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LAC-IEE-12-57

ENVIRONMENTAL THRESHOLD DECISION

Activity Location: LAC/Cuba

Activity Title: Support of Section 109a of the *Cuban Liberty and Democratic Solidarity Act of 1996*.

Activity Number: 509

Life-of-Activity Funding: \$195 million

Life-of-Activity: FY 2010 - FY 2013

IEE prepared by: Nhelly Saleh Ramirez, LAC/Cuba

Reference ETDs: LAC-IEE-10-103, LAC-IEE-09-30, LAC-IEE-09-20, LAC-IEE-09-12, LAC-IEE-05-07, LAC-IEE-03-30, LAC-IEE-00-09, LAC-IEE-98-03.

Recommended Threshold Decision: Categorical Exclusion,
Negative Determination with Conditions

Bureau Threshold Decision: Categorical Exclusion,
Negative Determination with Conditions

Comments:

This Environmental Threshold Decision amends the above-referenced ETDs to increase the Life-of-Activity Funding from \$180 million to \$195 million and to extend the Life-of-Activity through Fiscal Year 2013. This ETD does not change any other provisions of the above-referenced ETDs.

A **Categorical Exclusion** is issued to civil society training, leadership, organizational and communications capacity building activities of the “Support of Section 109a of the Cuban Liberty and Democratic Solidarity Act of 1996” activity that DO NOT have on-the-ground practical exercises, pilot or demonstration projects or other small-scale development components. No further environmental review will be required for these activities. This is pursuant 22 CFR 216.2(c)(2):

- (i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);
- (iii) Analyses, studies, academic or research workshops and meetings;
- (v) Document and information transfers;
- (xiv) 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.);

A **Negative Determination with Conditions** is issued to civil society training, leadership, organizational and communications capacity building activities that have on-the-ground practical exercises, pilot or demonstration projects or other small-scale development components.

Conditions include the following:

- Potential environmental impacts of these activities will be mitigated or avoided by following the LAC Environmental Guidelines for Development Activities in Latin America and the Caribbean (both English and Spanish versions):

http://www.usaid.gov/locations/latin_america_caribbean/environment/docs/epiq/epiq.html

- To conduct an environmental review of the proposed component or small-scale development activity, the attached “Environmental Mitigation Report” (EMR) process and the above guidelines will be used (see attached). The EMR process is for activities that involve potential minor environmental impacts – illustrative activities may include general small-scale construction and building refurbishment, small-scale water and sanitation systems, road and street rehabilitation, public utility improvement, solid waste collection, irrigation repair and small-scale agriculture. The EMR process employs the “Environmental Screening Form” (Table 1), and when potential environmental impacts are identified, develops an environmental mitigation and monitoring plan (Table 2 and Table 3) using the LAC Environmental Guidelines, to minimize, avoid or eliminate the identified impacts.
- The implementing partner is responsible for conducting the environmental review using the EMR for activities that have minor impacts. The partner will incorporate and budget for the recommended conditions – that is, environmental mitigation measures, and monitoring activities – into the civil society training, leadership, organizational and communications capacity building activities. The implementing partner will submit the EMR to the Bureau

Environmental Officer (through the COR) for approval – BEFORE THE EXERCISE, PILOT OR SMALL-SCALE DEVELOPMENT ACTIVITY CAN BEGIN.

- The implementing partner will ensure that all activities comply with the above conditions, and through its regular reporting requirements, a section on environmental compliance (e.g. mitigation monitoring results) will be included.

