



# USAID Environmental Assessment under Regulation 216

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GEMS Environmental Compliance-  
ESDM Training Series

Ghana ▪ January, 2017

## SESSION OBJECTIVES

- I. Identify when a full Environmental Assessment (EA) is required
- II. Define the different kinds of EAs under USAID Reg. 216
- III. Review the steps for preparing an EA



# FROM YESTERDAY: THRESHOLD DETERMINATIONS THAT RESULT FROM AN IEE

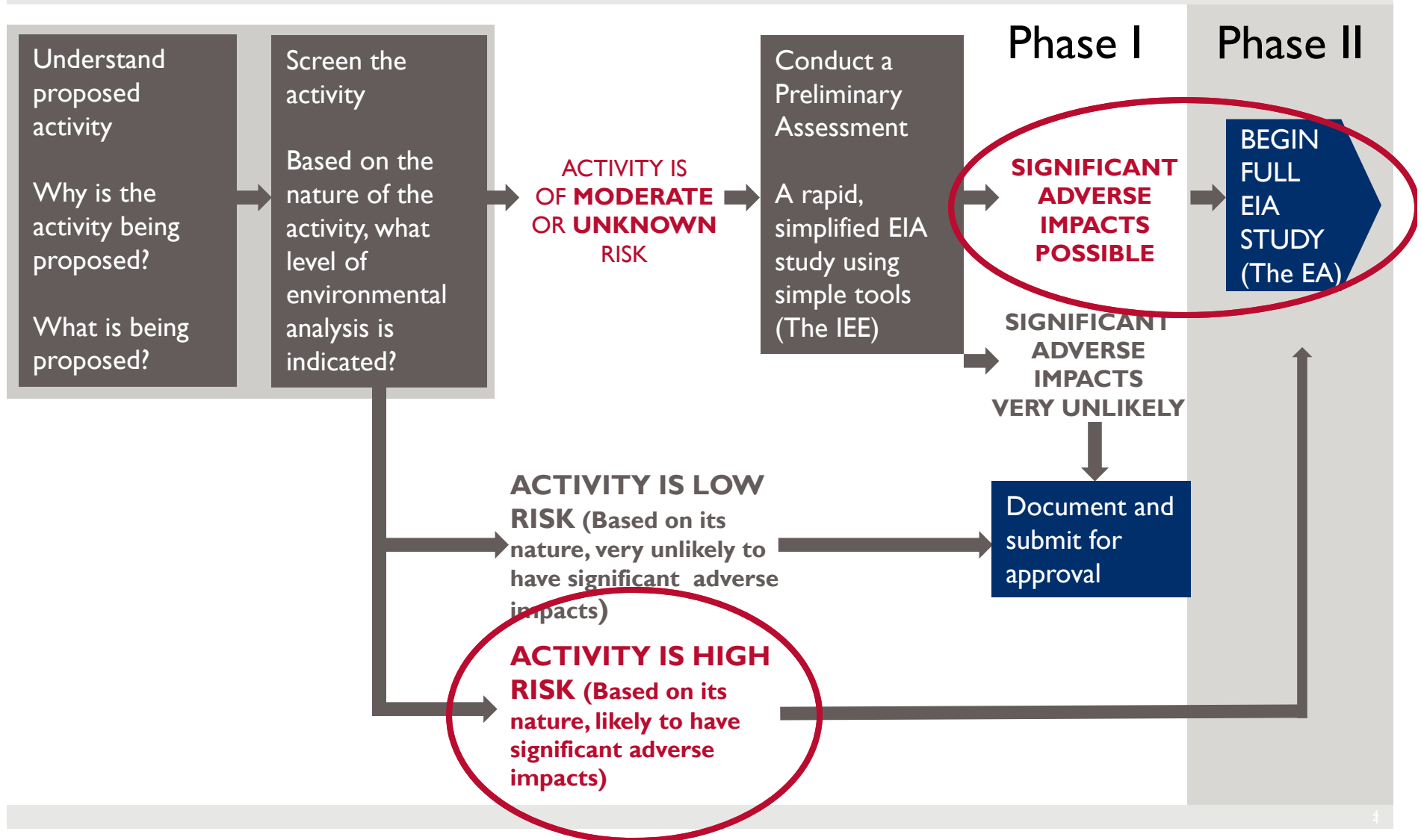
FOR **EACH** ACTIVITY ADDRESSED, THE IEE MAKES ONE OF 4 RECOMMENDATIONS REGARDING ITS POSSIBLE IMPACTS:

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

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

# REMEMBER THIS SLIDE?

## USAID'S IMPLEMENTATION OF GENERAL EIA PROCESS



# DEFINITIONS

## **Environmental Assessment (EA):**

A detailed study of the reasonably foreseeable significant effects, both positive and adverse, of a proposed action on the environment of a foreign country or countries.

