



Supplemental Initial Environmental Examinations (IEE)

US Agency for International Development (USAID)
USAID/Moldova
Supplemental Initial Environmental Examination (IEE)

Program/Project/Activity Data

Activity/Project Name:	Comunitatea Mea (My Community)	
Assistance Objective:	More Effective and Accountable Democratic Governance	
Program Area:	Good Governance	
Country(ies) and/or Operating Unit:	Moldova	
Originating Office:	Moldova/DG	Date: April 18, 2017
PAD Level IEE: Yes ☐ No ☒	DCN of Original RCE/IEE:	DCN:2016-MOL-005
Supplemental IEE: Yes ☒ No ☐	DCN of Amendment(s):	N/A
RCE/IEE Amendment: Yes ☐ No ☒		
If Yes, Purpose of Amendment (AMD):	N/A	
DCN(s) of All Related EA/IEE/RCE/ER(s):	N/A	
Implementation Start/End:		LOP: FY'18-FY '22
Funding Amount:	AMD Amount:	LOP Amount: \$20,401,045
Contract/Award Number (if known):	N/A	
Recommended Environmental Determination:		
Categorical Exclusion: ☒	Positive Determination: ☐	
Negative Determination: ☒	Deferral: ☐	
Additional Elements:		
Conditions: ☒	Local Procurement: ☐	
Government to Government: ☐	Donor Co-Funded: ☐	
Sustainability Analysis (included): ☐	Climate Change Vulnerability Analysis (included): ☐	

1. Background and Project Description

- 1.1. Purpose and Scope of IEE: This IEE has been prepared as a Supplemental IEE to the Accountability in Moldova (AIM) IEE, DCN: 2016-MOL-005, now that project activities have been defined. The Supplemental IEE covers the activities of Comunitatea Mea which falls under the Accountability in Moldova (AIM) project and linked to the Moldova Country Development Cooperation Strategy (CDCS). The Supplemental IEE reviews the Comunitatea Mea activity elements to ensure they meet the requirements for Categorical Exclusion and Negative Determination with Conditions under which the AIM PAD operates.
- 1.2. Project Overview: Comunitatea Mea is a five-year activity that aims to strengthen local government to become more effective, transparent and accountable to citizens. This activity will strive to build local government's capacity to meet citizens' needs. By increasing the capacity of local authorities, including their ability to work inclusively with citizens and civil society, not only services will be improved but checks and balances between the central and local governments will be strengthened.
- 1.3. Project Description: Comunitatea Mea will serve as USAID's flagship local government activity to provide comprehensive assistance to communities, including towns and villages, primarily targeting

local self-government bodies. The principal beneficiaries will be the first level of local public administrations, civic groups and local businesses that, in collaboration, will be develop their communities and improve public services.

- 1.3.1. *Component 1 – Improving quality of and access to municipal services (65%, including infrastructure projects):* This component targets local authorities to improve their capacity to plan for, manage and deliver better quality and affordable basic services, such as clean potable water and sanitation, waste collection and management, transportation, street lighting, green space management, and social services and the implementer will work with the communities to ensure that they have the capabilities to properly manage the project. The end result should include the realization of service delivery and infrastructure project that meet community priority needs. The activity will cooperate with GIZ to develop, where possible, linkages with GIZ's projects and consider regional approaches to municipal services. In identifying services to focus on, Comunitatea Mea will provide assistance for an inclusive process of strategic and urban planning, involving local government officials, civil society and the local business community. The use of technical innovations and digital solutions should be encouraged. Infrastructure projects should consider energy efficiency technologies in order to decrease the heavy burden of energy costs on local budgets. Communities will be providing a cost-share for infrastructure projects.
- 1.3.2. *Component 2 – Citizens meaningfully engaged in local governance (10%):* Component 2 aims to institutionalize meaningful citizen engagement in local-government decision making. Activities will expand citizen participation and public engagement at the local level to achieve greater transparency in the public decision making process. Activities will build the capacity of local public administrations to use effective transparency tools and institutionalize systems to keep citizens informed on the availability and use of resources. Through this component, citizens will engage in planning, tariff setting, and customer satisfaction surveys. This will require working with local governments (including mayors, councilors and staff) as well as civil society, civic groups and representatives of local businesses. Support will be provided to communities to implement innovative transparency tools and to monitor the activities of local governments.
- 1.3.3. *Component 3 – Decentralization Policy Reforms Advanced (10%):* Component 3 supports the development of a sustainable reform environment that enable local government officials, think tanks, local associations, and the central government pursue the decentralization reform agenda. Component 3 strengthens coordination and coalition-building among stakeholders (citizens, CSOs, Mayor's Association, Local Councils, others) to develop policy and budget proposals and advocate for strengthening local government's financial viability and responsibility, particularly vis-a-vis local-source revenue such as real property and land taxes, as well as more equitable arrangements for shared taxes (shared between local and central government). In addition, this component will support CSOs to conduct monitoring and oversight of the Government of Moldova's progress on implementing the reforms.
- 1.3.4. *Component 4 – Increased locally-owned revenues and improved financial management practices. (15%):* Component 4 will address the fundamental barriers to empowering local self-government – that is the mismatch between local government responsibility, capacity, and resources. It is envisioned that the project will start with technical assistance and training under all components and then reward the best performing municipalities with infrastructure projects in the second year of implementation. This component will improve local revenue and transparent financial management, while at the same time advancing decentralization reforms to ensure efficient and accountable system of local government. This will ensure that local governments have enough resources, local powers and

accountability to more effectively address the needs of citizens. In addition, component 4 will address barriers, such as the lack of national and local systems for implementing effective property management, as land management is an important revenue source for local governments. Component 4 will also address the financial viability of service provision at the local level through better cost allocation; increased revenue collection through improved billing and collection operations; and reduced costs through greater efficiency in service delivery and energy consumption.

