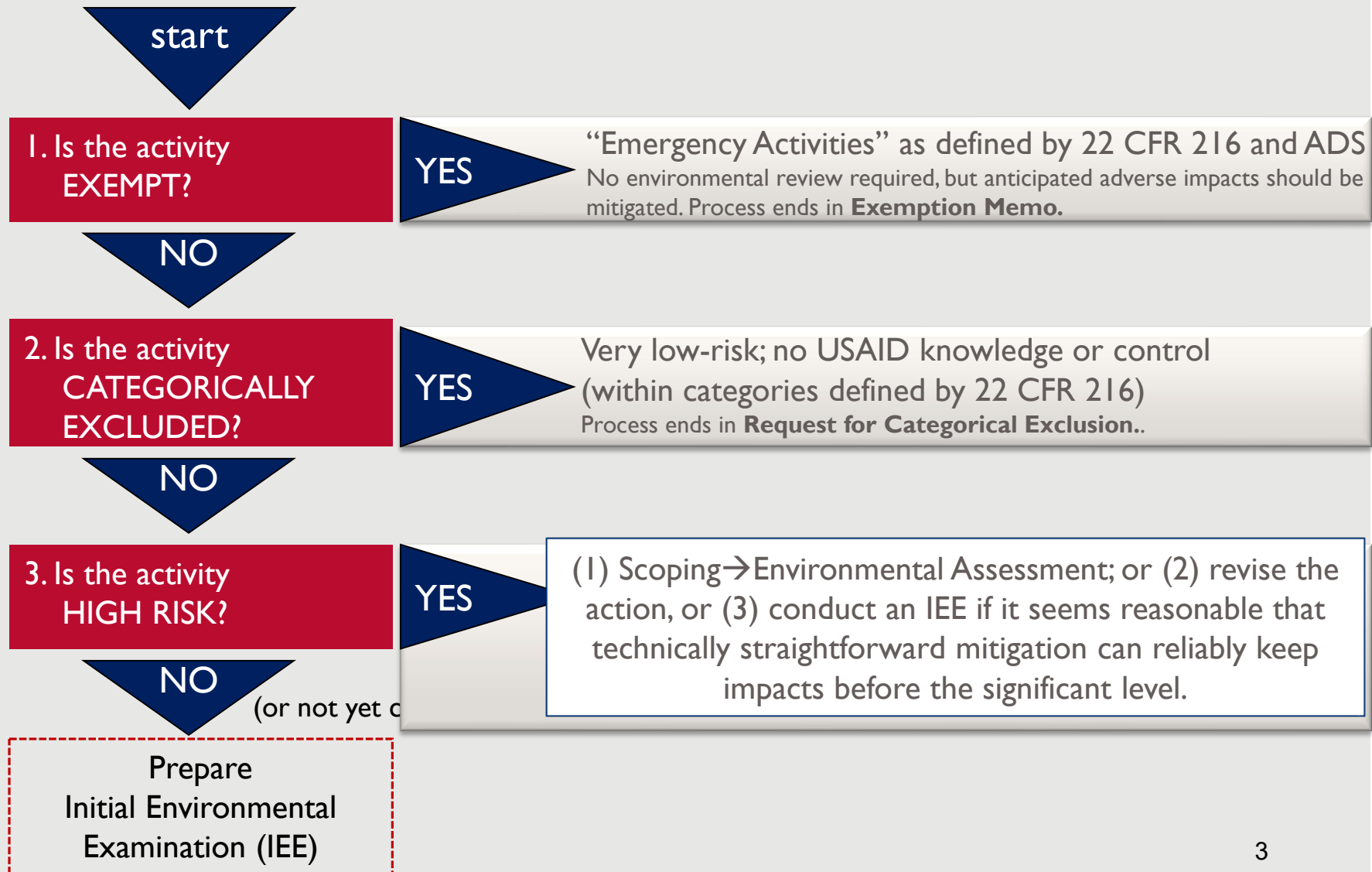
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WHEN IS AN EA REQUIRED?

- Path 1: A “high risk” screening result
- Path 2: A positive determination in an IEE



SCREENING UNDER REG. 216



“HIGH RISK” MEANS:

- activities “for which an EA is normally required”* per 22 CFR 216
- Activities for which FAA 118 & 119 require an EA.

