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INITIAL ENVIRONMENTAL EXAMINATION

Office of Afghanistan & Pakistan Affairs (OAPA)

PROGRAM/ACTIVITY DATA

Country Code: 306
Strategic Objective Name: A Thriving Economy Led by the Private Sector
Program Objective: To improve production and productivity for wheat, targeted high value crops, and livestock, resulting in improved food security and livelihoods, as well as economic regeneration and sustainable development for rural Afghans.
Country or Region: Afghanistan
Program Area: 4.5 Agriculture
Program Element: 4.5.2 Agricultural Sector Capacity
Type of Contract/IP: Contract/TBD
Activity Name: Regional Agricultural Development Programs (N,S,SW,W)

Funding Begin: 05/31/2012 (est) **Funding End:** 05/30/2017 (est) **LOP Amount:** \$295,000,000
IEE Prepared by: Stephen Gudz, Senior Agricultural Advisor **Date:** 01/01/12
Reviewed by: Mumtaz A. Ahmadi, MEO, USAID/Afghanistan

IEE Amendment (Y/N): N

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion	[X]	Deferral	[]
Positive Determination	[]	Negative Determination	[]
Negative Determination With Conditions	[X]	Exemption	[]

SUMMARY OF FINDINGS:

I. Background

Three decades of conflict in Afghanistan have caused agricultural production to decline 3.5 percent annually between 1978 and 2004. Institutional capacities are improving, but remain weak while significant investment occurred in transportation, security, communication, and complementary investment in irrigation infrastructure is required to help farmers and agribusinesses take advantage of these developments. Significant drought and environmental degradation through deforestation and overgrazing of rangelands have reduced productivity of crops and livestock and require improved resource management. Inadequate commercial financing limits farm and agribusiness growth and technical assistance is required to improve the credit worthiness of prospective borrowers. High levels of population growth and a weak land-titling system has led to the fragmentation and inadequate clarity

of land tenure. A dearth of adequately trained agricultural staff contributes to poor agricultural yields and dependence on subsistence agriculture. The ability to find solutions to these challenges will determine future agricultural and economic growth and stability of Afghanistan.

The objective of the Regional Agricultural Development Program (RADP) is to increase production and productivity for wheat, targeted high value crops, and livestock, resulting in improved food security and livelihoods, as well as economic regeneration and sustainable development for rural Afghans. The program will comprise regional programs operating in the South, Southwest, West and North over five years through four separate contracts, with a budget of \$295 million. The sustainable agricultural development program also will support the strengthening of licit economies to fuel economic growth, provide alternatives to poppy cultivation, and help stabilize insecure areas. The respective regional programs will take advantage of previous donor-funded programs and the improving infrastructure within economic growth corridors to develop profitable agricultural value chains through increasing the productivity of farmers, strengthening agribusinesses and supporting an improved enabling environment.

Activities

RADP is designed to draw on past and current program lessons learned and best practices, as well as farm community assets such as farmer associations, existing private sector entities, and ongoing relationships and capacity building efforts of Provincial-level Departments of Agriculture, Irrigation and Livestock (DAIL). Lessons learned from previous, similar projects, i.e., ASAP, CHAMP, ACE, IDEA-NEW, will be applied carefully during the project implementation. Best practices, such as environmentally sound designs, proper application of fertilizers, seeds, and pesticides will be followed in consultation with the Mission Environment Officer (MEO), keeping in mind host-country environmental regulations and laws.

The RADP will address challenges to development of the agriculture sector in Afghanistan through the following:

- Provision of improved technology and cultivation practices to increase wheat productivity and food security and free additional resources for production of high value crops;
- Demonstration of more effective cultivation and post-harvest handling techniques to increase production and quality of high-value crops for domestic and export;
- Support and training for private sector entities to increase their capacity to add value to raw crops and increase economic value of agricultural products; and
- Inclusion of rapid-response programming mechanisms to maintain flexibility in changing implementation environments.

Expected Results

Activities under each component of the program will be designed to meet the following goals:

- Increased agricultural sector productivity in target regions;
- Increased commercial viability of small and medium farms and agri-businesses;
- Improved economic stability in targeted, insecure areas;

- Support for counter-narcotic objectives through the development and sustainment of Afghan led programs seeking to reduce poppy cultivation;
- Substitution of imported commodities and increased regional exports;
- Increased food security in targeted farmer households and communities; and
- Improved delivery of agriculture-related public services at the sub-national levels.