Comunitatea Mea will implement a variety of interventions based on needs assessment of local self-government bodies and needs identified through consultations with citizens, such as:

- Provide technical assistance through international and local experts;
- Provide training to local administrations to improve financial management and provide better services;
- Trainings will also provide an opportunity for large and small communities to network and share experiences;
- Develop innovative e-governance tools to promote efficiency and transparency, as well as internal ICT systems that increase productivity;
- Facilitate domestic peer exchanges to share best practices in service delivery and financial management;
- Co-finance community infrastructure improvements;
- Delivery of equipment to improve municipal services;
- Provide technical assistance for feasibility studies, engineering studies, environmental studies related to infrastructure projects to ensure technical soundness and sustainability of projects;
- Providing technical assistance to municipalities to help them develop specifications for contracting;
- Provide grants to civil society organizations to monitor the reforms and hold local and central government accountable.

The scope and services under Comunitatea Mea will be limited to infrastructure improvements that do not trigger a positive determination per 22CFR216. Illustrative distinctions of size and scope are:

- improved services such as waste collection would be in the scope but not development of a landfill;
- replacement of water piping for drinking water but not developing a new water supply;
- replacement of wastewater pipes and refurbish existing systems but not construction of new system;
- simple expansion of electrical supply with transformers and projects consistent with this level of development such as new LED streetlights; and
- sidewalks and roads with sustainable stormwater drainage (infiltrate water locally instead of sending it to a river).

If any of the infrastructure projects will trigger a positive determination resulting from ERC/EMMP analysis, the Implementing Partner will proactively consult the Bureau Environmental Officer to get input on the environmental determination and, upon determination, will conduct an Environmental Assessment per 22CFR216

2. Baseline Environmental Information

2.1. Locations Affected and Environmental Context:

Moldova has an area of 33,843 square km and a population of 3,559,500 people (2012 estimate). It is located at the intersection of three bio-geographic zones: the Central-European zone, the Euro-Asiatic zone, and the Mediterranean zone. Many species typical for each of these zones are at the limit of their natural range in Moldova. The country has a rich biota relative to its size, considering that the highest elevation point is only 430 m above the sea level. Today, natural ecosystems occupy approximately 10 percent of Moldova. A significant proportion of this area is highly degraded. Agricultural lands cover 75 percent of the country. Native steppe and steppe associated wet meadows have been systematically converted to cropland and pastures. The extent of loss of

steppe is not thoroughly documented, but less than one percent remains of some types of grassland and wet meadow ecosystems that were once common in Moldova. Forests cover about 10 percent of the country and, moreover, 86 percent are planted forests (Economic Commission for Europe, 1998).

2.2. **Description of Applicable Environmental and Natural Resource Legal Requirements Policies, Laws, and Regulations:**

In Moldova, the legal framework for environmental and public health protection is quite extensive. The list of legislation that can be considered relevant to this activity includes: the *Land Code* (1991), the *Water Code* (1993), the *Environmental Protection Law* (1993), the *Health Protection Law* (1995), the *Forest Code* (1996), the *Law on Licensing Certain Types of Activities* (2001), the *Law on Energy Efficiency* (2010) the *Law on Renewable Energy* (2007), the *Regulation on Environmental Audit* (1998), *Regulation on Public Involvement in the Decision Making Process* (2000), and the following policy documents: the *Biodiversity Protection National Strategy and Action Plan* (2001), and the *Transboundary Cooperation Concept* 2004-2006.

2.3. **Country/Ministry/Municipality Environmental Capacity Analysis:**

The primary central government institutions responsible for biodiversity conservation in Moldova are: the Ministry of Environment (MOE), Ministry of Agriculture and Food Industry (MAFI), and Agency Moldsilva (Moldova Forest Service).

The MOE (www.mediu.gov.md) is the national environmental authority that develops and defines governmental policies related to the environmental protection, rational use of natural resources, waste management, biodiversity conservation and state control of ecological activities. The MOE assesses and monitors biodiversity, manages some protected areas, coordinates research, ensures cross-sectorial cooperation, monitors compliance, and develops reports on the state of the environment in Moldova. At the same time, the MOE (together with its subordinated divisions and institutions) is the main governmental body responsible for ecological expertise and environmental impact assessment.

Moldsilva (www.moldsilva.gov.md) is a Ministerial level agency that manages forestry and game/hunting in the country through the implementation of policies and international treaties on rural development and employment, sustainable forest management and wildlife protection, conservation of biodiversity etc. Moldsilva is structured into 25 regional entities, including sixteen forest enterprise activities, four forestry and hunting enterprises, four state natural reserves and the Forest Research and Management Institute (ICAS). Activities of these entities are enacted through 82 local forest districts.

The Ministry of Agriculture and Food Industry (MAFI) (www.maia.gov.md) is the central state body that promotes state policy in agriculture and food industry, with responsibilities of development in relation to economy and social infrastructure. It has a number of subordinated entities, such as public institutions (research institutions, agencies, phyto-sanitary and plant protection sections etc.), education institutions (Agrarian State University and various Colleges), state enterprises (wineries, plant and animal husbandries) and commercial units dealing with processing and products marketing.

One of the main constraints faced by the MOE is the lack of capacity to develop adequate legislation and to enforce it, including issues related to inadequate financial support, weak biodiversity conservation training programs and low level of staffing for critical functions. The frequent reorganization of national and regional government agencies was certainly a source of confusion and complicated the horizontal cooperation of authorities enforcing environmental legislation. The changes in geographical coverage and the consequent transfers of files, changes in

staff and leadership, and changes in priorities delayed the development of inter-ministerial cooperation mechanisms. Environmental information from other governmental agencies often was not available to the MOE even though it was required by law. The other governmental agencies lacked specialists and/or departments to deal with environmental issues.

Local governments in Moldova are directly responsible for provision of community services, such as, waste disposal, water and sanitation, transportation, street lighting, and park management. However, local governments lack the capacity and resources necessary to invest in renovations and maintenance. Tariffs and fees cover mainly the operational costs.

2.4. Sustainability Analysis

The USAID Project Design Sustainability Analysis Tool provides succinct guidance to ensure Comunitatea Mea meets Agency sustainability requirements. Applying this tool to the Comunitatea Mea Project, the design team concluded the project is fully sustainable; that is, all project results are designed to be sustainable due to significant partner country buy-in, good social soundness, minimal recurrent costs within the fiscal capacities of the host partner, and other factors. This conclusion is based on an analysis of the following project design sustainability factors: Besides the development of the road infrastructure as well as technical assistance to efficiently manage and operate these systems, including the development of the necessary legal and institutional framework for financial sustainability of local government.