EA DEFINITELY REQUIRED	NOT CLEAR— proceed to IEE
New 500Ha irrigation scheme	Rehabilitation of 50Ha irrigation scheme
Major expansion of a 100MW thermal power plant & construction of new transmission lines	Mini-hydro installations of 500 kw total
Widening 30km of a 2-lane road to 6-lane tollway thru an urban area	Rehabilitation of multiple short segments of rural feeder road
Sections 118 & 119 of the Foreign Assistance Act REQUIRE an EA for . .	*“Classes of actions. . . determined generally to have a significant impact on the environment” (22 CFR 216.2(d))
Activities involving procurement or use of logging equipment	
Activities with the potential to significantly degrade national parks or similar protected areas or introduce exotic plants or animals into such areas	

CLASSES OF ACTIONS NORMALLY HAVING A SIGNIFICANT EFFECT ON THE ENVIRONMENT

22 CFR 216.2(d)

Classes of Actions Normally Having a Significant Effect on the Environment.

- (i) Programs of river basin development;
- (ii) Irrigation or water management projects, including dams and impoundments;
- (iii) Agricultural land leveling;
- (iv) Drainage projects;
- (v) Large scale agricultural mechanization;
- (vi) New lands development;
- (vii) Resettlement projects;
- (viii) Penetration road building or road improvement projects;
- (ix) Powerplants;
- (x) Industrial plants;
- (xi) Potable water and sewerage projects other than those that are small scale.

IEE POSITIVE DETERMINATION → EA

For each activity addressed, an IEE makes one of 4 recommendations regarding its possible impacts:

If the IEE analysis finds...	The IEE recommends a...	Implications (if IEE is approved)
No significant adverse environmental impacts	NEGATIVE DETERMINATION	No conditions. Go ahead.
With specified mitigation and monitoring, no significant environmental impacts	NEGATIVE DETERMINATION WITH CONDITIONS	Specified mitigation and monitoring must be implemented
Significant adverse env. impacts are possible	POSITIVE DETERMINATION	Do full EA or redesign activity. Conditions imposed by the EA must be implemented.
Not enough information to evaluate impacts	DEFERRAL	You cannot implement the activity until the IEE is amended

PLUS, the IEE will address any CATEGORICAL EXCLUSIONS carried over from the screening process.

A **positive determination** triggers a full EIA

IMPACTS NEED NOT BE DIRECT.

SIGNIFICANT ADVERSE INDIRECT OR CUMULATIVE IMPACTS WILL TRIGGER A PD.

REG. 216 SPECIFIES 3 TYPES OF FULL EIA STUDUES

ENVIRONMENTAL ASSESSMENT

Used to assess the environmental effects of a specific project or action

EXAMPLE

An EA to evaluate a single irrigation or health clinic project

PROGRAMMATIC ENVIRONMENTAL ASSESSMENT*

Used to assess the environmental effects of a class of similar actions

EXAMPLE

A PEA to evaluate construction of multiple schools or sustainable forest management plans

*The term in Reg. 216 is "Program Assessment"

Environmental Impact Statement

For activities affecting the US environment or the global commons.

(Very Rare)

Reg 216 does not discuss the content of the PEA in detail, simply stating:

"To the extent practicable, the form and content of the PEA will be the same as for EAs."

HOW IS A FULL ENVIRONMENTAL ASSESSMENT DIFFERENT FROM an Initial environmental examination (IEE)?

- ! A formal scoping process IDs issues to be addressed
- ! Analysis of environmental impacts is much more detailed
- ! Alternatives* must be formally defined. The impacts of each alternative must be identified & evaluated, and the results compared.
- ! Public consultation is required
- ! A professional team is usually required.