An underlying goal of all of the above is to increase economic growth and create employment. The final Performance Management Plan (PMP) will be finalized with each of the respective contracted partners within the first 90 days of the respective contract.

Purpose of the IEE

This IEE is the first prepared for the proposed activities of RADP. In the event circumstances or activities change, an amendment to the approved IEE will be prepared.

Socio-Environmental Situation

Afghanistan is located in Central Asia, north and west of Pakistan, and east of Iran. Afghanistan's economy has improved significantly since the fall of the Taliban regime in 2001 largely because of the infusion of international assistance, the recovery of the agricultural sector, and service-sector growth. Despite the progress of the past few years, Afghanistan is extremely poor, and highly dependent on foreign aid, agriculture, and trade with neighboring countries. Much of the population continues to suffer from shortages of housing, clean water, electricity, medical care, and jobs. Insecurity and the Afghan government's inability to extend rule of law to all parts of the country pose challenges to future economic growth.

Degradation of the environment and depletion of natural resources also are significant, including visual consequences of the long period of instability, such as depletion of forest cover by 66.5 percent in the south-eastern part of the country over the last 30 years. Wood still is the main source of energy for over 90 percent of households (Afghanistan Statistical Yearbook, 2007). The Afghan government, the United States, and international donors are committed to improving access to basic necessities by prioritizing infrastructure development, education, housing development, jobs programs, and economic reform. Reconstruction projects include national and provincial road construction, water management studies and alternative power initiatives, such as micro-hydro power stations (USACE-AED 2007).

In June 2009 NEPA issued the first Afghanistan list of the protected species which included 46 species. Afghanistan is a party of International agreements for Biodiversity, Climate Change, Desertification, Endangered Species, Environmental Modification, Marine Dumping, Ozone Layer Depletion. The country also signed the agreement for Hazardous Waste, is still not ratified.

Institutional and Regulatory Framework

Several legal and institutional reforms underway over the last several years have direct implications for the management of water to optimize Afghanistan's agricultural development.

Regulatory Framework

Most critically, a new Water Law was promulgated in 2009 that lays out a model for managing the nation's water resources following the principles of Integrated Water Resources Management (IWRM). The law calls for a nested governance structure for water resources decision-making, including participatory models of community-based management through Water User Associations (WUAs) and Irrigation Associations (IAs), operating within a decision-making framework of River Basin Authorities (RBAs) and River Basin Councils (RBCs) formed in the five major river basins and 41 sub-basins of the country. It sets out requirements for sustainable water allocation and use, and establishes sanctions and penalties for noncompliance.

Perhaps most important, the law defines the roles and responsibilities for Ministries regarding water management as discussed below, which have significant and direct implications for agricultural water use. To operationalize the numerous principles and requirements expressed in these laws, specific regulations are under development by the Ministry of Energy and Water (MEW), and are expected to be reviewed and approved during 2011. In addition, draft procedures for WUAs and IAs have already been submitted to the Supreme Council on Water for review and adoption. The Ministry of Agriculture, Irrigation and Livestock (MAIL) also is expected to start drafting specific regulations for the 2009 water law in the near future.

The Forests Law, under direct authority of MAIL, makes specific references to water resources in defining its purpose, particularly as it relates to protecting ecosystem services provided by forested upper watersheds, including limiting soil erosion, and regulation of surface water and groundwater quality and quantity, and even makes reference to 'irrigated and non-irrigated' forests in its classification of forest types. The Law does not, however, provide any specific details or requirements regarding either the management of water resources in and around forests including for tree crop production, or specific watershed protection measures.

Finally, each of the above legal reforms calls for creating local community-based governance structures of some kind, for example Forestry Associations or Natural Resources Management Associations. It is not clear, however, how each of these entities will be linked to and work with the water-related local governance units called for in the Water Law, i.e., IAs and WUAs, much less sub-basin and RBAs/RBCs.