There is demonstrable local demand and ownership of project activities, where a broad segment of the community has a stake currently or potentially in ensuring that the activity or service continues after the USAID project ends. USAID will invest in local development opportunities found in Moldova's grassroots political processes, and local governments and institutions. Only where strong political will and partner motivation exists will USAID invest in these partners and projects, thereby ensuring their long-term sustainability.

USAID will develop the skills and capacity of local stakeholders whose involvement will be critical for maintaining development gains after the project ends through a range of capacity building activities from training to coaching and mentoring to on-the-job skills development to strategic planning and thinking and, perhaps most importantly, through funding for activities that generate real world experience and learning.

Comunitatea Mea will provide technical assistance to the assisted local governments to ensure that all investments in infrastructure projects and equipment will allow for environmentally sustainable development of services and communities. Capacity development will be provided to address governance issues and to educate citizens about the environmentally sound service arrangements and involve them in monitoring of quality and quantity of services.

2.5. Climate Change Vulnerability Analysis:

This analysis was not performed as part of the AIM PAD design, though the attached CRM screening has been prepared as part of this Supplemental IEE. Given the nature of Comunitatea Mea project, the majority of the Comunitatea Mea activities will have no impact either positive or negative on climate change. The exception is the support to municipal services. It is critical that technical assistance to local governments include awareness-raising and proper planning to ensure any physical works is designed, sited, and constructed taking into account more extreme weather events. The implementing partner should ensure the impacts of climate change on supported infrastructure as well as potential impacts on land management planning and zoning to improve the long-term effectiveness and sustainability of economic plans.

- 3. Analysis of potential Environmental Impact:** It is intended that information from this analysis be adequate for identifying any and all mitigation measures necessary to avoid or sufficiently reduce impacts. If an activity is a Categorical Exclusion use None Applicable (NA) for the potential impact. If an activity is Negative Determination with Conditions or Positive Determination use Potential Impacts to land, water, air, human health before describing impact.

3.1. Component 1: Improving quality of and access to municipal services

Defined/Illustrative Activities	Potential Impacts	Potential Climate Risk	Climate Risk Rating	Opportunities for Climate Resiliency
1.1 Strengthen participatory urban and strategic planning	None anticipated	Increase in rainfall variability may impact on infrastructure, increase slumping and landslides, and localized flooding Lack of raw water to extend water to new customers due to shifting precipitation patterns	Low	Activities should consider in siting, design and construction for resiliency to potential climate risks. The project will examine opportunities to share resources and infrastructure to improve efficiency and reduce costs (capital and operational). Share computer platforms/software to reduce the number of computers and save costs. Location of the computer equipment will be considered to address ventilation and cooling needs. Results from monitoring the project will address potential climate impacts.
1.2 Implement Improvements of Municipal Services. Examples include: building insulation and	Potential impact on environment, water quality impairment, habitat alteration, resource depletion, waste generation, and/or	Same as above.	Moderate	Same as above.

Defined/Illustrative Activities	Potential Impacts	Potential Climate Risk	Climate Risk Rating	Opportunities for Climate Resiliency
weatherization, street lighting, energy saving improvements to heating systems, replacement of pumps and meters, repair of water pipes to reduce water losses, small road and sidewalk repairs, replacement of sewerage pipes.	human health. Adverse impacts on environment and/or human health may be caused by poor analysis of possible impacts and/or poor design of mitigation measures. This includes but is not limited to improper installation, construction, maintenance, operations, noise and vibration; impact on water and land resulting from improper waste disposal.			
1.3 Purchase of equipment for communities to improve local service delivery e.g. meters (gas, electric, water), water pumps, garbage collectors, garbage containers and platforms, street lamps, graders, etc. based on identified needs	Minimal direct adverse impact on the environment. Some adverse impacts on environment and/or human health may be caused by poor analysis of possible impact resulting from poor siting of waste platforms (impeding traffic during collection, siting new waterways increases the chances of overflow waste entering the waterways, etc) and improper maintenance of equipment/disposal of oil, etc.	Same as above.	Low	Same as above.
1.4 Consultancy for development of engineering and feasibility studies, environmental impact assessments for infrastructure projects to ensure technical soundness and sustainability of projects	No direct adverse impact on the environment. However, an indirect adverse impact on environment and human health may be caused by inadequate analysis of possible impacts of engineering or feasibility studies and/or poor design of mitigation measures.	Same as above.	Low	Same as above.
1.5 Strengthen LPA Capacity for Inter-municipal Cooperation for Service Delivery	None anticipated	Same as above.	Low	Same as above.
1.6 Implement Administrative Service Improvements	None anticipated	Same as above.	Low	Same as above.
1.7 E-Services	None anticipated	Same as above.	Low	Same as above.

Defined/Illustrative Activities	Potential Impacts	Potential Climate Risk	Climate Risk Rating	Opportunities for Climate Resiliency
1.8 Assistance to social services	None anticipated	Same as above.	Low	Same as above.
1.9 LPA Monitoring and evaluation	None anticipated	Same as above.	Low	Same as above.

3.2. Component 2: Citizens meaningfully engaged in local governance

Defined/Illustrative Activities	Potential Impacts	Potential Climate Risk	Climate Risk Rating	Opportunities for Climate Resiliency
2.1 Strengthen LPA public outreach, communication and transparency	None anticipated	Hotter temperatures may have an impact on the way that zoning, building codes are designed; and energy, including air conditioner and water use.	Low	Include climate change impact in consultation process and monitoring
2.2 Institutionalize LPA Consultation/Cooperation Mechanisms	None anticipated	Same as above.	Low	Same as above.
2.3 Strengthen capacity of civic groups/platforms to engage with local government	None anticipated	Same as above.	Low	Same as above.
2.4 Support citizen-led monitoring of local government, public service, and budget	None anticipated	Same as above.	Low	Same as above.
2.5 Support innovative transparency and citizen engagement tools through small grants	None anticipated	Same as above.	Low	Same as above.