**Environmental Impact Statements (EIS):** EIS is similar to EA, but with potential impacts on the US or global environment. Typically not done at USAID.

## WHEN IS A FULL EA NEEDED?

1

- During PAD development, if/when the team proposes activities which fall into the high risk category

2

- When an IEE indicates that significant adverse impacts are possible (a positive determination)

3

- When a sub-project review form (e.g., ERF/R) indicates an activity is high risk

# TYPICAL “POSITIVE DETERMINATION” ACTIVITIES

## 216.2 (d) Classes of Actions Normally Having a significant Effect on the Environment – EA automatic

- River basin development
- Large (>100 ha) irrigation or water management projects (including dams)
- Agriculture land leveling
- Drainage projects
- Large scale agricultural mechanization
- New land development
- Resettlement projects
- Construction of new roads
- Power plants, industrial plants
- Sewage and potable water projects
- Forest harvesting





# TYPES OF USAID EAs

## The Environmental Assessment (EA)

Used to assess the environmental effects of a specific project or action, e.g.

- An EA to assess a single dam or irrigation project
- An EA to assess impacts of a gas or oil pipeline

## Programmatic Environmental Assessment (PEA)

Used to assess the environmental effects of a **class of similar actions**, e.g.,

- Dams, irrigation projects and related water resource development,
- Sustainable forest management plans

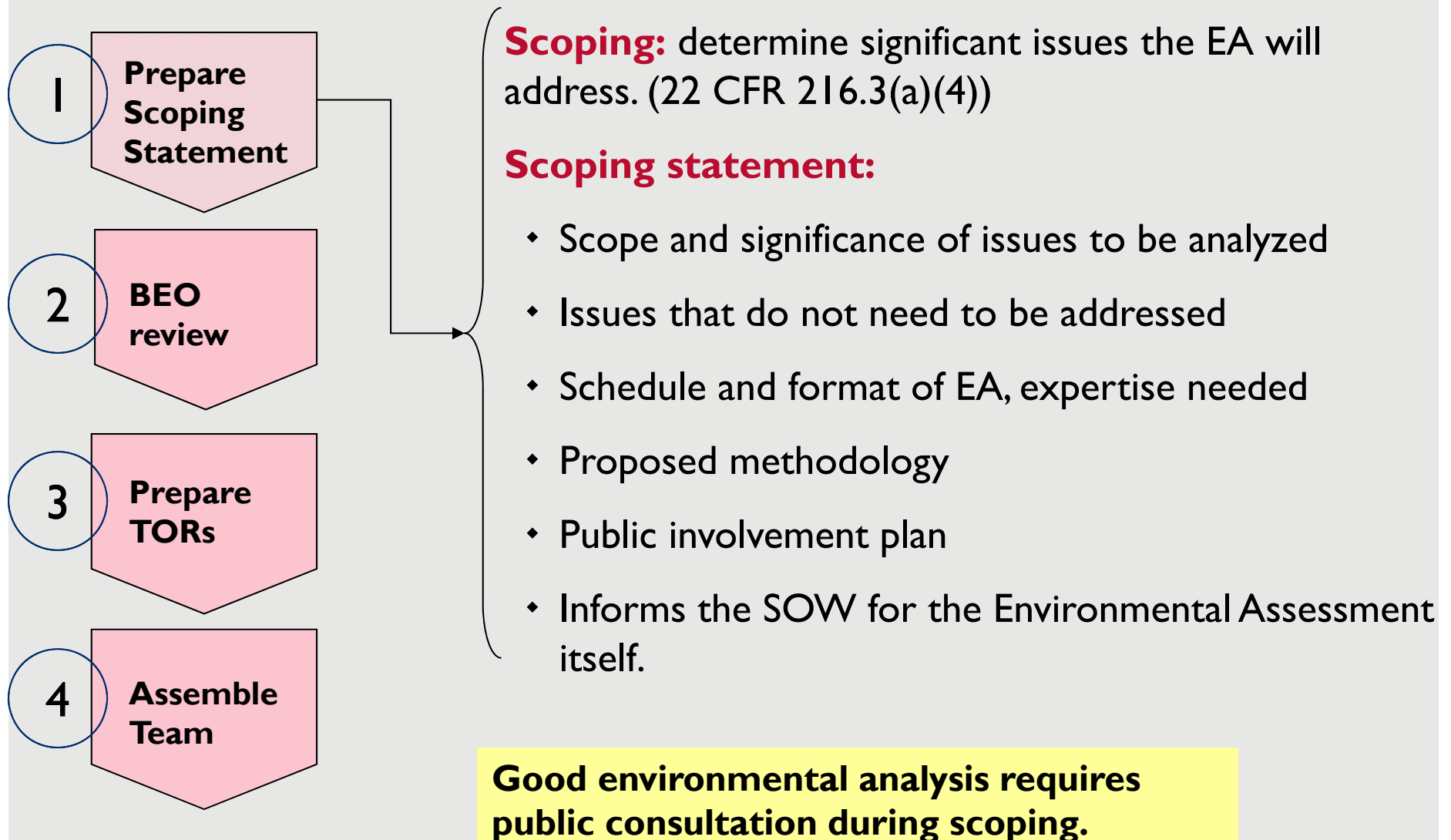
## Rapid Environmental Assessment (REA)

