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INITIAL ENVIRONMENTAL EXAMINATION

ACTIVITY DATA

Activity Name:	Conservation Works
Geographic Location(s) (Country/Region):	Liberia
Amendment (Yes/No), if Yes indicate # (1, 2...):	No
Implementation Start/End Date (FY or M/D/Y):	June, 2021 - June, 2027
If Amended, specify New End Date:	
Solicitation/Contract/Award Number(s):	TBD
Implementing Partner(s):	TBD
Bureau Tracking ID:	Liberia Conservation Works IEE https://ecd.usaid.gov/document.php?doc_id=53110
Tracking ID of Related RCE/IEE (if any):	
Tracking ID of Other, Related Analyses:	

ORGANIZATIONAL/ADMINISTRATIVE DATA

Implementing Operating Unit(s): (e.g. Mission or Bureau or Office)	USAID/Liberia
Other Affected Operating Unit(s):	None
Lead BEO Bureau:	AFR Bureau
Funding Account(s) (if available):	
Original Funding Amount:	\$19.5 million
If Amended, specify funding amount:	
If Amended, specify new funding total:	
Prepared by:	Environmental Team, USAID/Liberia
Date Prepared:	January, 2021

ENVIRONMENTAL COMPLIANCE REVIEW DATA

Analysis Type:	☒ Initial Environmental Examination	☐ Deferral
Environmental Determination(s):	☒ Categorical Exclusion(s) ☒ Negative with conditions ☐ Positive ☐ Deferred (per 22 CFR 216.3(a)(7)(iv))	
IEE Expiration Date (if applicable):	December 30, 2027	
Additional Analyses/Reporting Required:		
Climate Risks Identified (#):	Low _____ Moderate <u>X</u> High _____	
Climate Risks Addressed (#):	Low _____ Moderate <u>X</u> High _____	

THRESHOLD DETERMINATION AND SUMMARY OF FINDINGS

ACTIVITY SUMMARY

The purpose of this IEE is to describe the specific interventions to be implemented under the Conservation Works Activity. The overall goal of the activity is to promote biodiversity conservation in Liberia. This will be achieved through four intervention areas:

1. Increase the number of Proposed Protected Areas (PPA) that are legally recognized as Protected Areas (PA).
2. Improve the protection and management of target PPA and PA landscapes at the local and national level.
3. Increase prosperity and prospects for communities living around protected areas.
4. Increase economic growth by supporting conservation-compatible investment.

In accordance with 22CFR216, this IEE provides the initial review of all activities to be implemented with respect to the reasonably foreseeable effects on natural and physical environment and human health and to provide recommended threshold determinations including attendant conditions in some instances for all planned and foreseen activities under Conservation Works.

ENVIRONMENTAL DETERMINATIONS

The purpose of this IEE, in accordance with 22CFR216, is to provide the first review of the reasonably foreseeable effects on the environment, as well as to provide determinations for the Conservation Works Activity. Based on the activities descriptions enumeration, this IEE, in accordance with Title 22, Code of Federal Regulations, Part 216 (22CFR216), is to provide a preliminary review of the reasonably foreseeable effects on the environment of the USAID intervention described herein and recommend determinations and, as appropriate, conditions, for these activities. Upon approval, these determinations become affirmed, per 22CFR216 and specified conditions become mandatory obligations of implementation. This IEE also documents the results of the project/activity level Climate Risk Management process in accordance with USAID policy (specifically, ADS 201mal). process meant to achieve environmentally sound activity design and implementation.

This IEE is a critical element of USAID's mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation. Potential environmental impacts should be addressed through formal environmental mitigation and monitoring plans (EMMPs) and/or Environmental Assessments (EAs), if needed

Upon approval of this document, the determinations become affirmed, per Agency regulations (22 CFR 216).

TABLE 1: ENVIRONMENTAL DETERMINATIONS

Activities	Categorical Exclusion Citation (if applicable)	Negative Determination	Positive Determination	Deferral
Increase the number of Proposed Protected Areas (PPA) that are legally	X			

recognized as PAs. (IR 1)				
Improve protection and management of target PPA and PA landscapes at the local and national level. (IR2)	X			
Increase prosperity and prospects for communities living around protected areas. (IR3)		X		
Increase economic growth by supporting conservation-compatible investment. (IR4)		X		

CLIMATE RISK MANAGEMENT

Liberia is vulnerable to the impacts of climate variability and change, such as warmer temperatures, increases in annual rainfall, and increases in the frequency of heavy rainfall events. These climate change impacts present challenges to the country's socio-economic development. Liberia's low adaptive capacity to respond to climate change is partially due to the detrimental effects of the 1989-2003 Civil War. Since the war, the government, along with various international and national institutions and organizations, has been taking actions to better understand and address climate change challenges throughout the country. Remaining needs include data on short and long-term climate change impacts and vulnerabilities within the country, as well as the financial, technological, and human resources to identify adaptation priorities and implement appropriate adaptation plans and strategies. Short-term climate variability is already affecting Liberia, including temperature increases and rainfall variability. As the GoL notes in their new national climate policy, "the impacts of climate change in Liberia not only undermine development gains but also pose serious risk to food security and adaptive capacity," requiring urgent and concerted national action.

As impacts become more pronounced, climate change may erode the progress that Liberia has made and limit gains in the future, including the government's ability to address its development challenges. The Climate Risk management results indicated that increased temperatures, changes in amount and duration of rainfall and sea level rise would be addressed through a range of integrated strategies. Engineering analysis preceding design activities will include consideration of climate change and its potential impacts on the location (siting), functionality and sustainability of resulting infrastructure and infrastructure services. Such analysis will include identification of relevant data sets and gaps, review of local building standards and codes for adequacy; and determination of safety factors or other measures of uncertainty that will be carried through design. The results of this analysis, including risks identified and how they are addressed, shall be documented.

In the revised ADS 201, dated January 23, 2017, Climate Risk Management is a mandatory analysis required for all new projects (ADS 201.3.3.13) and activities (ADS 201.3.4.5) designed after October 1, 2016. Climate Risk Management (CRM) allows USAID to assess, mitigate, and adapt to adverse and beneficial climate impacts to improve the resilience of projects and activities to potential risks associated with climate change.

The design team conducted the assessment using the climate risk screening tools available at Climate Links. The in-depth analysis concluded that proposed activities have an overall

moderate risk rating given the activity's main objectives. The risks analysis also provide opportunities to create awareness and identify more information on climate adaptation.

The climate risk screening matrix will be shared with the implementing partner and ensure the inclusion of climate risks/adaptation and opportunities in work plans as needed.