NEPA is the lead regulatory environmental agency for Afghanistan. In the area of water-resources management, NEPA is responsible for the protection and control of surface water pollution and for the monitoring of surface water quality in cooperation with MAIL, MEW, Ministry of Urban Development (MUD), Ministry of Rural Rehabilitation and Development (MRRD), Ministry of Public Health (MPH), and Ministry of Mines (MOM). With respect to agricultural surface water, the references to water pollution control cited in the law pertain largely to point sources of contamination and do not specifically refer to the non-point source pollution normally associated with agricultural activity, either agrochemical or sediment. That being said, to fulfill inter-institutional coordination, the Committee for Environmental Coordination was created, with a sub-national committee in each province.

In accordance with provisions of the 2007 Environmental law, the National Environmental Protection Agency (NEPA) issued the Environmental Impact Assessment Regulations. At the regional/local level, as mentioned above, a structure of multiple scales of governance based at the river basin, sub-basin, and

micro-catchment/community level is proposed. Some donors have been working with GIRoA for several years to lay the groundwork for a decentralized governance regime based on these hydrologic boundaries (even prior to passage of the Water Law). It remains theoretical at this juncture, in part awaiting the finalization and approval of the detailed regulatory regime.

II. Evaluation of Project/program Issues with Respect to Potential Environmental and Social Impact

Types of activities in the above-mentioned situations are farm community and private sector level training and provision of inputs to improve cultivation and value added practices. Some activities qualify for *Categorical Exclusion*, as per 22 CFR 216.2 (c)(2), which states that certain classes of actions are not subject to an Initial Environmental Examination. Technical assistance and training programs, workshops and meetings, and document and information transfers are included in the list of actions not subject to 22 CFR 216.3 because they do not have a direct effect on the natural or physical environment. As such, where appropriate the implementing awardee will be responsible for internal management of the environmental document and shall include a file which states that a designated activity met the definition for Categorical Exclusion.

Other activities in the RADP scope qualify for a *Negative Determination with Conditions*. These include acquiring commodities and agricultural inputs, improving small and medium scale irrigation systems, limited support for equipment purchase and use, training for more effective processing, and livestock management and monitoring activities. These activities are subject to mitigation and monitoring conditions set forth below. Pursuant to 22 CFR 216.3 (a)(2), this IEE will be forwarded to the BEO.

III. Proposed Activities and Recommended Threshold Decisions & Mitigation Actions (Including Monitoring and Mitigation Measures).

Table 1: Threshold Determinations

Activities	Effects on natural or physical environment	Recommended Threshold Determination
1. All Program activities that do not effect the natural or physical environment. This includes: technical assistance, participant training, except to the extent such programs include activities directly affecting the environment (such as construction of facilities, assistance in use of crop protection products, etc.), consultations, document transfers and information dissemination, analysis, and	No effect	<i>Categorical Exclusion</i> , no actions required

<p>workshops.</p> <p>Specifically, this might include:</p> <ul style="list-style-type: none"> • Farmer and farmer group training at farmer field schools; • Farmer-to farmer visits to share good practices; • Preparation of farmer and agribusiness needs assessments, action plans, and reports; • Provision of consulting and extension services for farmers and agribusinesses; • Training and support for Ministry of Agriculture, Irrigation and Livestock (MAIL) counterparts at the regional and provincial level; • Improve small to medium business practices and competitiveness for agricultural sector business; • Promotion of gender equality to account for gender roles and relationships; • Gender analysis to guide Program implementation and integration of women throughout agricultural value chains; and • Sharing of market information; • Linking farmers and enterprises to markets; and • Public education. 		
<p>2. All activities for which no significant adverse effects are expected, no special mitigation measures are needed, or activities are implemented with conditions:</p> <ul style="list-style-type: none"> • Procurement of equipment, commodities, and materials for implementing program activities. 	<p>Insignificant effect</p>	<p><i>Negative Determination with Conditions:</i></p> <p>The Implementer is required to ensure that equipment, commodities (also see ADS 312), and materials are procured from certified retailers; environmental safety and quality certificates conforming with national and/or</p>