Used to assess, define and prioritize potential environmental impacts **in humanitarian assistance situations**, e.g.,

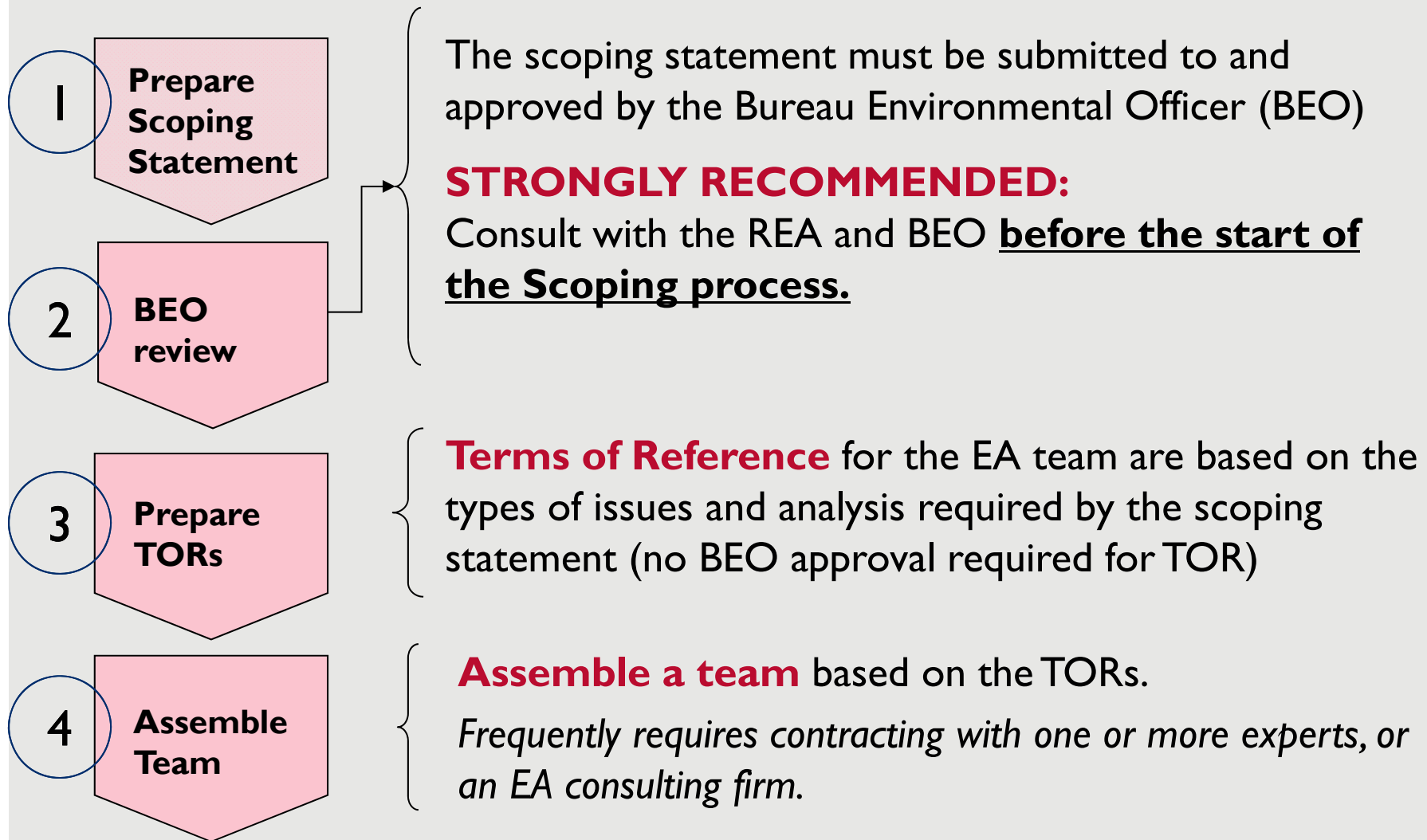
- Earthquake
- Flood
- Tsunami
- Landslide