Responsibilities

- Each activity manager or **Contract/Agreement Officer Representative (COR/AOR)** is responsible for making sure environmental conditions are met (ADS 204.3.4). In addition, COR/AORs are responsible for ensuring that appropriate environmental guidelines are followed, mitigation measures in the IEE are funded and implemented, and that adequate monitoring and evaluation protocols are in place to ensure implementation of mitigation measures.
- It is the responsibility of the **Strategic Objective (SO) Team** to ensure that environmental compliance language from the ETD is added to procurement and obligating documents, such as activity-related Strategic Objective Grant Agreements (SOAGs) and Modified Acquisition and Assistance Request Documents (MAARDs).
- Spot checks will be conducted to ensure that conditions in the IEE and this ETD are met. These will review whether guidelines are properly used to implement activities under this ETD in an environmentally sound and sustainable manner according to USAID and applicable U.S. Government policies and regulations.
- The implementing **contractor or partner** will ensure that all activities conducted under this instrument comply with this ETD. Also, through its regular reporting requirements, a section on environmental compliance (e.g. mitigation monitoring results) will be included.

Amendments

- Amendments to Initial Environmental Examinations (IEE) shall be submitted for LAC Bureau Environmental Officer (BEO) approval for any activities not specifically covered in the IEE, which include:
 - Funding level increase beyond ETD amount,
 - Time period extension beyond ETD dates (even for no cost extension), or
 - A change in the scope of work, such as the use of pesticides or activities subject to Foreign Assistance Act sections 118 and 119 (e.g. procurement of logging equipment), among others.
- Amendments to IEEs include Environmental Assessments (EA) and approval of these documents by the LAC BEO could require an annual evaluation for environmental compliance.

Victor H. Bullen Date 09-13-2012

Victor Bullen
Bureau Environmental Officer
Bureau for Latin America & the Caribbean

Copy to: Kimberley Rosen, LAC/Cuba, Office of Cuban Affairs
Margarita Guerra, LAC/Cuba
Sharon Sadler-Gray, LAC/Cuba

Copy to: IEE File

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**Initial Environmental Examination (IEE)
(Amendment No. 8 of LAC-IEE-98-03)**

Activity Location:	LAC/Cuba
Activity Title:	Support of Section 109a of the <i>Cuban Liberty and Democratic Solidarity Act of 1996</i> .
Activity Number:	509
Life-of-Activity Funding:	\$195 million
Life-of-Activity:	Fiscal Year 2010 – Fiscal Year 2013
IEE prepared by:	Nhelly Saleh Ramirez, LAC/Cuba
Reference ETDs:	LAC-IEE-10-103, LAC-IEE-09-30, LAC-IEE-09-20, LAC-IEE-09-12, LAC-IEE-05-07, LAC-IEE-03-30, LAC-IEE-00-09, LAC-IEE-98-03.
Recommended Threshold Decision:	Categorical Exclusion and Negative Determination with Conditions

1. BACKGROUND AND ACTIVITY DESCRIPTION

Purpose and Scope of IEE

This IEE amends the above-referenced ETDs to extend the implementation period through Fiscal Year 2013 and the funding ceiling from \$180 million to \$195 million.

2. ACTIVITY DESCRIPTION

Program Activities

USAID provides funding to strengthen civil society leadership, organizational and communications capacity through the transfer of electronic and printed information as well as the provision of training, technical assistance, and materials assistance. In addition, USAID provides humanitarian assistance (basic foodstuff, vitamins and personal hygiene supplies) to politically marginalized Cubans in the island. These efforts may involve undertaking repairs or minor renovations to non-government-owned public purpose buildings and infrastructure to support independent libraries.

3. Recommended Threshold Decisions and Mitigation Actions:

Recommendation

A Negative Determination with Conditions, pursuant to 22 CFR 216.3(a)(3), is recommended for civil society training, leadership, organizational and communications capacity building activities that have on-the-ground practical exercises, pilot or demonstration projects or other small-scale development components.

