OAPA Tracking #: OAPA-11-ANE-PAK-0036

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Initial Environmental Examination, Amendment 2

PROGRAM/ACTIVITY DATA:

Country Code-CO: **391-007**

Country: Pakistan

Objective: Investing in People – Health, Amendment 2

Activities Name: Asia 10-02 Pakistan IEE – ETD, Signed October 23, 2009 for the following activities:

- Infectious Disease Prevention and Control Program (LOP $80 million)
- Improved Child Health Project (ICHP) in FATA (LOP $100 million)
- Pakistan Integrated Primary Health Care (LOP $400 million)

Funding Begins: FY 2009 **Funding Ends**: FY 2018 **LOP Amount:** $580 million

IEE Prepared By: Shanda Steimer **Date:** July 20, 2011

IEE Amendment (Y/N): **Y** If "yes", Filename & date of original IEE ANE 08-69, approved on May 20, 2008

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

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

Background

The current FATA Improved Child Health Project (ICPH), implemented by the U.S. non-governmental organization Save the Children is a five-year effort aimed at stabilizing key militancy-affected regions of FATA that fall under the Government of Pakistan's Sustainable Development Plan for FATA. The Asia Bureau Environmental Officer approved Initial Environmental Examination (IEE) for Improved Health in Vulnerable Populations, Amendment 2 on May 20, 2008 with funding end date of FY 2012 (BEO Tracker # ANE 08-69).

Purpose and Scope of IEE

The purpose of this IEE amendment for Improved Child Health Project in FATA is to duly reflect LOP amount as $26,100,000 and to extend the end date of this activity by sixteen months from FY 2012 to September 30, 2013. The cost-extension is justified by the increased cost of realizing the original project goals. The scope and nature of all activities of the ICPH in FATA

remain the same. All activity-specific determinations, including Categorical Exclusions and Conditions remain in force.

New Information

In accordance with 22 CFR 216.3(a)(9), if new information becomes available which indicates that activities to be funded by the project might be "major" and the project's effect "significant," the Negative Determination with Conditions will be reviewed and revised by the originator of the project and submitted through the MEO to the BEO/OAPA for approval and, if appropriate, an environmental assessment will be prepared.

APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS:

CLEARANCES:

General Development Officer/ FATA	Paul McDermott	8/1/11 Date
Mission Environmental Officer	Andrei Barannik	08/02/2011 Date
Regional Environmental Advisor, Asia & OAPA	Andrei Barannik	08/02/2011 Date
Director, Program Resource Management (PRM)	John Morgan	8/3/11 Date
Deputy Mission Director	Rodger Gamer	8/4/2011 Date
APPROVAL:		
Mission Director	Andrew B. Sisson	8/4/2011 Date
Bureau Environmental Officer, OAPA	Gordon W. Weynand	8/11/11 Date

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Attachment 1

Environmental Mitigation and Monitoring Plan (EMMP)

- An EMMP should either be included in or developed for (1) **all IEEs** that have at least one "Negative Determination with Conditions" (or for activities for which an environmental review has been completed pursuant to an IEE requirement) and (2) all Environmental Assessments (EAs).
- If the EMMP is not developed as part of the IEE, the implementing partner should usually lead development of the EMMP, subject to review and oversight by the MEO and COTR/AOTR.
- In all cases, the tasks identified in the EMMP are incorporated into the implementing partner's Work Plan, budget, and reporting.
- The following EMMP format is recommended. It can be adapted, as necessary.

Environmental Mitigation and Monitoring Plan
Activity Title:
Implementing Partner:

Activity	Mitigation Measure(s)	Monitoring Indicator(s)	Monitoring and Reporting Frequency	Party(ies) Responsible	Indicative Budget
List all activities in IEE that received a "negative determination with conditions." *Do not list any other activities in separate rows.*	If mitigation measures are well-specified in the IEE, quote directly from IEE If they are not well-specified in the IEE, define more specifically here.	Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	For example: "Monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager."	If appropriate, *separately* specify the parties responsible for mitigation, for monitoring and for reporting.	