		<p>international standards are available; equipment and materials are used in an environmentally sound and safe manner, properly disposed of when applicable at the end of their useful life in a manner consistent with Afghanistan laws, best management practices according to USG, European Union or equivalent standards.</p>
<p>3. Small-scale activities, technical assistance and procurement of services and commodities that normally do not have a significant effect on the environment, such as, for example:</p> <ul style="list-style-type: none"> • Technical advice and support for rehabilitation and management of small scale irrigation systems and on-farm water management demonstration plots (for small scale farmers generally managing one to three hectares); • Perennial tree crop management utilizing irrigation (for small scale farmers generally managing one to three hectares); • Support for mechanized cultivation (for small scale farmers generally managing two to ten hectares); • Matching grants or links to finance mechanisms for purchase of required equipment for cultivation, processing, or marketing of crops to encourage value chain development; and • Procurement of agricultural inputs (Seeds, seedling, and other plant materials, fertilizer, pesticides), equipment and machinery, technologies, materials, services that may have a potential for hazardous environmental impact. 	<p>Potential for minor to moderate adverse environmental effects of one or more activities</p>	<p>a) Negative Determination with Conditions: Environmental Due Diligence (EDD) will be required to identify environmental background and potential effects. For site specific activities, Environmental Mitigation and Monitoring Plans (EMMP) will be required to confirm / not confirm a potentially significant adverse effect. If confirmed, the IEE shall be amended to recommend a positive determination. Such a positive threshold decision will trigger commencement of the EA Process and an Environmental Assessment (EA) shall be conducted by the Implementer prior to start of activities. Details for required steps are provided below in the "Recommended Action."</p> <p>b) Negative Determination with Conditions that an existing valid approved Pesticide Evaluation Report and Safe Use Action Plan (PERSUAP) is reviewed, and amended when warranted by the Implementer, and approved by the Bureau Environment Officer (BEO)/OAPA. Genetically</p>

		<p>Modified Organisms (GMOs) will not be introduced. Any non-native species will be introduced in strict adherence to Ministry of Agriculture, Irrigation and Livestock protocols following established biosafety and non-native analysis. In no cases will funding be used to purchase ammonium nitrate and calcium ammonium.</p>
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Recommended Action: *Categorical Exclusion* (approximately 80 percent of funding). Pursuant to 22 CFR 216.2(c)(3), the “core” program activities under all Program’s components (*Section I of Table I*), which include technical assistance, participant training, information dissemination, and other similar environmentally neutral actions, consist of types of interventions entirely within the categories listed in paragraph (c) (2), “Categorical Exclusions,” of Section 216.2, “Applicability of Procedures,” of Title 22 CFR Part 216, “AID Environmental Procedures,” and, therefore, are excluded categorically from any further environmental review requirements. The originator of the proposed action has further determined the proposed activities are fully within the following classes of actions:

- Education, technical assistance, or training programs except to the extent such program includes activities directly affecting the environment (such as construction of facilities, etc.) 22 CFR 216.2(c)(2)(i);
- Analyses, studies, academic or research workshops and meetings 22 CFR 216.2(c)(2)(iii);
- Document and information transfers 22 CFR 216.2(c)(2)(v); and
- Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.) 22 CFR 216.2(c)(2)(xiv).

Recommended Action: *Negative Determination with Conditions* (approximately 10 percent of all funding) for activities for which no significant adverse effects are expected and no special mitigation measures are needed. (*Section II of Table I*). These activities include the procurement of computers and other electric and electronic equipment, and materials (under all components). The Implementer should provide evidence that the equipment and materials are procured from certified retailers; environmental safety and quality certificates conforming with national and international standards are available; equipment and materials are used in an environmentally sound and safe manner, properly disposed of when applicable at the end of their useful lives in manners consistent with best management practices, according to USG, European Union or equivalent standards.

Recommended Action: *Negative Determination with Conditions* (approximately 10 percent of all funding) applies for activities that have a potential for an adverse impact on the natural or physical

environment. The originator of the action has determined that pursuant to 22 CFR 216.2(d)(2), rehabilitation of small irrigation facilities may have the potential for minor adverse environmental impacts. For this activity, the Implementer will complete an Environmental Due Diligence (EDD) checklist review to document existing environmental concerns. Foreseeable environmental effects resulting from the activity will require development of an Environmental Mitigation and Monitoring Plan (EMMP). This EDD and EMMP will then be approved by the Contracting Officer's Technical Representative (COTR) and MEO, in consultation with the Regional Environmental Officer (REO) for Office of Afghanistan and Pakistan Affairs (OAPA), and will be adapted to a specific site before the activity implementation as described in Section "Implementer Procedures". The Standard Conditions List in *Annex 1* of this IEE, as well as other guidelines discussed below, may be used as a guide in developing EMMP.