A Categorical Exclusion is recommended for civil society training, society leadership, organizational and communications capacity building activities that do NOT have on-the-ground practical exercises, pilot or demonstration projects or other small-scale development components, pursuant to 216.2

- (i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);
- (iii) Analyses, studies, academic or research workshops and meetings;
- (v) Document and information transfers;
- (xiv) 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.);

Approval: Sharon Sadler-Gray
 Sharon Sadler-Gray, Director
 Office of Cuban Affairs
 Bureau for Latin America and the Caribbean

Date: Sept. 13, 2012

Approval: Sharon Sadler-Gray
 Sharon Sadler-Gray, Director
 Office of Cuban Affairs
 Bureau for Latin America and the Caribbean

Date: _____

GUIDELINES FOR IMPLEMENTING PARTNERS ON THE USAID ENVIRONMENTAL MITIGATION REPORT (EMR)

April 13, 2009

I. BACKGROUND

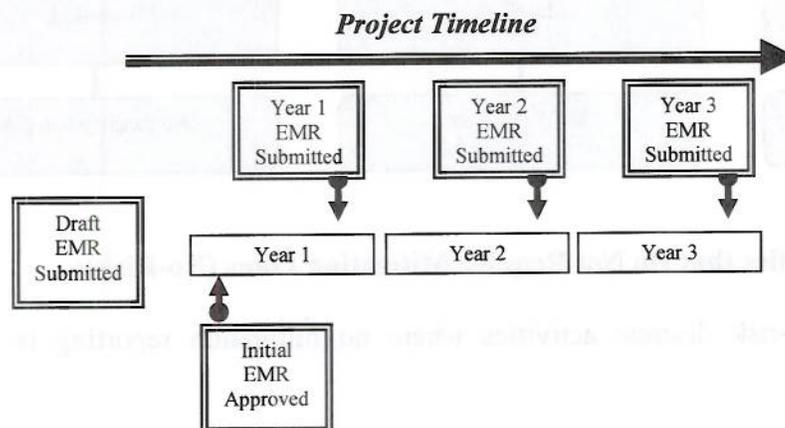
All projects funded by USAID must conform to US environmental regulations (22 CFR 216) requiring evaluation to ensure that no adverse environmental impacts result from the projects that cannot be mitigated. The Environmental Mitigation Report (EMR), so described by these guidelines, ensures programmatic compliance with 22 CFR 216 by meeting the conditions specified in the Environmental Threshold Decision (ETD) authorized by the LAC Bureau Environmental Officer (BEO).

Programs carried out by USAID implementing partners (IPs) may include a large range of discrete activities under an award that will likely have a risk for adverse environmental impacts. Illustrative discrete activities include road and street rehabilitation, small environmental improvement projects, building refurbishment, small construction activities, solid waste collection, irrigation repair and small-scale agriculture. These discrete activities are not specified in the program solicitation so as to permit flexibility for innovative and entrepreneurial approaches by the IP based upon the needs of the targeted communities. In response to the lack of specificity in the solicitation, this EMR procedure will provide for both the screening for environmental risk and mitigation plan.

The IP program manager can work with the USAID BEO (or officer designated by the BEO) to ensure impacts are sufficiently identified and to suggested mitigation actions.

The inclusion of specific examples of activities in this or any other environmental document prepared for the LAC/Cuba Program is intended to illustrate explanations of environmental compliance concepts. Any LAC/Cuba Program activity must first comply with applicable legal restrictions regarding assistance to Cuba