3.3. Component 3: Decentralization Policy Reforms Advanced

Defined/Illustrative Activities	Potential Impacts	Potential Climate Risk	Climate Risk Rating	Opportunities for Climate Resiliency
3.1 Provide policy and legislative technical support for advancing decentralization reform	None anticipated	Hotter temperatures may have an impact on the way that zoning, building codes are designed; and energy, including air conditioner and water use.	Low	Include environmental factors into legislation pertinent to local governments
3.2 Strengthen LG associations role in representing interests of LPAs	None anticipated	Same as above.	Low	Same as above.
3.3 Support broad-based dialogue on decentralization reform	None anticipated	Same as above.	Low	Same as above.
3.4 Civil society monitoring and oversight of decentralization reform	None anticipated	Same as above.	Low	Same as above.

3.4. Component 4: Increased locally-owned revenues and improved financial management practices

Defined/Illustrative Activities	Potential Impacts	Potential Climate Risk	Climate Risk Rating	Opportunities for Climate Resiliency
4.1 Maximize revenue potential of LPAs	None anticipated	Hotter temperatures may have an impact on the way that zoning, building codes are designed; and energy, including air conditioner and water use.	Low	Consider environmental costs as part of budgeting including capital, operational and maintenance costs to ensure sustainability

Defined/Illustrative Activities	Potential Impacts	Potential Climate Risk	Climate Risk Rating	Opportunities for Climate Resiliency
4.2 Transparent Budgeting Practices and Financial Management	None anticipated	Same as above.	Low	Same as above.
4.3 Property Management	None anticipated	Same as above.	Low	Same as above.
4.4 Develop municipal borrowing program	None anticipated	Same as above.	Low	Same as above.

4. Recommended Environmental Actions

4.1. Recommended Mitigation Measures

Component 1 – Improving quality of and access to municipal services.

Defined/Illustrative Activities	Potential Impacts	Mitigation Measures	Recommended Threshold Determination
1.2 Implement Improvements of Municipal Services. Examples include: building insulation and weatherization, street lighting, energy saving improvements to heating systems, replacement of pumps and meters, repair of water pipes to reduce water losses, small road and sidewalk repairs, replacement of sewerage pipes.	Potential impact on environment, water quality impairment, habitat alteration, resource depletion, waste generation, and/or human health. Adverse impacts on environment and/or human health may be caused by poor analysis of possible impacts and/or poor design of mitigation measures. This includes but is not limited to improper installation, construction, maintenance, operations, noise and vibration; impact on water and land resulting from improper waste disposal.	1. Provide capacity development to local authorities to understand and comply with newly developed regulations and laws governing environmental management. 2. Ensure infrastructure projects for service improvement are designed for consideration of more extreme weather events. 3. The IP will complete the Environmental Review Checklist (ERC)/Environmental Monitoring and Mitigation Plan (EMMP) for every infrastructure project or for clusters of projects, make a preliminary determination regarding any negative environmental impact, and submit it to the USAID COR/ AOR and MEO for their review and approval. Approval of the E&E BEO of the completed ERC/EMMP will be required.	Negative Determination with Conditions

1.3 Purchase of equipment for communities to improve local service delivery e.g. meters (gas, electric, water), water pumps, garbage collectors, garbage containers and platforms, street lamps, graders, etc. based on identified needs	Minimal direct adverse impact on the environment. Some adverse impacts on environment and/or human health may be caused by poor analysis of possible impact resulting from poor siting of waste platforms (impeding traffic during collection, siting new waterways increases the chances of overflow waste entering the waterways, etc) and improper maintenance of equipment/disposal of oil, etc.	1. Provide capacity development to local authorities for adequate operations and maintenance of the equipment, and take labor safety measures during equipment testing. 2. The IP will complete the Environmental Review Checklist (ERC)/Environmental Monitoring and Mitigation Plan (EMMP) for batches of equipment, making a preliminary determination regarding any negative environmental impact, and submit it to the USAID COR/ AOR and MEO for their review and approval. Approval of the E&E BEO of the completed ERC/EMMP will be required.	Negative Determination with Conditions
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4.2. Recommended Environmental Determination:

Categorical Exclusions:

A categorical exclusion is recommended for the following identified activities under 22 CFR 216.2(c)(2):

- Activity 1.1-1.2, 1.4-1.9, 2.1-2.5, 3.1-3.4, 4.1-4.4 under §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.);
- Activity 1.1, 1.4, 1.7, 1.8, 1.9, 2.2, 3.1, 3.4, 4.3, 4.4 under §216.2(c)(2) (iii) Analyses, studies, academic or research workshops and meetings;
- Activity 1.1, 1.4, 1.5, 1.9, 3.1 under §216.2(c)(2)(v) Document and information transfers;

Negative Determination with Conditions:

Under §216.3(a)(2)(iii), a negative determination with conditions is recommended for activities 1.2 and 1.3. Specific terms and conditions are presented below in Section 4.3.

4.3. Terms and Conditions:

4.3.1. The IP shall provide capacity development to local authorities to understand and comply with newly developed regulations and laws governing environmental management. The IP shall ensure infrastructure projects for service improvement are designed for consideration of more extreme weather events.

4.3.2 Prior to initiating activities that have the potential to result in significant adverse environmental, health, and safety impact, the IP shall prepare an ERC/EMMP(s) in the format provided in the Annex 1 of this IEE. The COR/AOR, MEO, and BEO shall approve the ERC/EMMP(s) prior to implementation. For each site-specific activity, the ERC/EMMP shall be attached to the signed *Certification of No Adverse or Significant Effects on the Environment* (See ERC/EMMP Annex 1). This should be signed by the IP, COR/AOR, MEO, and BEO. The ERC/EMMP must be completed and approved prior to activities beginning. The IP is certifying that requirements have been properly assessed; environment, health, and safety impacts requiring further consideration have been comprehensively identified; and that adverse impacts will be effectively avoided or sufficiently minimized by proper implementation of the EMMP(s) in Section H. After the IP has finalized its activities at a specific site, the IP shall sign a *Record of Compliance* with the ERC/EMMP (see ERC/EMMP Annex 2) certifying that the organization met all applicable ERC/EMMP conditions and submit it to the COR/AOR. The COR/AOR shall keep the original for the project files and provide a copy to the MEO and BEO. The Record of Compliance certifies that all the mitigation measures that the IP confirmed would occur during project implementation did indeed occur. This annex is completed at the end of the project.