If the EDD results in a finding in which significant adverse effects are confirmed, an environmental assessment (EA) will be conducted. This assessment will include the following steps: 1) SOW for Scoping should be approved by the BEO/OAPA; 2) public consultation should take place at Scoping; 3) the Scoping Statement may result in (a) confirming potentially significant adverse environmental and social impacts and, thus, the SS shall have a SOW for the EA and must be approved by the BEO/OAPA; or in finding (b) no potentially significant adverse environmental and social impacts are expected, in which case, the Positive Threshold Decision would be reversed and an EMMP prepared; 4) the draft EA report is prepared if required and public consultation is conducted, 5) EA Report with EMMP must be approved by the BEO/OAPA.

In addition, a valid existing PERSUAP will be reviewed and amended, if warranted, for any activity involving assistance in the procurement or use of pesticides, including crop protection trainings. **Note** activities affected may not go forward until the PERSUAP is prepared by a BEO/OAPA approved professional and approved by the BEO/OAPA. In no cases will funding be used to purchase ammonium nitrate and calcium ammonium.

Conditions

In addition to the procedures detailed above, the Implementer will do the following:

1. The implementing partner will screen all sub-projects using an environmental review system approved by USAID/Afghanistan and contained in Annex 1. The environmental review form shall include the following: a) description of proposed activities to be funded, b) potential negative environmental impacts of proposed activities, c) identification of specific mitigation measures to address each potential environmental impact, and d) a plan to monitor the implementation of mitigation measures adjustments to avoid negative environmental impacts.
2. The implementing partner shall avoid using equipments and inputs that generate significant waste streams, consume significant energy and water resources, or otherwise directly affect the environment.
3. The implementing partner shall provide training to its staff on best management practices.
4. Community sub-projects will be identified in consultation with local community development councils (CDC), District Development Assemblies (DDAs) and/or other village Shuras/councils.

5. Emphasis will be place on providing opportunities for both men and women “gender equity.”
6. All activities will be implemented in accordance with best practice guidance provided in the Asia environmental guidelines at www.usaid.gov/our_work/environment/compliance/ane/guidelines.htm; Environmental Guidelines for Small Scale Activities in Africa, 2nd edition as provided at <http://www.encapafrika.org>; IFC *Environmental, Health and Safety Guidelines* as provided at: <http://www.ifc.org/ifcext/sustainability.nsf/Content/EnvironmentalGuidelines> and World Bank *1999 Pollution Prevention and Abatement Handbook* as provided at http://www-wds.worldbank.org/external/default/main?pagePK=64193027&piPK=64187937&theSitePK=523679&menuPK=64187510&searchMenuPK=64187283&siteName=WDS&entityID=000094946_99040905052283; EBRD Sub-sectoral Environmental and Social Guidelines (<http://www.ebrd.com/about/policies/enviro/sectoral/>); ADB Environmental Guidelines (<http://www.adb.org/Water/CFWS/Roadmap-Sectoral-Guidelines.pdf>); World Bank Environmental Assessment Handbook and Updates (<http://web.worldbank.org/WBSITE/EXTERNAL/TOPICS/ENVIRONMENT/EXTENVASS/0,,contentMDK:20282864~pagePK:148956~piPK:216618~theSitePK:407988,00.html>)
7. The implementing partner will have adequate funds to implement any environmental mitigation and monitoring measures necessary.
8. The implementing partner will include environment compliance considerations into all aspects of the project implementation and will promote and train local counterparts on environmental requirements and standards across all of the project’s activities; such proposed activities will be included in annual work plans, and results will be reported in annual reports.

Resource Allocation, Training and Reporting requirements

The contract with the Implementer shall require compliance with all conditions of this IEE. The implementer shall be responsible for training its staff, subcontractors, and counterparts on the contract’s environmental requirements and for ensuring their compliance with these requirements.

The Implementer shall have sufficient permanent staff with expertise in environmental compliance to implement and report on the expected scope of environmental compliance work. The Implementer shall document, using photos, schemes and maps, the status of environmental (and social) conditions on site and in the area of influence prior to, during and after implementation of projects and activities. This evidence also may be used for providing USAID with lessons learned and best practice.