Figure 1. Timeline of Reporting Requirement for Environmental Mitigation



Timing of Reporting Requirements

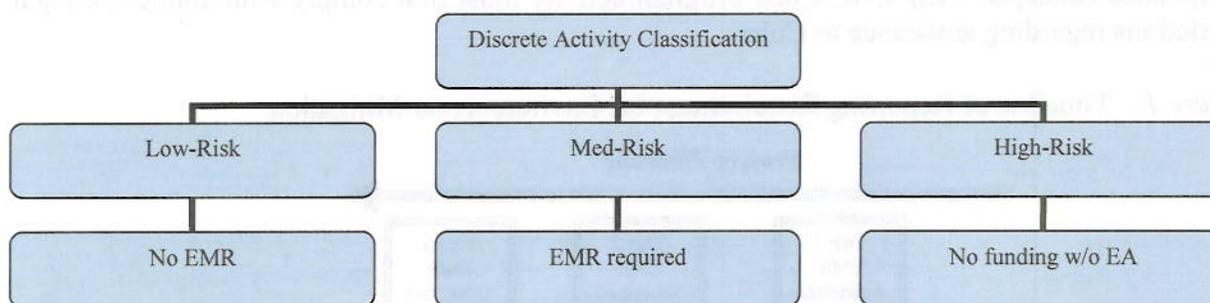
The types of activities envisioned under this planning process could be arranged in a number of ways. Generally, a draft EMR will be submitted with the draft Scope of Work at the time the community-level activity proposal is submitted to the IP. Once the award for the community-level activity is made, the reporting requirements include A) an initial EMR approved by the BEO (or officer designated by the BEO) outlining a mitigation plan over the project life, B) an annual EMR(s) describing the mitigation status (Figure 1). The report should not exceed ten pages (excluding annexes).

II. Initial Environmental Mitigation Report

1. Classification of Level of Risk

Components of a program or discrete activities under an award can have varying level of risk for environmental damage and therefore required different courses of action (Figure 2). No-risk activities, classified under “i” below, do not require the EMR as they are already addressed under a “categorical exclusion” determination in the original IEE and Environmental Threshold Decision for the LAC/Cuba Program. High-risk activities (“ii”) will have significant environmental impacts that will require an Environmental Assessment (EA) contracted through the IP with BEO consultation to a professional Environmental Impact organization with final approval by the LAC Bureau Environmental Officer. Such activities are not to be avoided if they meet a crucial need of the community (e.g., solid waste disposal facility, municipal-scale waste water treatment plant). Medium-risk activities (“iii”) are addressed in the IEE and Environmental Threshold Decision for the LAC/Cuba Program and will require the IP to screen environmental impacts and plan for mitigation of adverse environmental impacts. It is to these medium-risk activities that this EMR guidance primarily applies.

Figure 2. Schematic of required action based on the level of risk of a component or discrete activity under an award.



i. **Discrete Activities that Do Not Require Mitigation Plans (No-Risk):**

An illustrative list of no-risk discrete activities where no mitigation reporting is required includes:

- Education or training*, unless it implements or leads to implementation of actions that impacts the environment (such as construction of schools),
- Community awareness initiatives,
- Controlled research/demonstration projects in a small area,
- Technical studies or assistance,
- Information transfers.

If there is a risk that the actual *implementation* of skills learned in a training could adversely impact the environment (e.g., training on agricultural techniques), the training is expected to include as part of its curriculum, an analysis of environmental impacts and planning for mitigation.

ii. Discrete Activities that Cannot be Supported (High-Risk):

Under the environmental regulations of USAID, if there is a discrete activity which is considered critical to the needs of the community that may have a significant environmental impact, such activities will require an Environmental Assessment. In the case of pesticide use a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) will need to be prepared by the partner and approved by the LAC BEO. Such activities include but are not limited to:

- Agricultural, livestock introduction or other activities that involve forest conversion,
- Resettlement of human population,
- Large water management systems such as dams or impoundments,
- Drainage of wetlands,
- Introduction of exotic plants or animals,
- Permanent modification of the habitat supporting an endangered species,
- Industrial level plant production or processing (this does not include community or regional plant nurseries aimed at restoring areas after fires),
- Installation of aquaculture systems in sensitive lakes, marine waters (not land-based fish ponds),
- Procurement of timber harvesting equipment, including chainsaws,
- Use of pesticides (insecticides, herbicides, acaricides, fungicides),
- Large scale construction in un-degraded land,
- Large scale new construction involving permanent living quarters and/or sanitation facilities,
- Cutting of trees over 20 cm diameter breast height, especially tropical trees, except as needed to control disease or maintain forest health.
- Construction on new roads or upgrading/maintenance of extensive road, fire break or trail systems through un-degraded forest land or natural habitats.