4.3.3 ERC/EMMPs shall be captured in annual work plans, and therefore budgeted for and reviewed for adequacy at least annually.

4.3.4 Changes in activities and their associated ERC/EMMPs shall necessitate amending the IEE or issuing a Memo to the File (depending on extent and potential impact of the changes)

4.4. USAID Monitoring and Reporting

- 4.4.1. The AOR/COR, with the support of the MEO, is responsible for monitoring compliance of activities by means of desktop reviews and site visits.

- 4.4.2. If at any time the project is found to be out of compliance with the IEE, the AOR/COR or MEO shall immediately notify the BEO.
- 4.4.3. A summary report of Mission's compliance relative to this IEE shall be sent to the BEO on an annual basis, normally in connection with preparation of the Mission's annual environmental compliance report required under ADS 203.3.8.5 and 204.3.3.
- 4.4.4. The BEO or his/her designated representative may conduct site visits or request additional information for compliance monitoring purposes to ensure compliance with this IEE, as necessary.

4.5. Implementing Partner (IP) Monitoring and reporting

- 4.5.1. If an individual activity is found to pose significant adverse environmental effects that have not been identified and addressed in the attached EMMP(s), or EMMPs that were subsequently approved for the project, new EMMPs shall be developed to include environmental safeguards for such effects. The AOR shall be immediately contacted to discuss the situation and find suitable solutions.
- 4.5.2. IPs shall report on environmental compliance requirements as part of their routine project reporting to USAID.

5. Mandatory Inclusion of Requirements in Solicitations, Awards, Budgets and Workplans

- 5.1.1. Appropriate environmental compliance language, including limitations defined in Section 6, shall be incorporated into solicitations and awards for this activity and projects budgets shall provide for adequate funding and human resources to comply with requirements of this IEE.
- 5.2. Solicitations shall include Statements of Work with task(s) for meeting environmental compliance requirements and appropriate evaluation criteria.
- 5.3. Environmental mitigation and monitoring requirements, when available, shall also be included in solicitations and awards.
- 5.4. The IP shall incorporate conditions set forth in this IEE into their annual work plans.
- 5.5. The IP shall ensure annual work plans do not prescribe activities that are defined as limitations, as defined in Section 6.
- 5.6. The USAID Mission will include an indicator for environmental compliance as part of the project's performance monitoring plan. [If an IEE has a threshold determination of negative determination with conditions, then a possible indicator is if the IP did the ERC/EMMP.]

6. Limitations of the IEE: This IEE does not cover activities (and therefore should changes in scope implicate any of the issues/activities listed below, a BEO-approved amendment shall be required), that:

- 3.7.1 Normally have a significant effect on the environment under §216.2(d)(1) [See http://www.usaid.gov/our_work/environment/compliance/regulations.html]
- 3.7.2 Support project preparation, project feasibility studies, engineering design for activities listed in §216.2(d)(1);
- 3.7.3 Affect endangered species;
- 3.7.4 Result in wetland or biodiversity degradation or loss;
- 3.7.5 Support extractive industries (e.g. mining and quarrying);
- 3.7.6 Promote timber harvesting;
- 3.7.7 Provide support for regulatory permitting;
- 3.7.8 Result in privatization of industrial or infrastructure facilities;
- 3.7.9 Lead to new construction of buildings or other structures;

- 3.7.10 Assist the procurement (including payment in kind, donations, guarantees of credit) or use (including handling, transport, fuel for transport, storage, mixing, loading, application, cleanup of spray equipment, and disposal) of pesticides or activities involving procurement, transport, use, storage, or disposal of toxic materials and /or pesticides (cover all insecticides, fungicides, rodenticides, etc. covered under the Federal Insecticide, Fungicide, and Rodenticide Act); and
- 3.7.11 Procure or use genetically modified organisms.

7. Revisions

- 7.1. Under §216.3(a)(9), if new information becomes available that indicates that activities covered by the IEE might be considered major and their effect significant, or if additional activities are proposed that might be considered major and their adverse effect significant, this environmental threshold decision will be reviewed and, if necessary, revised by the Mission with concurrence by the BEO. It is the responsibility of the USAID COR/AOR to keep the MEO and BEO informed of any new information or changes in the activity that might require revision of this IEE.

8. Recommended Environmental Threshold Decision Clearances:

Approval : Approved by email 4/25/2017
 Lynn Vega, Acting USAID Representative to Moldova Date

Clearance:  4/21/17
 Julie Appelhagen, Mission Environmental Officer Date

Clearance : Cleared by email 4/19/2017
 Joel Sandefur, Resident Legal Officer Date

Clearance : Cleared by email 4/18/2017
 Stephanie Chettraru, Supervisory General Development Officer Date

Concurrence:  04/25/2017
 Mark Kamiya Date
 E&E Bureau Environmental Officer

Distribution:

IEE File

MEO (to also provide a copy to AOR/COR)



**ENVIRONMENTAL REVIEW CHECKLIST
(ERC) for Identifying Potential Environmental
Impacts of Project Activities and Processes/
ENVIRONMENTAL MITIGATION AND
MONITORING PLAN
(EMMP)
ERC/EMMP**

for [Activity Name]

Implemented under: [*Project Name*]

DCN: [*of Parent IEE*]

Prepared by: [*Implementer*]