**includes the project as proposed, the no action alternative at least one other real alternative*

PURPOSE OF AN EA

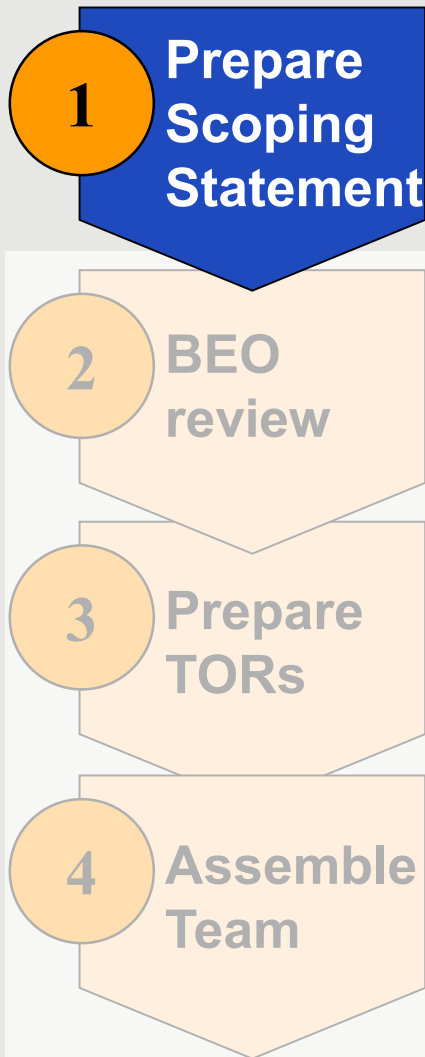
Better-informed decision making via:

- Full-awareness of significant adverse environmental impacts—and beneficial ones
- Consideration of alternatives that achieve purpose and need

Specify mitigation and monitoring actions to reduce adverse impacts of the chosen alternative.



First step in preparing an EA: Scoping



Scoping determines the significant issues, **physical and time boundaries, associated facilities and alternatives to be assessed by the EA.**

The deliverable for the scoping process is the **scoping statement.**

The scoping statement must clearly articulate purpose, need and proposed actions.

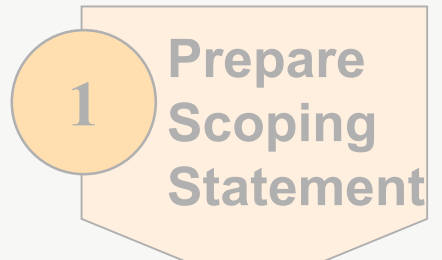
And, per 22 CFR 216.3(a)(4), the statement includes:

- Scope and significance of issues to be analyzed--includes social impacts.
- Issues that do not need to be addressed
- Schedule and format of EA, expertise needed

IF AN IEE HAS BEEN PREPARED, IT IS A KEY INPUT TO THE SCOPING PROCESS.



First steps in preparing an EA



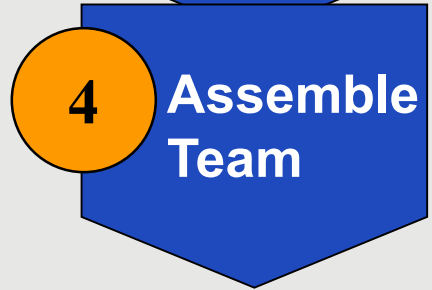
The scoping statement must be approved by the BEO.



STRONGLY RECOMMENDED:
Consult with the REA or BEO before beginning the Scoping process.



Terms of Reference for the EIA team are based on the types of issues and analysis required by the scoping statement



Assemble a team based on the TORs.
Frequently requires contracting with one or more experts, or an EIA consulting firm.

THE EA OUTLINE



Reg. 216 specifies*
that an EA contains:

1. Summary
 2. Purpose
 3. Comparison of alternatives**
 4. Affected Environment
 5. Environmental Consequences
 6. List of Preparers and appendices
- Appendices (as indicated)

* 22CRR 216.6.