BEO SPECIFIED CONDITIONS OF APPROVAL

Reg 216/IEE Model Parks and Protected Areas SOM Conditions:

1. Develop and execute a community engagement plan for the project and identify any activities with potential environmental and/or social impacts, including consultation in accordance with USAID's [Policy on Promoting the Rights of Indigenous Peoples \(Pro-IP Policy\)](#) when Indigenous Peoples may be affected;
2. Consistent with international best practices, (a) assess the environmental and social impacts of the proposed project (consider IAIA social impact assessment guidance, https://www.iaia.org/uploads/pdf/SIA_Guidance_Document_IAIA.pdf), (b) avoid, mitigate or address negative impacts as appropriate, and (c) monitor the impacts of its proposal, particularly potential project impacts on land or resource rights claimed by affected local communities;
3. Train and monitor any eco-guards, park rangers, and other protected area law enforcement personnel regarding the professional and ethical execution of their duties, **including upholding human rights, and document compliance with this requirement**, as appropriate;
4. USAID will ensure that Leahy Vetting has occurred.
5. Establish and maintain a Grievance and Redress Mechanism, allowing members of the affected community to share environmental and social grievances (including potential human rights violations) with the offeror, and how such grievances will be reported to the USAID COR within 72 hours.

COVID-19 Condition:

In order to reduce COVID-19 transmission during the implementation of these activities, USAID managers must:

- Ensure all activities addressed by this IEE adhere to current, applicable COVID-19 guidelines. Refer to the AFR COVID-19 PIEE (attached and linked here -- https://ecd.usaid.gov/document.php?doc_id=52754) for links to U.S. and international guidance on appropriate measures to reduce COVID-19 transmission. Such measures may include, but are not limited to social distancing, use of personal protective equipment, limiting the size of gatherings and travel, and effective disinfection.
- Share with the partner:
 - Applicable COVID-19 guidance from the USAID Mission or U.S. Embassy;
 - Applicable COVID-19 guidance from local authorities;
 - The following Agency-wide "COVID-19 GUIDANCE FOR IMPLEMENTING PARTNERS" page on the USAID website: <https://www.usaid.gov/work-usaid/resources-for-partners/covid-19-guidance-implementing-partners>.
- Ensure that partners have appropriate training, authorization, and resources to meet the expectations of the applicable guidance while implementing these activities.

IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Sections 3, 4, and 5 of the IEE and any BEO Specified Conditions of Approval. Per 22CFR216.3(a)(9), when ongoing programs are revised to incorporate a change in scope or nature, a determination will be made as to whether such change may have an environmental impact not previously assessed. If so, this IEE will be amended to cover the changes. Per ADS 204, it is the responsibility of the USAID AOR/COR to keep the MEO/REA and BEO informed of any new information or changes in the activity that might require revision of this environmental analysis and environmental determination.

In addition to the recommended threshold determinations enumerated in Section 3 of this IEE, general monitoring and implementation requirements are specified in Section 4 of the IEE. These require:

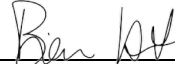
- a) Implementing Partner briefings on environmental compliance responsibilities;
- b) For small grants and sub-grants programs, introduce/adapt the formal USAID AFR subproject/subgrant review process, using the AFR Environmental Review Form;
- c) Development of environmental mitigation and monitoring plans (EMMPs);
- d) Integration and implementation of EMMPs in work plans and budgets;
- e) Integration of compliance responsibilities in prime and sub-contracts and grant agreements;
- f) Assurance of sub-grantee and sub-contractor capacity and compliance;
- g) Conservation Works team environmental compliance oversight and monitoring;
- h) 22 CFR 216 documentation coverage for new or modified activities; and
- i) Compliance with host country requirements.

As required by ADS204.3.4, the USAID/Liberia team managing this activity will actively monitor and evaluate whether environmental consequences unforeseen by this IEE arise during activity implementation and modify or end activities as appropriate. Further, if additional activities not covered by this IEE are added to the activity, an amended environmental examination will be prepared and approved prior to implementation of activities.

USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

ACTIVITY NAME: Conservation Works Activity

Bureau Tracking ID: https://ecd.usaid.gov/document.php?doc_id=53110

Approval:	<u>Cleared electronically</u> Sara R. Walter, Mission Director	<u>02/20/2021</u> Date
Clearance:	<u>Cleared</u> Rebekah Eubanks, Deputy Mission Director	<u>02/11/2021</u> Date
Clearance:	<u>Cleared</u> Ian Winborne, Design Team Lead	<u>01/22/2021</u> Date
Clearance:	<u>Cleared</u> John Pasch, Economic Growth Office Director	<u>01/26/2021</u> Date
Clearance:	<u>Cleared</u> Kokulo Y. Yorgbor, Mission Environmental Officer	<u>02/09/2021</u> Date
Clearance:	<u>Cleared electronically</u> Henry Aryeetey, Regional Environmental Advisor	<u>02/10/2021</u> Date
Clearance:	<u>Cleared</u> Ro Wietecha, Regional Legal Officer	<u>02/10/2021</u> Date
Clearance:	<u>Cleared</u> Colin Quinn, AFR Bureau Climate Integration Lead	<u>03/05/2021</u> Date
Clearance:	<u>Cleared</u> Kimberlee Bell, Program, Planning, and Design Office Director	<u>02/09/2021</u> Date
Concurrence:	<u></u> Brian Hirsch, Bureau Environmental Officer	<u>03/17/2021</u> Date

INITIAL ENVIRONMENTAL EXAMINATION

1.0 ACTIVITY DESCRIPTION

1.1 PURPOSE of the IEE

The purpose of this document, in accordance with Title 22, Code of Federal Regulations, Part 216 (22 CFR 216), is to provide a preliminary review of the reasonably foreseeable effects on the environment of the USAID intervention described herein and recommend determinations and, as appropriate, conditions, for these activities. Upon approval, these determinations become affirmed, and specified conditions become mandatory obligations of implementation. This IEE also documents the results of the Climate Risk Management process in accordance with USAID policy (specifically, ADS 201mal).

This IEE is a critical element of USAID's mandatory environmental review and compliance process meant to achieve environmentally sound design and implementation. Potential environmental impacts should be addressed through formal Environmental Mitigation and Monitoring Plans (EMMPs) and/or Environmental Assessments (EAs), if needed.

1.2 ACTIVITY OVERVIEW

The Conservation Works activity (CWA) contributes to USAID/Liberia's Country Development and Cooperation Strategy (CDCS) Development Objective (DO) 1: Improve market driven economic growth in Liberia. The Goal of the CWA will be to conserve biodiversity while increasing economic growth in targeted areas. This will be achieved through four components:

- a. Increase the number of Proposed Protected Areas (PPA) that are legally recognized as Protected Areas (PA).
- b. Improve the protection and management of target PPA and PA landscapes at the local and national level.
- c. Increase prosperity and prospects for communities living around protected areas.
- d. Increase economic growth by supporting conservation-compatible investment.