Attachment 2

Environmental Documentation Form

INSERT PROJECT NAME

A. Applicant information

Contractor/grant ee(organization)	Parent grant or project
individual contact and title	Address, phone and email (if available)
activity (brief description)	Amount
Location of activity	Start and end date of activity

B. Activities, screening results, and recommended determination

TABLE 1	Screening result (Step 3 of instructions)			Recommended Determinations (Step 6 of instructions. Complete for all moderate and high-risk activities)		
Proposed Sub-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 activity contains. . .	*(equivalent regulation 216 terminology)*
☐	Very low risk sub-activities	*categorical exclusion(s)*
☐	After environmental review, sub-activities determined to have **no significant adverse impacts**	*negative determination(s)*
☐	After environmental review, sub-activities determined to have **no significant adverse impacts, given appropriate mitigation and monitoring**	*negative determination(s) with conditions*
☐	After environmental review, sub-activities determined to have **significant adverse impacts**	*positive determination(s)*

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 ensure that the activity complies with environmental requirements established for the **INSERT PROJECT NAME** under the Code of Federal Regulations 22 CFR 216:

- 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 ☐ Approved ☐ Rejected	(print name)	(signature)
USAID MEO or DMEO ☐ Approved ☐ Rejected	(print name)	(signature)

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

Standard Conditions for Small-Scale Construction

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 down to acceptable levels through the use of good construction management practices.

These standard conditions have been developed to ensure that 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, COTRs/AOTRs, activity manager, Mission Environmental Officers, Contract Officers and implementing organizations must nonetheless be aware that these standard conditions are generic in nature, and that additional potentially significant adverse environmental impacts may be associated with small-scale construction activities. ***It is the responsibility of the individual USAID missions, and/or their implementing contractors and grantees, to monitor construction and to ensure that 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. Because of the exceptionally diverse physical conditions under which Bureau construction activities take place and the very broad kinds of construction that take place, 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, it should use well-graded materials, and it 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 in order 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/or 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 in a way that is appropriate to 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.

Standard Conditions for Small-Scale Water and Wastewater Activities

USAID's Bureau for Asia finances, directly or indirectly, a large number of water and wastewater activities. These occur in both rural and urban areas, and in association with residential, commercial, industrial and medical facilities. Water and wastewater activities have the potential to result in significant adverse environmental impacts, but most of those impacts can be mitigated down to acceptable levels through the use of good siting, design, construction, operations and maintenance practices.

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

For the purposes of this guidance, "small-scale" water and wastewater activities are defined as those that cost less than $200,000 per individual construction project. Because of the exceptionally diverse physical, biological and social environments under which Bureau water and wastewater projects take place, and the broad kinds of water and wastewater activities that are financed, these standard conditions are to be followed "as practicable and appropriate."

Standard Conditions for Water and Wastewater Activities

Standard Siting Conditions

- Site water supply facilities in a way that minimizes the potential for contamination, taking into account existing and likely future land use patterns in the water supply—i.e., wellhead protection, or upper watershed—area.
- Site wastewater facilities in a way that minimizes their potential for contaminating water supply sources, or for exposing human populations to water-borne contaminants.
- Avoid siting water supply and wastewater facilities in flood-prone areas.
- Do not site water and wastewater facilities on active faults or other areas where ground stability problems such as soil creep occur.
- Locate wastewater facilities downwind of local population.
- Build latrines and similar sanitation facilities down gradient of water supply wells. As necessary, evaluate depth to water table including seasonal fluctuations. Pit latrines should not be installed where the water table is shallow or the composition of the overlying deposits make groundwater vulnerable to contamination.
- Employ sensitive siting strategies that take into appropriate consideration impact on trees, wetlands and watercourses, important plant and animal habitat, and significant

historical and archaeological resources. Avoid or mitigate adverse impacts to these resources.