** Reg. 216 uses the term:

“Alternatives Including the Proposed Action”

COORDINATION WITH HOST COUNTRY EIA PROCEDURES

1

The large majority of host countries now have EIA policies and procedures

&

2

Most projects that require an EA under Reg. 216 will also require a full EIA under host country procedures

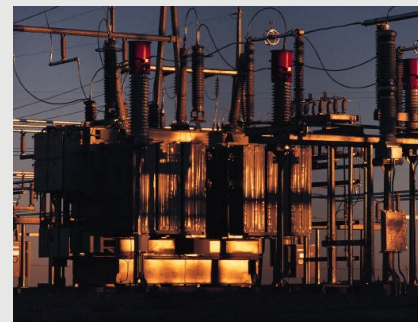
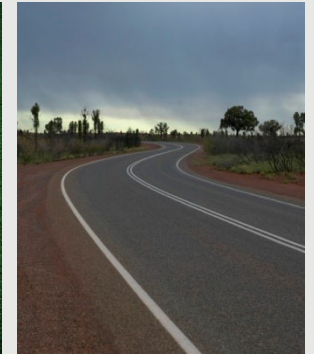
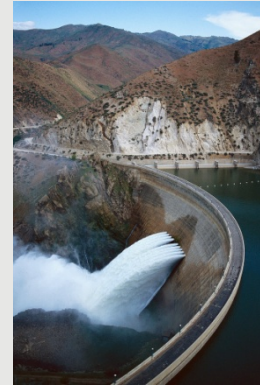
Implications:

- Ideally, make one document to satisfy both USAID & host country requirements
- Requires up-front discussions with host country EIA agency.

Note: Reg. 216 REQUIRES collaboration with host country “to the maximum extent possible” in developing EAs.

UNDER HOST COUNTRY PROCEDURES, EAs ARE TYPICALLY REQUIRED FOR...

- **Larger-scale infrastructure**, e.g. water treatment facilities, dams, power plants and transmission lines; pipelines, roads, landfills, etc.
- **Other large scale programs** with significant total biophysical impact, e.g., large agricultural programs; extensive use of pesticides in public health
- **Large water draws.** Activities resulting in significant withdrawals from fresh water bodies or aquifers
- **Sensitive areas.** Construction or land conversion in protected areas, wetlands, critical habitat.
- **Use of GMOs** (Genetically modified organisms, including crops.)



BEO REQUIREMENTS ADDRESS GAPS IN REG. 216 EA REQUIREMENTS

- Reg. 216 does not
 - Require public consultation
 - Clearly require an EMMP

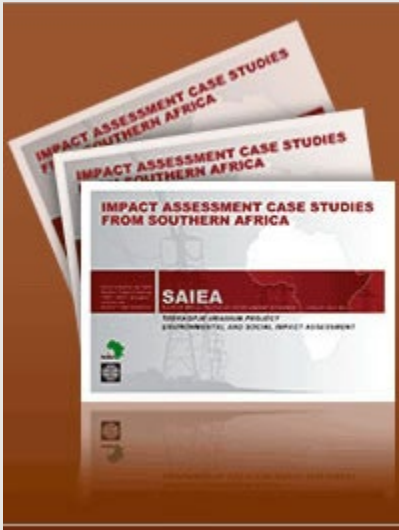


However, both are essential to make the EA effective—and usually required by host country procedures.

- USAID BEOs require these elements of good practice.



TIMING, PROCURING & OVERSEEING EAS



“Good News” EA Case Studies:
Illustrations of the Value of EA in Development

[www.saiea.com/
Case study book 0
9.htm](http://www.saiea.com/Case_study_book_09.htm)

NEED should be identified **NLT PAD stage** & [funds set aside](#)

Procurement options:

1. Undertake scoping internally, and

- Engage independent contractor for EA; or
- Include EA in IP’s SOW

2. Engage independent contractor for scoping and EA

3. Include Scoping + EA in IP’s SOW

(but has drawbacks & restrictions – 22 CFR 216.3(a)(5) requires that the EA be completed and cleared prior to activity approval except in special circumstances)

KEEP IN MIND...

EAs can lead to redesign, not just adding mitigations – therefore best to do **BEFORE** the project RFP is issued

2-phase budgeting is required: the SOW for the EA is determined by the scoping process/statement

Activities to be covered by the EA cannot be implemented until EA is completed and approved.

Like all 22 CFR 216 documents, project design lead has responsibility for EA completion & approval (activity manager or COR/AOR if assigned)

USAID takes full ownership of EAs once approved: **they are USAID documents, not the contractor's.**

For EAs also submitted to host countries authorities: firm registration; fees; substantial involvement in EA by a local firm often required.