There are strong reasons for concern over the Liberian environment. For example:

- The Upper Guinean Rainforest, a biodiversity hotspot, regulator of the hydrological regime of Liberia's major rivers, and home to some of the last remaining western chimpanzee populations has been reduced by deforestation and logging.
- The hydrologic regimes of the region's largest rivers are experiencing declines in volume flow that cannot be explained by variation in rainfall;¹
- Wildlife poaching, trade and trafficking and over-harvesting of bushmeat continue despite efforts to control the problem.

¹ECOWAS-SWAC/OECD (2006) Atlas on Regional Integration in West Africa ECOWAS/SWAC

It is widely accepted that healthy ecosystems and the services they provide are essential components of climate change adaptation and resilient natural and socio-economic systems. The Upper Guinean Rainforest provides critical ecosystem services:

- The regulation of the hydrological cycle by the Upper Guinean Rainforest ecosystems, where Liberian rivers originate, is vital for the region's economy, food, security, transportation, peace, and hydropower generation.
- Less predictable rainfall and the likelihood of increased frequency of extreme climatological events magnifies the importance of the Guinean Forest as a regulator of the hydrological cycle.
- The Upper Guinean Rainforest provides a plethora of non-timber forest products (NTFP) to local populations including animal protein, fuel, medicine, raw material for construction, honey, and a number of products for which there are emerging markets.
- A recent study found that investing in adaptation and sustainable use of resources in the Upper Guinean Rainforest ecosystem would generate more simultaneous benefits in food security and biodiversity than in any other terrestrial ecosystem in West Africa.

Finally, maintaining the integrity of Liberia's ecosystems, particularly the Upper Guinean Rainforest is of global importance because:

- The Upper Guinean Rainforest, the most bio-diverse terrestrial ecosystem in West Africa, is one of the 25 most threatened reservoirs of plant and animal life on Earth. It also has the highest mammal diversity of any biodiversity hotspot and is among the highest priorities for primate conservation. The Upper Guinean Rainforest harbors some of the few remaining chimpanzee populations in the world.

1.3 ACTIVITY DESCRIPTION

1.3.1 Increase the number of Proposed Protected Areas (PPA) that are legally recognized as PAs. (IR 1)

Securing forest landscapes as Protected Areas (PA) is critical for ensuring biodiversity conservation in Liberia. PAs have legal protection, a bill for each PA is voted on and passed by the legislature and signed into law by the President. The generally large, contiguous PAs provide critical habitat and allow animals to move seasonally or to establish new territories, especially for larger species. With legal protection and relatively high populations of wildlife, PAs are assets that can attract tourists and researchers, who can bring much needed money into communities bordering the PAs. Despite the benefits of PAs, Liberia has only five protected areas. Twelve PPAs are currently in one of several stages of gazettelement.

Policy and Governance Interventions:

- i. Create a national plan for gazettelement of all PPAs.

Capacity Building Interventions

- i. Training and mentoring for officials of the Forestry Development Authority (FDA) to help standardize and improve the quality and efficiency of the gazettelement process.

- ii. Training and other capacity building interventions to improve forest communities' understanding of and participation in the gazettement process.

Gazettement Support Interventions

- i. Provide direct support, in partnership with the FDA, to advance gazettement for PPAs.
- ii. Support community mapping and boundary line demarcation for PPAs.
- iii. Support ecological surveys of PPAs.
- iv. Support all Free, Prior, and Informed Consent (FPIC) interventions to ensure that communities have been fully informed and consent to creation of new PAs.

1.3.2 Improve protection and management of target PPA and PA landscapes at the local and national level. (IR2)

- i. Improve FDA capacity to manage PPA and PA landscapes.
- ii. Improve FDA capacity to enforce applicable laws, regulations, and policies governing PPA and PA landscapes.
- iii. Increase community level understanding of conservation principles and incentivize them to improve conservation of forest resources in PPA and PA landscapes.
- iv. Empower communities to advocate for biodiversity conservation and incentivize them to do so.
- v. Identify best practices for community conservation and management.
- vi. Form hubs or multi-community groups to improve communication between communities and increase power to advocate at the local and national level.
- vii. Improve capacity for data and research in forest ecosystems.

1.3.3 Increase prosperity and prospects for communities living around protected areas. (IR3)

- i. Through community consultations, identify potential livelihood interventions that could effectively improve income, economic security, and food security for forest communities.
- ii. Provide technical assistance and capacity building for new livelihood interventions.
- iii. Promote sustainable agricultural systems that increase dietary diversity and discourage shifting agricultural practices.
- iv. Provide tools and inputs to support new livelihoods interventions.
- v. Improve market access for forest communities.
- vi. Create enterprise groups to increase negotiation power and market share.
- vii. Introduce and develop village savings and loan associations.

1.3.4 Increase economic growth by supporting conservation-compatible investment. (IR4)

- i. Improve networking and coordination within the private sector and between the private sector and the GOL.
- ii. Support national and international marketing campaigns to promote sustainable ecotourism in Liberia.
- iii. Provide technical assistance to conservation enterprises.
- iv. Provide matching investments to conservation enterprises.
- v. Support capacity building and workforce development programs for workers in conservation enterprises.

- vi. Support small scale construction of trails, signs, benches, palava huts, and similar.

WILL THIS ACTIVITY INVOLVE CONSTRUCTION AS DEFINED BY ADS 201 AND 303? YES

2.0 BASELINE ENVIRONMENTAL INFORMATION

Liberia has four major ecological zones: coastal plains; upper highland tropical forest; lower tropical forest zone; and a northern savannah zone and lies entirely within the Upper Guinean Forest ecosystem. Liberia contains two of the last three remaining large blocks of Upper Guinean Rainforest in West Africa. These biologically rich forests are home to approximately 240 timber species, 2,000 flowering plants, 600 bird species, 125 mammal species, 74 species of reptile, and more than 1,000 insect species. The Upper Guinean Forest ecosystem and is identified by Conservation International as a “Biodiversity Hotspot.”

The Environmental Threats and Opportunities Assessment (ETOA) completed by USAID/Liberia in late 2018 identified several concerns related to development, natural resource management, the lack of water and waste management infrastructure, and the lack of enforcement of environmental laws. As a result of the destruction of Liberia’s infrastructure during the prolonged conflict, piped water, drainage, wastewater, and solid waste management systems are severely lacking. As the ETOA points out, in spite of the EPA Act and the EPM Law that authorize the creation of regulations, rules, standards and guidelines, as well as the provide for penalties for violation, EPA has not officially promulgated any of these regulations, rules, standards and guidelines, so enforcement is not possible. The absence of a law enforcement division within the FDA also appears to hamper enforcement efforts.