iii. Discrete Activities that can be Supported if Mitigation Measures are Planned and Implemented (Medium-Risk):

Many discrete activities under an agreement will fall between the two extremes mentioned above and offer some adverse environmental impact that can be mitigated with proper planning. For these activities the IP will be responsible for completing the EMR on an annual basis, as

specified in the agreement with the IP. Funding will depend on proof that the project is taking an environmentally sound approach and that IPs are aware and planning for the potential impacts.

2. Sector-Specific Environmental Screening Form

For medium-risk discrete activities, the IP will be responsible for completing the EMR on an annual basis. First, the IP must submit an initial EMR at the project planning stage. The initial EMR will include project-specific information on discrete activities as outlined in the “Environmental Screening Form” (Attachment 1, Table 1) and the “Identification of Mitigation Plan” (Attachment 1, Table 2).

The Environmental Screening Form contains information relevant to the potential environmental impact over the life of activity to natural resource and communities, local planning permits, and environment and health. If items in the Environmental Screening Form (Attachment 1, Table 1) from Column “A” are checked then items for monitoring and mitigation are to be specified in the “Identification of Mitigation Plan” (Attachment 1, Table 2). The Mitigation Plan simply outlines the plan of action for mitigation of planned activities. The BEO (or designee) is to approve these forms, with special attention to those projects with identified impacts (i.e., projects with any check marks in Column A).

For reference on mitigation information on a wide variety of discrete activities, refer to the “[USAID LAC Environmental Guidelines](#)”. Illustrative sector-specific guidelines include: WHO guidelines for handling and disposal of medical waste, “[Low-Volume Roads Engineering: Best Management Practices Field Guide \(Keller and Sherar, 2003\)](#)”, the World Wildlife Fund Agriculture and the Environment handbook

III. Annual Environmental Mitigation Report

On an annual basis each implementing partner will submit an “Environmental Mitigation Report” (EMR) using the attached template (Attachment 1). The EMR contains information relevant to the potential environmental impact over the life of a discrete activity under an award and includes: A) a copy of the initial EMR completed during the initial project planning (reference section II above); B) the prescribed mitigation measures using the “Identification of Mitigation Plan (Attachment 1, Table 2)”; and C) synthesized data on these mitigation measures collected throughout the year and tracked in the Environmental Monitoring and Evaluation Tracking Table (Attachment 1, Table 3). As it is often difficult to quantitatively measure progress of complex mitigation measures, it is necessary to include inserted digital photos (with relevant maps) to describe progress of mitigation activities.

USAID expects for the IP to clearly demonstrate competence in implementing discrete activities using best management practices which most often will provide the additional benefit of environmental protection. As a review, environmental impact is based upon both the 1) underlying condition of the surrounding environment (e.g., sensitivity of the river, degree of

slope and stability of soil) and 2) the nature of the activity itself (e.g., solid waste removal, road construction/rehabilitation). For example, it is logical when developing an EMR to cluster the mitigation measures those activities that are of a similar nature and have comparable underlying conditions (e.g., well rehabilitation in a peri-urban setting). It is also common sense, however, that for those activities that are of similar nature (e.g., well rehabilitation), but operating under widely different underlying environmental conditions (e.g., peri-urban setting vs. upland plateau vs. coastal plain), that the environmental mitigation measures would not be completely clustered. In this specific case for example, protection of the water source from automobile oil contamination would be more relevant in a peri-urban setting while salinization would be more so in a coastal plain. Further, there will simply be some mitigation measures for well rehabilitation that will be common across all wells (i.e., prevention of disease vector breeding sites and protection from human or animal waste contamination) and hence clustered in the EMR.