ENVIRONMENTAL REVIEW CHECKLIST FOR IDENTIFYING POTENTIAL ENVIRONMENTAL IMPACTS OF PROJECT ACTIVITIES AND PROCESSES

The Environmental Review Checklist for Identifying Potential Environmental Impacts of Project Activities and Processes (ERC) and Environmental Mitigation and Monitoring Plan (EMMP) is intended for use by implementing partners to: assess activity-specific baseline conditions, including applicable environmental requirements; identify potential adverse environmental effects associated with planned activity(s) and processes; and develop EMMPs that can effectively avoid or adequately minimize the identified effects. This ERC/EMMP may be substituted for other ERC/EMMP versions that may have been attached to previous initial environmental examinations (IEE). If implementing partners are in doubt about whether a planned activity requires preparation of an ERC, they should contact their Contracting Officer's Representative (COR)/Agreement Officer's Representative (AOR) for clarification. In turn, the COR/AOR should contact their Mission Environmental Officer (MEO) if they have any questions. In special circumstances and with approval of the BEO it is possible to have one very comprehensive ERC/EMMP for multiple projects if they are similar in scope. *(When preparing the ERC/EMMP, please indicate "not applicable" for items that have no bearing on the activity. The ERC/EMMP should be completed by an environmental specialist. **The ERC/EMMP must be completed and approved prior to the activity beginning.**)*

A. Activity and Site Information

Project Name: (as stated in the triggering IEE)	
Mission/Country:	
DCN of Most Recent Triggering IEE or Amendment:	
Activity/Site Name:	
Type of Activity:	
Name of Reviewer and Summary of Professional Qualifications:	
Date of Review:	

B. Activity Description

1. Activity purpose and need
2. Amount of activity
3. Location of activity
4. Beneficiaries, e.g., size of community, number of school children, etc.
5. Number of employees and annual revenue, if this is a business
6. Implementation timeframe and schedule
7. Detailed description of activity, items that will be purchased *(This section should fully describe what funds are being used for.)*
8. Detailed description of site, e.g., size of the facility or hectares of land; steps that will be taken to accomplish the activity;

9. Existing or planned certifications, e.g., ISO 14001 EMS, ISO 9000, HCCP, SA 8000, Global Gap, Environmental Product Declarations, Eco Flower, EcoLogo, Cradle to Cradle, UL Environment, GREENGUARD, Fair Trade, Green Seal, LEED, or various Forest Certifications
10. Site map, e.g., provide an image from Google Earth of the location
11. Photos of site, items to be purchased, engineering construction plans (*when available*)

C. Activity-Specific Baseline Environmental Conditions

1. Population characteristics
2. Geography
3. Natural resources, e.g., nearby forest/protected areas, ground and surface water resources
4. Current land use and owner of land
5. Proximity to public facilities, e.g. schools, hospitals, etc.
6. Other relevant description of current environmental conditions in proximity to the activity

D. Legal, Regulatory, and Permitting Requirements

1. National environmental impact assessment requirements for this activity
2. Applicable National or local permits for this activity, responsible party, and schedule for obtaining them:

Permit Type	Responsible party	Schedule
Zoning		
Building/Construction		
Source Material Extraction		
Waste Disposal		
Wastewater		
Storm Water Management		
Air Quality		
Water Use		
Historical or Cultural Preservation		
Wetlands or Water bodies		
Threatened or Endangered Species		
Other		

3. Additional National, European Union, or other international environmental laws, conventions, standards with which the activity might be required to comply
 - a. Air emission standards
 - b. Water discharge standards
 - c. Solid waste disposal or storage regulations
 - d. Hazardous waste storage and disposal
 - e. Historical or cultural preservation
 - f. Other

E. Engineering Safety and Integrity (*for Sections E. and F., provide a discussion for any of the listed issues that are yes answers and likely to have a bearing on this activity*)

1. Will the activity be required to adhere to formal engineering designs/plans? Have these been or will they be developed by a qualified engineer? If yes, attach the plans to the ERC/EMMP.
2. Do designs/plans effectively and comprehensively address:
 - a. Management of storm water runoff and its effects?
 - b. Reuse, recycling, and disposal of construction debris and by-products?
 - c. Energy efficiency and/or preference for renewable energy sources?
 - d. Pollution prevention and cleaner production measures?
 - e. Maximum reliance on green building or green land-use approaches?
 - f. Emergency response planning?
 - g. Mitigation or avoidance of occupational safety and health hazards?
 - h. Environmental management of mobilization and de-mobilization?
 - i. Capacity of the host country recipient organization to sustain the environmental management aspects of the activity after closure and handover?
3. Are there known geological hazards, e.g., faults, landslides, or unstable soil structure, which could affect the activity? If so, how will the project ensure structural integrity?
4. Will the site require grading, trenching, or excavation? Will the activity generate borrow pits? If so, how will these be managed during implementation and closure?
5. Will the activity cause interference with the current drainage systems or conditions? Will it increase the risk of flooding?
6. Will the activity interfere with above- or below-ground utility transmission lines, e.g., communications, water, sewer, or natural gas?
7. Will the activity potentially interfere with vehicle or pedestrian traffic?
8. Does the activity increase the risk of fire, explosion, or hazardous chemical releases?
9. Does the activity require disposal or retrofitting of polychlorinated biphenyl-containing equipment, e.g., transformers or florescent light ballasts?

F. Environment, Health, and Safety Consequences

1. Potential impacts to public health and well-being

- a. Will the activity require temporary or permanent property land taking?
- b. Will activities require temporary or permanent human resettlement?
- c. Will area residents and/or workers be exposed to pesticides, fertilizer, or other toxic substances, e.g., as a result of farming or manufacturing? If yes, then there should be an approved, current PERSUAP on file and discuss how it will be used in this situation. If so, how will the project:
 - i. Ensure that these chemicals do not contaminate ground or surface water?
 - ii. Ensure that workers use protective clothing and equipment to prevent exposure?
 - iii. Control releases of these substances to air, water, and land?
 - iv. Restrict access to the site to reduce the potential for human exposure?