# FIRST STEP IN PREPARING AN EA: SCOPING PROCESS



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# SCOPING STATEMENT VS EA CONTENT

SCOPING



EA

- ID impacts requiring further investigation
- Possible alternative actions
- Preliminary baseline information
- Preliminary methodology for the EA
- Consultations
- Timeline, expertise, and approach for the EA

- Scope of the assessment
- Stakeholder engagement process
- Describes & evaluates the baseline situation
- Purpose & Need for the proposed actions
- Describe existing conditions
- Identify & analyze alternatives
- Identify & characterize potential impacts of the proposed activity
- Develop a mitigation and monitoring plan
- Communicate and document the evaluation process

# DEFINING ISSUES VIA SCOPING

- An **issue** is derived from specific activities described under the Proposed Action.
- The issue should be phrased as a cause-effect statement relating to actions under consideration
- An issue statement should describe a specific action (cause) and the potential environmental impact(s) arising from that action (effect)
- Any issues eliminated from further analysis should be documented in the Scoping Statement as “issues considered, but dismissed, and why.”

# STAKEHOLDER ENGAGEMENT

- Goal: to communicate and inform in an inclusive manner and gather information from stakeholders
- Important for engaging the individuals, groups, and communities that may be affected by the proposed action
- Should be commensurate with the scale of the project
- Utilize a variety of communication tools, including radio, newspaper, meetings, open forums, websites, letters, phone calls...



# THE EA OUTLINE

Reg. 216 specifies that an EA will contain the following elements:

1. Summary
2. Purpose & Need
3. Affected Environment, Existing Conditions
4. Comparison of Alternatives\*
5. Environmental Consequences
6. *Mitigation & Monitoring Plan*
7. List of Preparers
8. Annexes

\*Reg. 216 uses the term:  
“Alternatives Including the Proposed Action”





# CONTENTS OF THE EA SECTIONS

## I. Summary

Major conclusions

Areas of controversy

Issues still to be resolved.

## 2. Purpose & Need

Describes the **development need** or **objective** that the proposed action is intended to address





# CONTENTS OF THE EA SECTIONS

## 3. Affected Environment

“Succinctly” describe the environment of the area(s) to be affected. Include only a description of the environmental characteristics that may influence or be influenced by the alternatives.

## 4. Comparison of alternatives

Present the alternatives considered

- Includes the no action alternative
- Explain why certain alternatives were not considered
- Each alternative, including the proposed activity, must be considered equally

Compare the environmental impacts of these alternatives

- Comparative summary of the analysis presented in “Environmental Consequences” (Section 5)
- Include mitigation actions not included in proposed action or alternatives
- Identify the preferred alternative



# CONTENTS OF THE EA SECTIONS

## 5. Environmental consequences

Presents the environmental impacts of each alternative

Includes the proposed action and the no action alternative

**Impacts of alternatives are not compared in this section.**

Should include (See 216.6.(c)(5) for full list)

- Any adverse effects and their significance (including those that cannot be avoided)
- Relationship between short-term uses of the environment and maintenance/enhancement of long-term productivity
- Conflicts with other policies, plans or controls for the areas under consideration
- Recommended mitigation measures



# IMPORTANT NOTE

WHEN ASSESSING IMPACTS,  
**TOO MUCH INFORMATION**  
IS AS BAD AS **NOT ENOUGH**

**Provide the most detailed analysis for  
the more significant impacts.**

**Summarize or reference for lesser  
impacts**

*\* See 216.6.(c)(4)*

# CONTENTS OF THE EA SECTIONS

## 6. List of Preparers

**Names and qualifications** of the EA Team

## 7. Annexes

**Annexes** can be useful in organizing the EA so that only the most critical information for decision-making is in the body of the EA

# COORDINATION WITH HOST COUNTRY EA PROCEDURES

Most host countries have EA policies and procedures, USAID must also comply with these requirements

- Most projects that require an EA under Reg. 216 will also require a full EA under host country procedures
- During screening, also screen against host-country categories or criteria.
- If a host-country preliminary assessment or full EIA is required, the objective is to create one document that satisfies both systems.



Collaboration with local Governments can facilitate the environmental analysis process for the Implementing Partners and USAID staff.

## SOME GAPS IN THE REG. 216 EA REQUIREMENTS

- Reg. 216 does not have language requiring a detailed mitigation and monitoring plan (EMMP)
- However, Mitigation and Monitoring Plans are essential to making EAs effective, and are in effect required by USAID.

### Remember!

*Mitigation and Monitoring plans assign responsibilities and establish schedules/time lines and reporting requirements.*

**Questions?**



# Discussion Questions