2.1 LOCATIONS AFFECTED AND ENVIRONMENTAL CONTEXT (ENVIRONMENT, PHYSICAL, CLIMATE, SOCIAL, THREATENED AND ENDANGERED SPECIES)

The activity’s approach calls for interventions at the community and national levels. Ecologically, the project will focus on Liberia’s forest ecosystems. Specifically, CWA will target the Krahn-Bass PPA, Cesto-Senkwen PPA, River Ghee PPA, and the East Nimba Nature Reserve (ENNR) PA landscapes. Other PPAs and PA landscapes may be added as plans develop.

Overview

Liberia is home to approximately 4.3 million hectares of tropical forest, including 40 percent of the remaining Upper Guinean Rainforest. As of 2015, tropical forests occupied about 6.5 million hectares, 68 percent of Liberia’s land surface. In addition to intact tropical forests, Liberia’s forest cover includes tree crops (palm oil, rubber, and cocoa) and about 975,000 hectares of degraded forest.

Liberia’s natural forests are rich in biodiversity, with concentrations of endemic, threatened, and endangered species. Iconic species such as the Western chimpanzee, forest elephant, and pygmy hippopotamus garner attention, but more than 2,000 vascular plant species, 140 mammal species, 600 bird species, and 75 species of reptiles and amphibians inhabit Liberia. The International Union for Conservation of Nature lists eighty-nine Liberian species as threatened or endangered. New species of trees, arthropods, mammals, and amphibians have recently been described.

The forest ecosystems of Liberia are great assets to the country. However, these assets are not managed sustainably, and threats abound. Liberia lost 1.53 million hectares (ha) of tree cover from 2001 to 2018. Slash and burn agriculture, logging, and the postwar revival of large-scale agroforestry, and mining have resulted in the conversion of dense forest to degraded forest, agricultural land, and thickets. Additionally, hunting for bushmeat and other wildlife products has decimated populations of terrestrial species.

Poverty, corruption, weak capacity, and lack of political will compound threats to biodiversity. Rural Liberians subsist on approximately one USD per day and rural communities suffer from growing food insecurity. Economic opportunities are limited throughout the country and scarce in rural regions. The Government of Liberia (GOL) generally lacks the resources necessary to implement effective conservation programs. The Forest Development Authority (FDA) is underfunded and this limits the FDA's ability to fully carry out its mission.

2.2 APPLICABLE AND APPROPRIATE PARTNER COUNTRY AND OTHER INTERNATIONAL STANDARDS (E.G. WHO), ENVIRONMENTAL AND SOCIAL LAWS, POLICIES, AND REGULATIONS

Liberia has legislation, regulations, and policies aimed at natural resource governance and forest conservation, but GOL agencies are under-resourced and lack technical capacity to monitor and enforce those established laws, regulations, and policies. Poor integration of government structures at a variety of levels—regional, national and local— often leads to confusing and contradictory policies, which acts as a disincentive for people to invest in improved resource management.

Key laws governing forest and biodiversity conservation are:

- 2006 National Forestry Reform Law
- 2016 National Wildlife and Conservation and Protected Area Management Law
- Land Rights Act of 2018

3.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL RISK

ACTIVITY 1: Increase the number of Proposed Protected Areas (PPA) that are legally recognized as PAs. (IR 1)

TABLE 2A. POTENTIAL IMPACTS – ACTIVITY 1

Activity	Potential environmental and social impacts
Policy and Governance Interventions	
Create a national plan for gazettment of all PPAs	This intervention will focus on supporting FDA and other stakeholders to create a national plan that clearly describes the steps necessary, resources required, and timeline for gazettment of PPAs. <i>No significant potential adverse environmental impacts anticipated.</i>
Capacity Building Interventions	
Training and mentoring for officials of the Forestry Development Authority (FDA) to help standardize and improve the quality and efficiency of the gazettment process.	The focus of this intervention will be training and capacity building for the FDA with the goal of improving the quality and efficiency of the gazettment process. <i>No significant potential adverse environmental impacts anticipated.</i>
Training and other capacity building interventions to improve forest communities' understanding of and participation in the gazettment process.	The focus of this intervention will be training and capacity building for forest communities. This training will improve their understanding of the process and potential outcomes of the gazettment process. <i>No significant adverse environmental impacts anticipated.</i>
Gazettment Support Interventions	
Provide direct support, in partnership with the FDA, to advance gazettment for PPAs.	The objective of this intervention is to prepare gazettment packages that will be reviewed and approved by the Legislature and President. <i>No significant adverse environmental impacts are anticipated.</i>
Support community and PPA boundary line determination, mapping, and demarcation.	This intervention will focus on establishing the boundaries of PPAs, through a consultative process, and mapping and marking those boundaries. <i>Minor adverse environmental impacts are anticipated, such as cutting of brush and small trees in very limited areas to facilitate mapping and boundary line demarcation.</i>
Support ecological surveys of PPAs.	This intervention will focus on quantitative and qualitative ecological studies of PPAs. The results of these studies will be used to support gazettment and improve conservation strategies. <i>No significant adverse environmental impacts anticipated.</i>
Support all Free, Prior, and Informed Consent (FPIC) interventions to ensure that communities have been fully informed and consent to creation of new PAs.	The focus of this intervention will be helping to ensure communities fully understand the gazettment process and potential results of the establishment of new PAs. This intervention is intended to prevent negative social impacts and ensure communities support new PAs. <i>No significant adverse environmental impacts anticipated.</i>

ACTIVITY 2: Improve protection and management of target PPA and PA landscapes at the local and national level. (IR2)

TABLE 2B. POTENTIAL IMPACTS – ACTIVITY 2

Activity	Potential environmental and social impacts
Improve FDA capacity to manage PPA and PA landscapes.	No significant adverse environmental impacts anticipated.
Improve FDA capacity to enforce applicable conservation laws, regulations, and policies governing PPA and PA landscapes.	No significant adverse environmental impacts anticipated.
Increase community level understanding of conservation principles and incentivize them to improve conservation of forest resources in PPA and PA landscapes.	No significant adverse environmental impacts anticipated.
Empower communities to advocate for biodiversity conservation and incentivize them to do so. These incentives could include the potential for economic growth from ecotourism; potential employment opportunities as park rangers or forest guards; and/or the threat of cultural association with the forest.	No significant adverse environmental impacts anticipated.
Identify and implement best practices for community conservation and management.	No significant adverse environmental impacts anticipated.
Form hubs or multi-community groups to improve communication between communities and increase power to advocate at the local and national level.	No significant adverse environmental impacts anticipated.
Improve capacity for data and research in forest ecosystems.	No significant adverse environmental impacts anticipated.