- d. Will the activity generate pesticide, chemical, or industrial wastes? Could these wastes potentially contaminate soil, groundwater or surface water?
- e. Will chemical containers be stored at the site?
- f. Does the activity remove asbestos-containing materials or use of building materials that may contain asbestos, formaldehyde, or other toxic materials? Can the project certify that building materials are non-toxic? If so, how will these wastes be disposed of?
- g. Will the activity generate other solid or hazardous wastes such as construction debris, dry or wet cell batteries, florescent tubes, aerosol cans, paint, solvents, etc.? If so, how will this waste be disposed of?
- h. Will the activity generate nontoxic, nonhazardous solid wastes (subsequently requiring land resources for disposal)?
- i. Will the activity pose the need to handle and dispose of medical wastes? If so, describe measures of ensuring occupational and public health and safety, both onsite and offsite.
- j. Does the activity provide a new source of drinking water for a community? If so, how will the project monitor water quality in accordance with health standards?
- k. Will the activity potentially disturb soil contaminated with toxic or hazardous materials?
- l. Will activities, e.g., construction, refurbishment, demolition, or blasting, result in increased noise or light pollution, which could adversely affect the natural or human environment?

2. Atmospheric and air quality impacts

- a. Will the activity result in increased emission of air pollutants from a vent or as fugitive releases, e.g., soot, sulfur dioxide, oxides of nitrogen, volatile organic compounds, methane.
- b. Will the activity involve burning of wood or biomass?
- c. Will the activity install, operate, maintain, or decommission systems containing ozone depleting substances, e.g., freon or other refrigerants?
- d. Will the activity generate an increase in carbon emissions?
- e. Will the activity increase odor and/or noise?

3. Water quality changes and impacts

- a. *How far is the site located from the nearest river, stream, or lake?(Non-yes/no question)*
- b. Will the activity disturb wetland, lacustrine, or riparian areas?
- c. *What is the depth to groundwater at the site? (Non-yes/no question)*
- d. *Will the activity result in increased ground or surface water extraction? If so, what are the volumes? Permit requirements? (Non-yes/no question)*
- e. Will the activity discharge domestic or industrial sewage to surface, ground water, or publicly-owned treatment facility?
- f. Does the activity result in increased volumes of storm water run-off and/or is there potential for discharges of potentially contaminated (including suspended solids) storm water?

- g. Will the activity result in the runoff of pesticides, fertilizers, or toxic chemicals into surface water or groundwater?
- h. Will the activity result in discharge of livestock wastes such as manure or blood into surface water?
- i. Does the site require excavation, placing of fill, or substrate removal (e.g., gravel) from a river, stream or lake?

4. Land use changes and impacts

- a. Will the activity convert fallow land to agricultural land?
- b. Will the activity convert forest land to agricultural land?
- c. Will the activity convert agricultural land to commercial, industrial, or residential uses?
- d. Will the activity require onsite storage of liquid fuels or hazardous materials in bulk quantities?
- e. Will the activity result in natural resource extraction, e.g., granite, limestone, coal, lignite, oil, or gas?
- f. Will the activity alter the viewshed of area residents or others?

5. Impacts to forestry, biodiversity, protected areas and endangered species

- a. Is the site located adjacent to a protected area, national park, nature preserve, or wildlife refuge?
- b. Is the site located in or near threatened or endangered (T&E) species habitat? Is there a plan for identifying T&E species during activity implementation? If T&E species are identified during implementation, is there a formal process for halting work, avoiding impacts, and notifying authorities?
- c. Is the site located in a migratory bird flight or other animal migratory pathway?
- d. Will the activity involve harvesting of non-timber forest products, e.g., mushrooms, medicinal and aromatic plants (MAPs), herbs, or woody debris?
- e. Will the activity involve tree removal or logging? If so, please describe.

6. Historic or cultural resources

- a. Are there cultural or historic sites located at or near the site? If so, what is the distance from these? What is the plan for avoiding disturbance or notifying authorities?
- b. Are there unique ethnic or traditional cultures or values present in the site? If so, what is the applicable preservation plan?

G. Further Analysis of Recommended Actions *(Most activities will have a threshold determinations of negative determination with conditions..*

☐ **1. Categorical Exclusion:** The activity is not likely to have an effect on the natural or physical environment. No further environmental review is required.* (This is rarely used in the ERC/EMMP.)

☐ **2. Negative Determination with Conditions:** The activity does not have potentially significant adverse environmental, health, or safety effects, but may contribute to minor impacts that can be eliminated or adequately minimized by appropriate mitigation measures. ERC/EMMPs shall be developed, approved by the Mission Environmental Officer (MEO) and the BEO **prior to beginning the activity**, incorporated into workplans, and then implemented. For activities related to the procurement, use, or training related to pesticides, a PERSUAP will be prepared for BEO approval, PERSUAPS are considered amendments to the IEE and

usually Negative Determination with Conditions. See Sections H and I below.*

☐ **3. Positive Determination:** The activity has potentially significant adverse environmental effects and requires further analysis of alternatives, solicitation of stakeholder input, and incorporation of environmental considerations into activity design. A Scoping Statement (SS) must be prepared and be submitted to the BEO for approval. Following BEO approval of the SS an Environmental Assessment (EA) will be conducted. The activity may not be implemented until the BEO clears the final EA. If the Parent IEE does not have Positive Determination as one of the threshold determinations, the IEE needs to be amended.

☐ **4. Activity Cancellation:** The activity poses significant and unmitigable adverse environmental effects. Adequate ERC/EMMPs cannot be developed to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

***Note regarding applicability related to Pesticides (216.2(e):** The exemptions of §216.2(b)(1) and the categorical exclusions of §216.2(c)(2) **such as technical assistance, education, and training** are not applicable to assistance for the procurement or use of pesticides.

H. EMMPs (*Using the format provided below list the processes that comprise the activity, then for each, identify impacts requiring further consideration, and for each impact describe the mitigation and monitoring measures that will be implemented to avoid or adequately minimize the impacts. All environment, health, and safety impacts requiring further consideration, which were identified in Section F., should be addressed*)

1. Activity-specific environmental mitigation plan (Upon request, the MEO may be able to provide your project with example EMMPs that are specific to your activity.)