Standard Design Conditions

- In general, design water supply facilities to protect water quality, minimize the potential for contamination, and minimize operation and maintenance costs.
- In general, design wastewater facilities to avoid contamination of water supplies and human exposure, and minimize operation and maintenance costs.
- In general, do not construct new wastewater pipelines unless treatment is provided at the outfall.
- Where latrines are installed, use improved ventilated pit designs that reduce insect vectors.

Standard Construction Conditions

- Establish and adhere to construction timetables that minimize disruption to the normal activities of the construction area.
- Post construction timetables and traffic diversion schedules at the project site.
- 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 as well as during operation and maintenance phases.
- 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, it should use well-graded materials, and it 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.
- Install temporary erosion control and sediment retention measures when permanent ones either are not feasible or are delayed.
- Provide temporary sanitation at the construction site.
- Set protocols for vehicle maintenance to control contamination by grease, oil and fuels.
- Build collection channels leading to oil and/or silt traps, particularly around areas used for vehicle washing or fuelling.
- Build appropriate containment structures around bulk storage tanks and materials stores to prevent spillage entering watercourses.
- Build tanks or other separators for silt-laden material prior to allowing significant outflow into watercourses.
- Avoid pollution of waterways with stockpiled construction materials.
- Cover stockpiled construction materials, as practicable.
- Minimize the disturbance of, and reduce the spread of, ground contaminants.
- Handle, store, use and process branded materials in accordance with manufacturer's instructions and recommendations.
- Use lead-free paint, primers, varnishes and stains.
- Minimize the use of solvent-based paints.
- Introduce measures to control and minimize the volume of waste on site.
- Segregate waste that can be salvaged, re-used or recycled.
- Take waste materials to appropriate, designated local disposal areas.

- Minimize burning of waste materials.
- 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.
- Recycle wastewater to the extent practicable.
- Seal or remove abandoned drains to minimize water contamination.
- Use proper bedding materials for pipes, and backfill appropriately for the pipeline.
- Use riprap (cobbled stone), gravel, or concrete as needed to prevent erosion of drainage structures at the outfall of sanitation projects according to established standards.
- Monitor and repair leaks from cracked containment structures, broken pipes, faulty valves and similar structures.
- Do not use piping containing asbestos.
- Replace lead pipes and joints in drinking water delivery system.
- Provide proper wellhead protection against contaminant sources.
- Keep livestock from grazing immediately up-gradient of water supplies.
- Do not allow animals to drink directly from water sources, unless those sources are subsequently treated.
- In coastal areas, maintain withdrawals within safe yield limits to avoid salt water intrusion and well contamination.
- Ensure that spilled water and rainwater drain to a soakway or equivalent structure.
- Monitor drains and soakways and keep clear of debris.
- Collect and dispose of sludge from wastewater treatment facilities at appropriate frequencies.
- Dispose of sludge in areas designated by local authorities.
- Test sludge for metals, pathogens and other appropriate constituents prior to use as fertilizer.
- Recover and replant topsoil and plants as practicable.
- Re-vegetate areas damaged during construction. Do not remove erosion control measures until re-vegetation is completed.
- As practicable, landscape construction sites in a way that is appropriate to local conditions.

Standard Operations and Maintenance Conditions

- As a rule, financing for water and wastewater infrastructure improvements should not be provided unless appropriate operations and maintenance (O&M) provisions are in place.
- On larger projects, an O&M Manual should be prepared before water or wastewater system operations begin.
- Address financial and system power issues in O&M plans.

Additional Standard Conditions for Health Clinics and Medical Facilities

- Do not dispose of hazardous and chemical wastes to sewer systems.
- Collect and segregate waste from patients treated with cytotoxic drugs.
- Separate and disinfect stools from cholera patients prior to discharge.
- Disinfect blood before discharge to sewers unless there is an adequate wastewater treatment facility.

- Water-soluble, relatively mild pharmaceutical mixtures, such as vitamin solutions, cough syrups, intravenous solutions, eye drops, etc.—but not antibiotics—may be diluted with large amounts of water and then discharged to sewer systems that can handle them.
- Avoid burial of chemical wastes where there is potential for groundwater contamination.