The Mission will provide for environmental training for the Implementer(s) by the REO and/or the USAID/Afghanistan MEO prior to the start of the activity implementation.

The Implementer shall have the following documentation and reporting requirements associated with the environmental compliance:

- Annual Work Plans shall have a section on the planned activities related to environmental compliance.

- EMMP, EA, and EDD reports, as described above, will be developed by the Implementer and approved by USAID prior to the launch of each activity having a potential adverse impact on physical and natural environment.
- Progress Reports will have a section on the status of activities related to environmental compliance and results, including project summaries along with environmental impacts, success or failure of mitigation measures being implemented, results of environmental monitoring, and any major modifications/revisions to the project.
- The Implementer's annual report shall include an annex containing a table indicating the status of mitigation measures and monitoring results, when applicable.
- Final Report will have a section summarizing program activities related to environmental compliance and will describe results, including information on any positive or negative environmental effects of program activities.
- Site specific Mitigation and Monitoring Reports will be submitted to USAID at the completion of each relevant activity at every affected project site, and not on an annual basis. Reporting will include photographic documentation and site visit reports which fully document that all proposed mitigation procedures were followed throughout implementation of the subject work including quantification of mitigation. All such reports and documentation will be submitted to the COTR and MEO.

Limitations of the IEE

This IEE does not cover activities involving the following:

- Activities involving support to wood-processing, agro-processing, industrial enterprises, and regulatory permitting. The EA will be reviewed and approved by the Bureau Environmental Officer prior to start of activities.
- 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 OAPA BEO.
- DCA or GDA programs.
- Procurement or use of Asbestos Containing Materials (ACM) (e.g., piping, roofing), PCB-containing transformers, or other hazardous materials for construction projects.

Any of these actions would require an amendment to the IEE duly approved by the BEO/OAPA.

Revisions

Pursuant to 22 CFR 216.3(a)(9), if new information becomes available indicating activities to be funded by the Project might be "major" and the Program's effect "significant," this determination will be reviewed and revised by the originator of the project and submitted to the Asia Bureau Environmental Officer for approval and, if appropriate, an environmental assessment will be prepared.

Annex 1: Standard Conditions for Small-Scale Construction

(May be used as one of the guidance documents to develop site specific Mitigation and Monitoring Plan, i.e., M&M Plan)

Small-scale construction activities occur in association with a wide variety of development projects financed by USAID. Construction activities include demolition, site clearing, soil grading, leveling and compaction; excavation; pipe and equipment installation; and the erection of physical structures. These activities have the potential to result in significant adverse environmental impacts but most of those impacts can be mitigated to acceptable levels through the use of good construction management practices.

These standard conditions have been developed by USAID's Europe and Eurasia Bureau to ensure small-scale construction activities do not result in significant adverse environmental impact. When adherence to these conditions is required as a condition of small-scale construction contracts, no significant adverse environmental impact is presumed to result from activity implementation. Project officers, COTR, Mission Environmental Officers, Contract Officers and implementing organizations must, nonetheless, be aware that these standard conditions are generic and additional potentially significant adverse environmental impacts may be associated with small-scale construction activities. *It is the responsibility of the individual USAID missions, and their implementing contractors and grantees, to monitor construction, to ensure significant adverse environmental impacts do not result from these programs.*

For the purposes of this guidance, "small-scale" construction activities are defined here as those that cost less than \$100,000 per construction project. Given the exceptionally diverse physical conditions under which Bureau construction activities take place and the very broad kinds of construction, the following standard conditions are to be followed "as practicable and appropriate."

Standard Conditions for Small-Scale Construction Projects:

- Establish and adhere to construction timetables that minimize disruption to the normal activities of the construction area.
- Coordinate truck and other construction activity to minimize noise, traffic disruption and dust.
- Develop and implement appropriate human health and worker safety measures during construction.
- Post construction timetables and traffic diversion schedules at the project site.
- Where significant environmental impacts may occur, document and photograph pre-construction and post-construction conditions.
- Avoid subsidence and building stabilization problems through proper foundation excavation, fill placement and borrow-pit management.
- Fill should avoid pockets of segregated materials, should use well-graded materials, and should be compacted to recognized standards.
- Backfill and/or restore borrow areas and quarries before abandonment, unless alternative uses for those sites are planned.
- Control runoff into borrow pits.
- Provide temporary sanitation at the construction site.
- Recover and replant topsoil and plants as practicable.
- Set protocols for vehicle maintenance to control contamination by grease, oil and fuels.