Processes	Identified Environmental Impacts	Do the Impacts Require Further Consideration?	Mitigation Measures	Monitoring Indicators
List all the processes that comprise the activity(s) (e.g. asbestos roof removal, installation of toilets, remove and replace flooring) A line should be included for each	A single process may have several potential impacts—provide a separate line for each.	For each impact, indicate Yes or No ; if No , provide justification, e.g.,: (1) There are no applicable legal requirements including permits or reporting and (2) There is no relevant community concern and (3) Pollution prevention is not feasible or practical and (4) Does not pose a risk because of low	For each impact requiring further consideration, describe the mitigation measures that will avoid or adequately minimize the impact. (If mitigation measures are well-specified in the IEE, quote directly from IEE.)	Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)

Processes	Identified Environmental Impacts	Do the Impacts Require Further Consideration?	Mitigation Measures	Monitoring Indicators
<i>process.</i>		<i>severity, frequency, or duration</i>		

2. Activity-specific monitoring plan

Monitoring Indicators	Monitoring and Reporting Frequency	Responsible Parties	Records Generated
<i>Specify indicators to (1) determine if mitigation is in place and (2) successful (for example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)(Taken from column 5 of the environmental mitigation plan above.)</i>	<i>For example: “Monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID COR/AOR.”</i>	<i>Separate parties responsible for mitigation from those responsible for reporting, whenever appropriate,</i>	<i>If appropriate, describe types of records generated by the mitigation, monitoring, and reporting process.</i>

ERC/EMMP ANNEX 1

Certification of No Adverse or Significant Effects on the Environment

I, the undersigned, certify that activity-specific baseline conditions and applicable environmental requirements have been properly assessed; environment, health, and safety impacts requiring further consideration have been comprehensively identified; and that adverse impacts will be effectively avoided or sufficiently minimized by proper implementation of the EMMP(s) in Section H. If new impacts requiring further consideration are identified or new mitigation measures are needed, I will be responsible for notifying the USAID COR/AOR, as soon as practicable. Upon completion of activities, I will submit a ***Record of Compliance with Activity-Specific EMMPs*** using the format provided in ERC Annex 2.

 Implementer Project Director/COP *Name*

 Date
Approvals:

 USAID COR/AOR *Name*

 Date

 Mission Environmental Officer *Name*

 Date
Concurrence:

 Mark Kamiya, Bureau Environmental Officer

 Date
Distribution:

- Project Files
- IEE Files

ERC/EMMP ANNEX 2
RECORD OF COMPLIANCE WITH ACTIVITY-SPECIFIC
ENVIRONMENTAL MITIGATION AND MONITORING PLANS (EMMPs)

Subject:	<i>Site or Activity Name/Primary Project</i>
IEE DCN:	
To:	<i>COR/AOR/Activity Manager Name</i>
Copy:	<i>Mission Environmental Officer Name</i>
Date:	

The [name of the implementing organization] has finalized its activities at the [site name] to [describe activities and processes that were undertaken]. This memorandum is to certify that our organization has met all conditions of the EMMPs for this activity. A summary and photo evidence of the how mitigation and monitoring requirements were met is provided below.

1. Mobilization and Site Preparation
2. Activity Implementation Phase
3. Site Closure Phase
4. Activity Handover

Sincerely,

 Implementer Project Director/COP Name

 Date

Approved:

 USAID/COR/AOR/Activity Manager Name

 Date

Distribution:

- Project Files
- MEO
- Bureau Environmental Officer

Climate Risk Screening and Management Tool for Activity Design

ACTIVITY CRM TOOL OUTPUT MATRIX: CLIMATE RISKS, OPPORTUNITIES, AND ACTIONS

* = A required element, according to the Mandatory Reference

1.1: Defined or Anticipated Tasks or Interventions*	1.2: Time-frame	1.3: Geography	2: Climate Risks*	3: Adaptive Capacity	4: Climate Risk Rating* [Enter rating for each risk: High, Moderate, or Low]	5: Opportunities*	6.1: Climate Risk Management Options	6.2: How Climate Risks Are Addressed in the Activity*	7: Next Steps for Activity Implementation	8: Accepted Climate Risks*
Component 1: Improving quality of and access to municipal services	5 years	Moldova	Increase in rainfall variability may impact on infrastructure, increase slumping and landslides, and localized flooding Lack of raw water to extend water to new customers due to shifting precipitation patterns	There is limited government support to address the issues and the country relies heavily on donor support.	Low	Activities should consider in siting, design and construction for resiliency to potential climate risks. The project will examine opportunities to share resources and infrastructure to improve efficiency and reduce costs (capital and operational). Share computer platforms/software to	Use of energy efficient technologies. Monitoring results will be use to adapt local government services as appropriate.	Work with utilities/LPAs to survey infrastructure to fully assess risk in target areas. Build capacity of LPAs to conduct climate vulnerability assessments and adaptation planning	Project will follow local environmental laws and regulations and international regulations to which Moldova is signatory.	None

						reduce the number of computers and save costs. Location of the computer equipment will be considered to address ventilation and cooling needs. Results from monitoring the project will address potential climate impacts				
Component 2: Citizens meaningfully engaged in local governance	5 years	Moldova	Hotter temperatures may have an impact on the way that zoning, building codes are designed; and energy, including air conditioner and water use.	There is limited government support to address the issues and the country relies heavily on donor support.	Low	Include climate change impact in consultation process and monitoring	Monitoring results will be use to adapt local government services as appropriate.	NA	Project will follow local environmental laws and regulations.	None
Component 3: Decentralization Policy Reforms Advanced	5 years	Moldova	Hotter temperatures may have an impact on the way that zoning, building codes are designed; and energy, including air	There is limited government support to address the issues and	Low	Include environmental factors into legislation pertinent to local	Monitoring results will be use to adapt local government services as	NA	Project will follow local environmental laws and regulations.	None

			conditioner and water use.	the country relies heavily on donor support.		governments	appropriate.			
Component 4: <i>Increased locally-owned revenues and improved financial management practices</i>	5 years	Moldova	Hotter temperatures may have an impact on the way that zoning, building codes are designed; and energy, including air conditioner and water use.	There is limited government support to address the issues and the country relies heavily on donor support.	Low	Consider environmental costs as part of budgeting including capital, operational and maintenance costs to ensure sustainability	Monitoring results will be use to adapt local government services as appropriate.	NA	Project will follow local environmental laws and regulations.	None