Sections of the EMR include:

1. EMR Coversheet
2. EMR Narrative (to be filled out with project specific information)
3. Annexes:
 - a. Environmental Screening Form (Table 1),
 - b. Identification of Mitigation Plan (Table 2)
 - c. Environmental Monitoring and Evaluation Tracking Table (Table 3).
4. Photos, Maps, Level of Effort

Drafted: February 7, 2007; L. Poitevien (USAID/Haiti), M. Donald (USAID/Dominican Republics), E. Clesceri (USAID/Washington). Rev'd April 2009; V. Bullen (LAC/BEO), D. Young (GC/LAC).

GUIDELINES FOR IMPLEMENTING PARTNERS ON THE USAID ENVIRONMENTAL MITIGATION REPORT (EMR)

Attachment 1:

**I. COVERSHEET FOR ENVIRONMENTAL MITIGATION REPORT (EMR)
LAC/Cuba Program**

Title of IP Activity: _____

IP Name: _____

Funding Period: FY _____ - FY _____

Resource Levels (US\$): _____

Report Prepared by: Name: _____ Date: _____

Date of Previous EMR: _____ (if any)

Status of Fulfilling Mitigation Measures and Monitoring:

_____ Initial EMR describing mitigation plan is attached (Yes or No).

_____ Annual EMR describing status of mitigation measures is established and attached (Yes or No).

_____ Certain mitigation conditions could not be satisfied and remedial action has been provided within the EMR (Yes or No).

USAID Clearance of EMR:

Cognizant Technical Officer: _____ **Date:** _____

Bureau Environmental Officer: _____ **Date:** _____

II. Environmental Mitigation Report Narrative

Note: summary instructions are in italics and not to be included in the report, but rather should be filled out with project specific information)

Note: Outline to be included in the report is in bold.

1. **Background, Rationale and Outputs/Results Expected:**

Summarize and cross-reference proposal if this review is contained therein.

2. **Activity Description:**

Succinctly describe location, siting, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during construction, how intervention will operate and any ancillary development activities that are required to build or operate the primary activity (e.g., road to a facility, need to quarry or excavate borrow material, need to lay utility pipes to connect with energy, water source or disposal point or any other activity needed to accomplish the primary one but in a different location). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these.

3. **Environmental Baseline:**

Describe affected environment, including essential baseline information available for all affected locations and sites, both primary and ancillary activities.

4. **Evaluation of Environmental Impact Potential of Activities (Table 2):**

As a component of the Identification of Mitigation Plan (Attachment 1, Table 2), describe impacts that could occur before construction starts, during construction and during operation, as well as any problems that might arise with restoring or reusing the site, if the facility or activity were completed or ceased to exist. 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 positive impacts and how the natural resources base will be sustainably improved.

For example, any activity that increases human presence in an area, even temporarily, will increase noise, waste, and the potential for hunting, timbering, etc.

5. Environmental Mitigation Actions (Tables 2 & 3):

For each component of the program, list the mitigation measures in the Identification of Mitigation Plan (Table 2) and monitoring of these mitigation measures in the Environmental Monitoring and Evaluation Tracking Table (Table 3).

Describe status of complying with the conditions. Examples of the types of questions an IP should answer to describe "status" follow.

- 1) What mitigation measures have been put in place? How is the successfulness of mitigation measures being determined? If they are not working, why not? What adjustments need to be made?**
- 2) What is being monitored, how frequently and where, and what action is being taken (as needed) based on the results of the monitoring? In some situations, an IP will need to note that the monitoring program is still being developed with intent to satisfy the conditions. Alternatively, it could happen that the conditions cannot be achieved because of various impediments.**

III-A. Environmental Screening Form (Table 1)