ACTIVITY 3: Increase prosperity and prospects for communities living around protected areas. (IR3)

TABLE 2C. POTENTIAL IMPACTS – ACTIVITY 3

Activity	Potential environmental and social impacts
Through community consultations, identify potential livelihood interventions that could effectively improve income, economic security, and food security for forest communities.	Potential Agricultural Impacts • Harvest of Non-Timber Forest Products (NTFP) could lead to decline of species producing these products and reduction of food sources for wildlife. • Agricultural expansion which could lead to further degradation of natural forests, which is a particular concern in West Africa as agriculture is one of the principal driving factors of deforestation. Deforestation can displace wildlife and livelihoods dependent on forest resources, contribute to local erosion and sedimentation of watercourses, as well as contribute to greenhouse gas emissions. • Intensive mono-cultivation without incorporating crop rotation, fallow periods or intercropping has contributed to the degradation of agricultural lands in Liberia. Mono-
Provide technical assistance and capacity building for new livelihood interventions.	
Promote sustainable agricultural systems that increase dietary diversity and discourage shifting agricultural practices.	
Provide tools and inputs to support	

livelihoods interventions.	cultivation of some key crops has demonstrated decreased yields as opposed to when these crops are grown in intercropping systems. • Inappropriate selection of tree varieties to be promoted can lead to biodiversity loss, especially when new varieties are introduced that compete or inhibit local varieties from flourishing. Exotic species can be invasive and can also spread disease. • While Conservation Works is not providing pesticide assistance (procurement and/or use of pesticides) or fertilizers, agricultural support programming can indirectly lead to the use of chemical-based and bio-pesticides and fertilizers, which can cause a range of environmental and human health impacts. In addition to water and soil pollution, they can be responsible for disruption of natural controls, creating pesticide resistance, pest resurgence, killing of non-target organisms, and direct impacts upon the health of pesticide handlers, users and downstream residents. Likewise, excessive or inappropriate application of chemical fertilizers can lead to pollution of drinking water, natural watercourses and thereby generate impacts upon fragile freshwater ecosystems resulting from eutrophication and algal blooms. • More information on negative impacts associated with agricultural production is compiled in the USAID Sector Environmental Guidelines: Dryland Agriculture and Crop Production found at https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources#cp. Potential Community-Based Natural Resource Management Impacts: • Continuing population growth near or within protected areas and immigration of people seeking to benefit from CBNRM income - Population growth rates of 3 percent or more are not uncommon in CBNRM areas. These rates may be unsustainable over the long term, with increasing cumulative impacts on ecosystems and the physical environment. The creation of new infrastructure (schools, roads, health posts, market centers) may encourage an expansion of population in the CBNRM area, with increased stress on the resource base and ecological function. In situations where CBNRM produces significant community benefits, there may be population movements into the area by extended family members and other individuals who become aware of the relative improvement in economic conditions. Over the long term this immigration, combined with increased population growth, could undo resource management efforts. This is perhaps the most serious long-term issue confronting CBNRM sustainability. • Inadequate community experience managing funds generated through CBNRM - Embezzlement and mismanagement of CBNRM income are risks that project managers have not yet fully addressed. When CBNRM works, communities may suddenly find themselves in
Improve forest community access to markets.	
Create enterprise groups to increase negotiation power and market share. Introduce and develop village savings and loan associations.	

	possession of much larger sums of money than they have handled in the past. The community may have no experience managing such sums, or have little capacity to do so. These sums can be exceptionally large relative to the average income of community members. The temptation to embezzle is therefore large for anyone given exclusive control over some or all of these funds. The absence of experience managing money often makes theft easier. When community money is stolen it undermines confidence in the CBNRM system. • More information on negative impacts associated with CBNRM is compiled in the USAID Sector Environmental Guidelines: CBNRM found at https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/seg-cbnrm/pdf Potential Ecotourism Impacts: • May exceed limits of acceptable use (LAUs) for the protected area • Cause loss of tropical forest • Result in loss of habitat necessary for maintenance of biodiversity • Adversely affect threatened or endangered species • May lead to construction which could ◦ Result in poor siting of infrastructure, roads, etc. ◦ Damage viewsheds and general visual appeal • Cause excessive water consumption, competing with needs of fauna and flora in protected areas, especially in semi-arid and arid climates • Fail to generate enough revenues for sustainable operation • More information on negative impacts associated with Ecotourism is compiled in the USAID Sector Environmental Guidelines: Ecotourism found at https://www.usaid.gov/sites/default/files/documents/1860/SectorEnvironmentalGuidelines_Ecotourism_2009.pdf
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ACTIVITY 4: Increase economic growth by supporting conservation-compatible investment. (IR4)

TABLE 2D. POTENTIAL IMPACTS – ACTIVITY 4

Activity	Potential environmental and social impacts
Improve networking and coordination within the private sector and between the private sector and the GOL.	These interventions have the potential to increase commerce and development in forest landscapes and other sensitive and non-sensitive areas of Liberia. The effects, particularly the intended consequences, may be far reaching. These could include: • Clearing of small sites in forest for tourist infrastructure to be built by beneficiaries (not by USAID). • Increased human presence in forest areas that degrades sensitive habitats with foot traffic, garbage, human waste, etc... • Shifts in employment and business patterns that may alter existing social and cultural structures and norms.
Support national and international marketing campaigns to promote sustainable ecotourism in Liberia.	
Provide technical assistance to conservation enterprises.	
Provide matching investments to conservation enterprises.	
Support capacity building and	

workforce development programs for workers in conservation enterprises.	
Support small scale construction such as trails, signs, benches, and palava huts.	ADD DETAILS PER NOTE....Below has been moved to section 5.3. Construction will utilize local materials and labor. Trails will be built following USFS trail building guidelines (https://www.fs.usda.gov/managing-land/trails/trail-management-tools/trailplans) All construction will be designed and sited to avoid ecologically and/or culturally sensitive areas. Construction plans will call for minimal cutting of vegetation, especially canopy trees, fruit trees, and species known to host threatened species. Construction will be designed, when appropriate, to blend into local ecosystems.

4.0 ENVIRONMENTAL DETERMINATIONS

4.1 RECOMMENDED ENVIRONMENTAL DETERMINATIONS

The following table summarizes the recommended determinations based on the environmental analysis conducted. Upon approval, these determinations become affirmed, per 22 CFR 216. Specified conditions, detailed in Section 5, become mandatory obligations of implementation, per ADS 204.