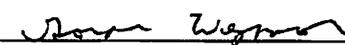
- Install temporary erosion control and sediment retention measures when permanent ones either are not feasible or are delayed.
- Avoid pollution of waterways with stockpiled construction materials.
- Cover stockpiled construction materials, as practicable.
- Place solvents, lubricants, oils, and other semi-hazardous and hazardous liquids over a lined area with appropriate secondary containment to contain spillage. Test the integrity of bulk storage tanks and drums, and secure valves on oil and fuel supplies.
- Build appropriate containment structures around bulk storage tanks and materials stores to prevent spillage entering watercourses.
- Handle, store, use and process branded materials in accordance with manufacturer's instructions and recommendations.
- Take waste materials to appropriate, designated local disposal areas.
- Avoid the use of cement; paper; board; sealant and glazing formulations; piping; roofing material; or other materials containing asbestos.
- Do not use PCBs in electric transformers.
- Avoid sealant and glazing formulations that use lead as a drying agent.
- Use lead-free paint, primers, varnishes and stains.
- Minimize the use of solvent-based paints, or replace with water-based materials.
- Minimize burning of waste materials.
- Employ techniques to minimize dust and vapor emissions as practicable, e.g., road speed limits, air extraction equipment, scaffolding covers, road spray.
- Recycle wastewater to the extent practicable.
- Build tanks or other separators for silt-laden material prior to allowing significant outflow into watercourses.
- Build collection channels leading to oil and silt traps, particularly around areas used for vehicle washing or fuelling.
- Seal or remove abandoned drains to minimize water contamination.
- Segregate waste which can be salvaged, re-used or recycled.
- Introduce measures to control and minimize the volume of waste on site.
- Employ sensitive strategies with regard to trees, watercourses, plant or animal species or habitats, and important historical and archaeological features.
- As practicable, landscape construction sites appropriate by local conditions.
- Minimize the disturbance of, and reduce the spread of, ground contaminants.
- Do not build structures in sensitive areas, such as wetlands.
- If waste will be buried on site, avoid siting burial pits up-gradient from drinking water sources such as wells. Pits should be lined with impermeable material, e.g., clay or polyethylene.
- If waste will be buried on site, avoid siting waste pits where water tables are high or underlying geology makes contamination of groundwater likely. If no alternative site is available, ensure that pits are lined with impermeable material.
- Provide for the safe disposal of gray water from bathing and washing.

Additional Conditions to Minimize Impact of Parking Facility Construction

- Compact substrate materials appropriately.
- Where applicable, apply sealant at earliest possible time to limit runoff from unsealed asphalt.
- Provide adequate drainage for the surface area to be paved.
- Return unpaved areas to original or improved contours following construction.
- Re-vegetate areas where vegetation was removed or destroyed during construction.
- Provide vegetation strips within parking lot where possible, including shade trees.
- Retain tree(s) along parking facility and adjacent roadsides.

USAID APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCES:

Activity Manager/Office of Agriculture	<u>Cleared</u> Stephen Gudz	<u>Jan 2, 2012</u> Date
Acting Director Office of Agriculture	<u>Cleared</u> Dana Stinson	<u>Jan 2, 2012</u> Date
Mission Environmental Officer	<u>Cleared</u> Mumtaz A. Ahmadi	<u>Jan 2, 2012</u> Date
Mission Regional Legal Advisor	<u>Cleared</u> Mark Kerr	<u>Feb 1, 2012</u> Date
Regional Environmental Officer	<u>Cleared by email</u> Andrei Barannik	<u>Jan 2, 2012</u> Date
Executive Secretary	<u>Cleared</u> Phil Clark	<u>Feb 4, 2012</u> Date
Deputy Director	<u>Cleared</u> Jeff Ashley	<u>Feb 4, 2012</u> Date
Mission Director	<u>Cleared</u> Ken Yamashita	<u>Feb 4, 2012</u> Date
Bureau Environmental Officer Approval:	<u></u> Gordon Weynand	<u>2/7/12</u> Date

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