Name of Activity: _____ Type of Activity: _____ Grantee: _____ Date: _____		Column A	Column B	Col C	
		Yes	No	High Risk	Medium-Risk
IMPACT ON NATURAL RESOURCES & COMMUNITIES					
1	Will the project involve construction ¹ of any type of structure (building, check dam, walls, etc)?				
2	Will the project involve the construction ² or repair of roads or trails?				
3	Will the project involve the use, involve plans to use or training in the use of any chemical compounds such as pesticides ³ (including neem), herbicides, paint, varnish, lead-based products, etc?				
4	Involve the construction or repair of irrigation systems?				
5	Involve the construction or repair of fish ponds?				
6	Involve the disposal of used engine oil?				
7	Will the project involve implementation of timber management ⁴ or extraction of forest products?				
8	Are there any potentially sensitive terrestrial or aquatic areas near the project site, including protected areas?				
9	Does the activity impact upon wildlife, forest resources, or wetlands?				
10	Will the activities proposed generate airborne gases, liquids, or solids (i.e. discharge pollutants)?				
11	Will the waste generated during or after the project impact on neighboring surface or ground water?				
12	Will the activity result in clearing of forest cover?				
13	Will the activity contribute to erosion?				
14	Is the activity incompatible with existing land use in the vicinity?				
15	Will the activity contribute to displace housing?				
16	Will the activity affect unique geologic or physical features?				
17	Will the activity contribute to change in the amount of surface water in any body?				
18	Will the activity deal with mangroves and coral reefs?				
19	Will the activity expose people or property to flooding?				
20	Will the activity contribute substantial reduction in the amount of ground water otherwise available for public water supplies?				
21	Will the activity create objectionable odors?				
22	Will the activity violate air standard?				
LOCAL PLANNING PERMITS					
23	Does the activity e.g. infrastructure improvements require local planning permission(s)?				
24	Does the activity meet the national building code (e.g. infrastructure improvements)?				
25	Is the activity incompatible with existing land use?				

ENVIRONMENT & HEALTH				
26	Will the project activities create conditions encouraging an increase of waterborne diseases or populations of disease carrying vectors?			
27	For road rehabilitation as well as water and sanitation grants, has a maintenance plan been submitted?			
28	Will the activity generate hazards or barriers for pedestrians, motorists or persons with disabilities?			
29	Will the activity increase existing noise levels?			
30	Will the project involve the disposal of syringes, gauzes, gloves and other biohazard medical waste?			

¹ Construction projects need to be reviewed for scale, planned use, building code needs and maintenance. Some small construction projects, such as building an entrance sign to a park, may require simple mitigations whereas larger buildings will require more extensive review and monitoring.

² New construction of roads and trails will require a full environmental assessment of the planned construction.

³ The planned involvement of pesticides will trigger the need to develop a Supplemental Initial Environmental Examination that meets USAID pesticide procedures (Pesticide Evaluation Report and Safer Use Action Plan or "PERSUAP") for the project.

⁴ Any activities the involve harvesting trees or converting forests will require a full environmental assessment of the activity.

III-B. Identification of Mitigation Plan (Table 2)

→ Enter the Question/Row # of the potential negative impacts with check marks in Column A (Table 1) and complete table below for mitigation measures to reduce or eliminate the issue.

#	Sub-activity or component	Description of Impact	Mitigation Measures
1	Component 1		
2	Component 2		
3			
4			

* provide overview of measures used from the USAID LAC Environmental Guidelines or other pertinent guidelines, details on exact monitoring plan are illustrated in Table 3, Environmental Monitoring and Evaluation Tracking Table.

RECOMMENDED ACTION (Check Appropriate Action):

(Check)

(a)	The project has no potential for substantial adverse environmental effects. No further environmental review is required.	
(b)	The project has little potential for substantial adverse environmental effects, however the recommended mitigation measures will be incorporated in the activity design. No further environmental review is required.	
(c)	The project has substantial but mitigatable adverse environmental effects and required measures to mitigate environmental effects will be incorporated.	
(d)	The project has potentially substantial or significant adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared.	
(e)	The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required.	
(f)	The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.	