TABLE 3 : ENVIRONMENTAL DETERMINATIONS

Activities	Categorical Exclusion Citation (if applicable)	Negative Determination with condition	Positive Determination ²	Deferral ³
Increase the number of Proposed Protected Areas (PPA) that are legally recognized as PAs. (IR 1)				
Policy and Governance Interventions				
Create a national plan for gazettment of all PPAs	☒	☐	☐	☐
Capacity Building Interventions				
Training and mentoring for officials of the Forestry Development Authority (FDA) to help standardize and improve the quality and efficiency of the gazettment process.	☒	☐	☐	☐
Training and other capacity building interventions to improve forest communities' understanding of and participation in the gazettment process.	☒	☐	☐	☐
Gazettment Support Interventions				
Provide direct support, in partnership with the FDA, to advance gazettment for PPAs.	☒	☐	☐	☐
Support community and PPA boundary line determination, mapping, and demarcation.	☒	☐	☐	☐
Support ecological surveys of PPAs.	☒	☐	☐	☐
Support all Free, Prior, and Informed Consent (FPIC) interventions to ensure that communities have been fully informed and consent to creation of new PAs.	☒	☐	☐	☐
Improve protection and management of target PPA and PA landscapes at the local and national level. (IR2)				
Improve FDA capacity to manage PPA and PA landscapes.	☒	☐	☐	☐

² Positive Determinations require preparation of a Scoping Statement and Environmental Assessment.

³ Deferrals must be cleared through an Amendment to this IEE prior to implementation of any deferred activities.

Improve FDA capacity to enforce applicable laws, regulations, and policies governing PPA and PA landscapes.	☒	☐	☐	☐
Increase community level understanding of conservation principles and incentivize them to improve conservation of forest resources in PPA and PA landscapes.	☒	☐	☐	☐
Empower communities to advocate for biodiversity conservation and incentivize them to do so.	☒	☐	☐	☐
Identify and implement best practices for community conservation and management.	☒	☐	☐	☐
Form hubs or multi-community groups to improve communication between communities and increase power to advocate at the local and national level.	☒	☐	☐	☐
Improve capacity for data and research in forest ecosystems.	☒	☐	☐	☐

Increase prosperity and prospects for communities living around protected areas. (IR3)

Through community consultations, identify potential livelihood interventions that could effectively improve income, economic security, and food security for forest communities.	☐	☒	☐	☐
Provide technical assistance and capacity building for new livelihood interventions.	☐	☒	☐	☐
Promote sustainable agricultural systems that increase dietary diversity and discourage shifting agricultural practices.	☐	☒	☐	☐
Provide tools and inputs to support livelihoods new interventions.	☐	☒	☐	☐
Improve forest community access to markets.	☐	☒	☐	☐
Create enterprise groups to increase negotiation power and market share.	☐	☒	☐	☐
Introduce and develop village savings and loan associations.	☐	☒	☐	☐

Increase economic growth by supporting conservation-compatible investment. (IR4)

Improve networking and coordination within the private sector and between the private sector and the GOL.	☐	☒	☐	☐
Support national and international marketing campaigns to promote sustainable ecotourism in Liberia.	☐	☒	☐	☐
Provide technical assistance to conservation enterprises.	☐	☒	☐	☐

Provide matching investments to conservation enterprises.	☐	☒	☐	☐
Support capacity building and workforce development programs for workers in conservation enterprises.	☐	☒	☐	☐
Support small scale construction such as trails, signs, benches, and palava huts.	☐	☒	☐	☐

4.2 CLIMATE RISK MANAGEMENT (CRM)

This section summarizes the methodology used and findings of the CRM Screening, in accordance with ADS 201mal. The activity design team, in consultation with the climate integration lead (CIL), considered the potential effect of climate risks/stressors on the sustainability of the activity (changing precipitation patterns, rising temperature, floods, droughts, fires, landslides, etc.) in addition to the impact of activities on the climate (increased greenhouse gas emissions, land use changes, etc.). See table 5 for the complete CRM table. The climate risk screening matrix shall be shared with the implementing partner (IP). The IP must include climate risks/adaptation and opportunities in the IP work plan as needed.

5.0 CONDITIONS AND MITIGATION MEASURES

5.1 CONDITIONS

The environmental determinations in this IEE are contingent upon full implementation of the following general implementation and monitoring requirements, as well as ADS 204 and other relevant requirements.

5.1.1 During Pre-Award:

- 5.1.1.1 Pre-Award Briefings: As feasible, the design team and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide a pre-award briefing for potential offerors on environmental compliance expectations/responsibilities at bidders' conferences.
- 5.1.1.2 Solicitations: The design team, in coordination with the A/CO, will ensure solicitations include environmental compliance requirements and evaluation criteria. A/CO will ensure technical and cost proposal requirements include approach, staffing, and budget sufficient for complying with the terms of this IEE.
- 5.1.1.3 Awards: The A/COR, in coordination with the A/CO, will ensure all awards and sub-awards, include environmental compliance requirements.

5.1.2 During Post-Award:

- 5.1.2.1 Post-Award Briefings: The A/COR and/or the cognizant environmental officer(s) (e.g., MEO, REA, BEO) will provide post-award briefings for the IP on environmental compliance responsibilities.
- 5.1.2.3 Workplans and Budgeting: The A/COR will ensure the IP integrates environmental compliance requirements in work plans and budgets to comply with requirements, including EMMP implementation and monitoring.
- 5.1.2.4 Staffing: The A/COR, in coordination with the IP, will ensure all awards have staffing capacity to implement environmental compliance requirements.
- 5.1.2.5 Records Management: The A/COR will maintain environmental compliance documents in the official activity file and upload records to the designated USAID environmental compliance database system.
- 5.1.2.6 Host Country Environmental Compliance: The A/COR will ensure the IP complies with applicable and appropriate host country environmental requirements unless otherwise directed in writing by USAID. However, in the case of a conflict between the host country and USAID requirements, the more stringent shall govern.
- 5.1.2.7 Work Plan Review: The A/COR will ensure the IP verifies, at least annually or when activities are added or modified, that activities remain within the scope of the IEE. Activities outside of the scope of the IEE cannot be implemented until the IEE is amended.

- 5.1.2.8 IEE Amendment: If new activities are introduced or other changes to the scope of this IEE occur, an IEE Amendment will be required.
- 5.1.2.14 USAID Monitoring Oversight: The A/COR or designee, with the support of the cognizant environmental officer(s) (e.g., MEO, REA, BEO), will ensure monitoring of compliance with established requirements (e.g., by desktop reviews, site visits, photographs, virtual meetings, etc.).
- 5.1.2.16 Environmental Compliance Mitigation and Monitoring Plan: The A/COR will ensure the IP develops, obtains approval for, and implements Environmental Mitigation and Monitoring Plans (EMMPs) that are responsive to the stipulated environmental compliance requirements.
- 5.1.2.17 Environmental Compliance Reporting: The A/COR will ensure the IP includes environmental compliance in regular activity reports, using indicators as appropriate; develops and submits the Environmental Mitigation and Monitoring Reports (EMMRs); and completes and submits a Record of Compliance (RoC) describing their implementation of EMMP requirements in conjunction with the final EMMR or at the close of sub activities (as applicable). And where required by Bureaus or Missions, ensure the IP prepares a closeout plan consistent with contract documentation for A/COR review and approval that outlines responsibilities for end-of-project operation, the transition of other operational responsibilities, and final EMMR with lessons learned.
- 5.1.2.18 Corrective Action: When noncompliance or unforeseen impacts are identified, IPs notify the A/COR, place a hold on activities, take corrective action, and report on the effectiveness of corrective actions. The A/COR initiates the corrective action process and ensures the IP completes and documents their activities. Where required by Bureaus or Missions, ensure Record of Compliance is completed.

5.2 AGENCY CONDITIONS

- 5.2.1 Sub-award Screening: The A/COR will ensure the IP uses an adequate environmental screening tool to screen any sub-award applications and to aid in the development of EMMPs.
- 5.2.2 Programmatic IEEs (PIEE): PIEEs stipulate requirements for additional environmental examination of new or country specific activities. The A/COR of any activity being implemented under a PIEE will ensure appropriate reviews are conducted, typically through a Supplemental IEE, and approved by the cognizant BEO.
- 5.2.3 Supplemental IEEs (SIEEs): An SIEE will be prepared for any new activity being planned which falls under a PIEE. The SIEE will provide more thorough analysis of the planned activities, additional geographic context and baseline conditions as well as specific mitigation and monitoring requirements.
- 5.2.4 Other Supplemental Analyses: The A/COR will ensure supplemental environmental analyses that are called for in the IEE are completed and documented.

- 5.2.5 Resolution of Deferrals: If a deferral of the environmental threshold determination was issued, the A/COR will ensure that the appropriate 22CFR216 environmental analysis and documentation is completed and approved by the BEO before the subject activities are implemented.
- 5.2.6 Positive Determination: If a Positive Determination threshold determination was made, the A/COR will ensure a Scoping Statement, and if required an Environmental Assessment (EA), is completed and approved by the BEO before the subject activities are implemented.
- 5.2.7 Compliance with human subject research requirements: The Activity Manager, A/COR shall assure that the IP and sub-awardees, -grantees, and -contractors demonstrate completion of all requirements for ethics review and adequate medical monitoring of human subjects who participate in research trials carried out through this IEE and ensure appropriate records are maintained. All documentation demonstrating completion of required review and approval of human subject trials must be in place prior to initiating any trials and cover the period of performance of the trial as described in the research protocol.

5.3 MITIGATION MEASURES

The mitigation measures presented in this section constitute the minimum required based on available information at the time of this IEE and the environmental analysis in Section 4. These measures shall provide general direction for completing the activity EMMP and/or the EA and Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP), if required.

ACTIVITY 1: DEFORESTATION, DEGRADATION, AND BIODIVERSITY LOSS REDUCED IN TRANSBOUNDARY FOREST LANDSCAPES

TABLE 4A. SUMMARY OF MITIGATION MEASURES

Activity	Mitigation Measure(s)
Increase the number of Proposed Protected Areas (PPA) that are legally recognized as PAs. (IR 1)	No mitigation measures necessary.
Improve protection and management of target PPA and PA landscapes at the local and national level. (IR2)	No mitigation measures necessary.
Increase prosperity and prospects for communities living around protected areas. (IR3)	
Demonstrate a replicable system for achieving community-led, cross-disciplinary, regional action	
Through community consultations, identify potential livelihood interventions that could	Agriculture Incorporate and promote sound environmental management practices (see guidance on such practices in USAID Sector

effectively improve income, economic security, and food security for forest communities.	Environmental Guideline: Dryland Agriculture, Crop Production and Forestry found at https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/sector-environmental-guidelines-resources#cp); ● Convey appropriate environmental requirements pertaining to these operations when appropriate; ● Ensure that sensitive natural resources or ecosystems are protected from conversion to agricultural or livestock land uses; ● Ensuring that farmers perform required maintenance and protect the saplings, nurseries, and reforested areas from grazing animals and fire where appropriate; ● Avoid the introduction of exotic species. A qualified agronomist or biologist should assist in the selection of appropriate tree species to promote, in order to avoid creating problems with invasive species; ● Establish a monitor and control committee to care for reforested areas, in particular to avoid fuel wood harvest or destruction of reforested areas; and ● Promote sustainable harvest of NTFP by training communities in sustainable harvest methods, introducing minimally destructive harvest techniques, and monitoring offtake. ● Wherever feasible, select native species that are well suited to future projected climate regimes in the region. ● No procurement or use of pesticides is authorized with USAID funds without first complying with the pesticide procedures set forth in 22 CFR 216. Any use of pesticides will require an approved Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP). CBNRM ● Incorporate and promote sound environmental management practices (see guidance on such practices in USAID Sector Environmental Guideline: CBNRM https://www.usaid.gov/sites/default/files/documents/1860/SectorEnvironmentalGuidelines_CBNRM_2003.pdf) ● Prepare long-term regional environmental action plans or regional environmental impact assessments (EIAs), and set “limits for acceptable use” and human carrying capacity, with full participation from affected stakeholders. Establish a system of permits, deeds or licenses for existing residents, which can be transferred or sold to outsiders. Provide families with incentives to limit family size and discourage additional in-migration. Closely link primary education, health and family planning services to income-generating CBNRM initiatives. In developing CBNRM plans, use zoning strategies to reduce potential adverse impacts of infrastructure development on sensitive areas or sites of exceptional value. Where possible, consider siting new infrastructure well away from sites of exceptional value, so as to encourage community relocation to less sensitive areas. ● Some CBNRM communities have received assistance in building their own capacity to manage money or to set up protocols that prevent any single individual from having control of large sums. In many cases guidance and training in secure financial management is still needed. Ecotourism ● Incorporate and promote sound environmental management
Provide technical assistance and capacity building for new livelihood interventions.	
Promote sustainable agricultural systems that increase dietary diversity and discourage shifting agricultural practices.	
Provide tools and inputs to support livelihoods new interventions.	
Improve forest community access to markets.	
Create enterprise groups to increase negotiation power and market share.	
Introduce and develop village savings and loan associations.	

	practices (see guidance on such practices in USAID Sector Environmental Guideline: Ecotourism at https://www.usaid.gov/sites/default/files/documents/1860/SectorEnvironmentalGuidelines_Ecotourism_2009.pdf) • Carry out environmental assessments (EAs) or detailed mitigation strategies to avoid or mitigate adverse impacts on tropical forest, biodiversity and/or threatened and endangered species • Use a multidisciplinary team—e.g., hydrologist, geotechnical engineer, soil scientist, ecologist, tourism specialist—to determine the nature of proposed infrastructure and potential site locations (e.g., buildings roads, camp sites, observation points, etc.). (See the Sectoral Environmental Guidelines on Construction https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/seg-construction/pdf and Rural Roads https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/seg-rural-roads/pdf) • Estimate water demands for all future uses in p • roTECTED areas. Develop surface and groundwater budgets based on historical meteorological and precipitation records and assessments of groundwater flows. Select waterconserving and water-purifying technologies. See the “Water Supply and Sanitation Sectoral Environmental Guidelines https://www.usaid.gov/environmental-procedures/sectoral-environmental-social-best-practices/seg-water-supply/pdf • Emphasize high-value, low-impact tourism with fee and lodging cost structures set to provide for sustainable management.
Increase economic growth by supporting conservation-compatible investment. (IR4)	
Improve networking and coordination within the private sector and between the private sector and the GOL.	• Private sector partnerships will incorporate as a core value the fostering of an environmentally sound/sustainable agribusiness and agricultural sector, and that this value be fully mainstreamed and integrated in programming and activities. • Support for ecotourism and conservation enterprises will be limited to enterprises that demonstrate a capacity and willingness to support biodiversity conservation.
Support national and international marketing campaigns to promote sustainable ecotourism in Liberia.	
Provide technical assistance to conservation enterprises.	
Provide matching investments to conservation enterprises.	
Support capacity building and workforce development programs for workers in conservation enterprises.	
Support small scale construction of trails, signs, benches, and palava huts.	The activities shall be designed and implemented using the principles and good construction practices provided in USAID’s Sector Environmental Guidelines for Small-Scale Construction https://www.usaid.gov/sites/default/files/documents/1860/SectorEnvironmentalGuidelines_Construction_2017.pdf Construction will utilize local materials from renewable resources. Labor will come from local communities.

Trails will be built following USFS trail building guidelines (https://www.fs.usda.gov/managing-land/trails/trail-management-tools/trailplans) All construction will be designed and sited to avoid ecologically and/or culturally sensitive areas. Construction plans will call for minimal cutting of vegetation, especially canopy trees, fruit trees, and species known to host threatened species. Construction will be designed, when appropriate, to blend into local ecosystems.

6.0 LIMITATIONS OF THIS INITIAL ENVIRONMENTAL EXAMINATION

The determinations recommended in this document apply only to activities and sub-activities described herein. Other activities that may arise must be documented in either a separate IEE, an IEE amendment if the activities are within the same activity, or other type of environmental compliance document and shall be subject to an environmental analysis within the appropriate documents listed above.

Other than activities determined to have a Positive Threshold Determination, it is confirmed that the activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22 CFR 216.2(d).

In addition, other than activities determined to have a Positive Threshold Determination and/or a pesticide management plan (PERSUAP), it is confirmed that the activities described herein do not involve any actions listed below. **Any of the following actions would require additional environmental analyses and environmental determinations:**

- Support project preparation, project feasibility studies, or engineering design for activities listed in §216.2(d)(1);
- Affect endangered and threatened species or their critical habitats per §216.5, FAA 118, FAA 119;
- Provide support to extractive industries (e.g. mining and quarrying) per FAA 117;
- Promote timber harvesting per FAA 117 and 118;
- Lead to new construction, reconstruction, rehabilitation, or renovation work per §216.2(b)(1);
- Support agro-processing or industrial enterprises per §216.1(b)(4);
- Provide support for regulatory permitting per §216.1(b)(2);
- Lead to privatization of industrial facilities or infrastructure with heavily polluted property per §216.1(b)(4);
- Research, testing, or use of genetically engineered organisms per §216.1(b)(1), ADS 211; and
- Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, clean-up of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials. Pesticides cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act per §216.2(e) and §216.3(b).

7.0 REVISIONS

Per 22 CFR 216.3(a)(9), when ongoing programs are revised to incorporate a change in scope or nature, a determination will be made as to whether such change may have an environmental impact not previously assessed. If so, this IEE will be amended to cover the changes. Per ADS 204, it is the responsibility of the USAID A/COR to keep the MEO/REA and BEO informed of any new information or changes in the activity that might require revision of this environmental analysis and environmental determination.

Table 5. Project Climate Risk Management Summary Table

Defined or Anticipated Project Elements (Purpose/Sub-purpose, Area of Focus, or Activity/Mechanism, etc.)	Climate Risks List key risks related to the project elements identified through either the strategy- or project-level climate risk assessment.	Risk Rating Low/ Moderate/ High	How Risks are Addressed at Project Level Describe how risks have been addressed at the project level. If a decision has been made to accept the risk, briefly explain why.	Further Analysis and Actions for Activity Design/ Implementation Describe CRM measures to be integrated into activity design or implementation, including additional analysis, if applicable.	Opportunities to Strengthen Climate Resilience Describe opportunities to achieve development objectives by integrating climate resilience or mitigation measures.
Increase prosperity and prospects for communities living around protected areas. (IR3)	Livelihoods could be impacted by increase in temperature and/or changes in rainfall patterns.	Moderate	Risks are only addressed at the activity level, not at the project level.	Introduce climate smart agricultural practices to reduce the potential impact of climate change. Build community capacity to absorb and adapt to potential effects of climate change.	Introduce a mix of sustainable livelihoods that increases resilience and reduces the impact of potential climate change.
Increase economic growth by supporting conservation-compatible	Conservation enterprises could be negatively impacted if rainfall	Moderate	Risks are only addressed at the activity level, not at the project level.	Work with conservation enterprises to develop a diverse portfolio of	

e investmen t. (IR4)	patterns or temperature change substantially. Raw materials for conservation enterprises could become unavailable with changes in rainfall patterns or temperature. Ecotourism destinations may deteriorate or become unreachable with changes in rainfall or temperature.			goods and services to increase climate resilience. Support development of adaptive and agile business models that allow enterprises to pivot if climate related vulnerabilities impact revenue.	
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