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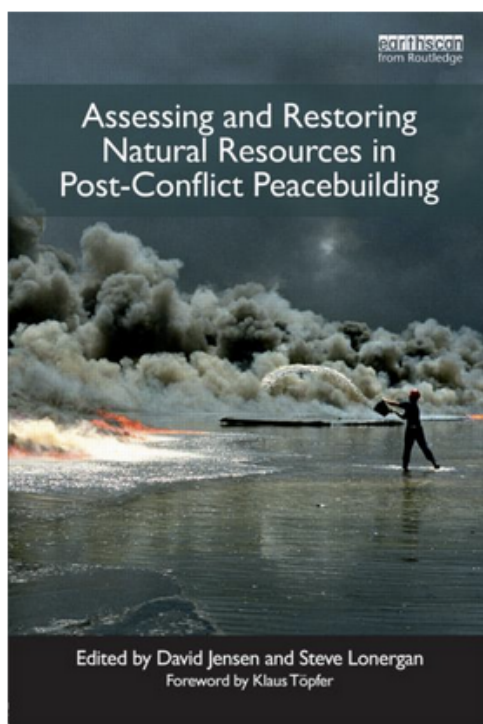
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Mitigating the environmental impacts of post-conflict assistance: Assessing USAID's approach

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Mitigating the environmental impacts of post-conflict assistance: Assessing USAID's approach

Charles Kelly

Donors frequently provide post-conflict assistance with the assumption that helping people in immediate need outweighs possible negative environmental consequences. Moreover, because of higher per capita levels of international assistance, the post-conflict period is usually characterized by more intense development than at times of peace. As development accelerates, the potential for adverse environmental impacts intensifies.

Providers of assistance and policy makers alike often believe that environmental reviews of assistance projects slow recovery and hinder clear demonstration of the peace dividends to conflict victims and, particularly, former combatants. Why wait six months for an environmental review when conflict-affected people need homes, jobs, and all the features of a peaceful society? Political interests and demand for quick recovery can lead to bypassing or ignoring environmental reviews, resulting in more damage to the environment, increased hardship for victims, and sowing seeds for future conflict.

Post-conflict assistance is one of several mechanisms used to build peace and often includes physical aid, such as rebuilding schools and infrastructure, together with capacity building, such as training and institutional development. The manner in which post-conflict assistance and, specifically, the management of natural resources are conducted is critical to successful peacebuilding. For example, if one group of former combatants believes another group benefits more from allocation of land for resettlement, conflict might arise.

This chapter describes attempts by one organization, the U.S. Agency for International Development (USAID), to balance the imperative for timely post-conflict assistance with the need to assess the environmental impacts of assistance.

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The chapter focuses on four environmental-review documents that cover post-conflict assistance in Afghanistan, Indonesia, Uganda, and the West Bank and the Gaza Strip (West Bank/Gaza) (USAID 2006).¹ Each case is summarized, and issues arising from the four regions are discussed. The chapter concludes by identifying the strengths and challenges of the USAID environmental-review process.

USAID was selected because it follows clearly defined environmental-review policies and procedures after a conflict. The procedures have been used for decades and are well known within the organization and by most implementing partners. USAID requires that senior staff in Washington, D.C., concur with impact assessment results. The process somewhat tempers field-level pressure to overlook environmental issues in order to provide post-conflict assistance quickly.

USAID'S ENVIRONMENTAL REVIEWS

USAID's environmental-review procedures are set out in the Code of Federal Regulations at 22 CFR 216, commonly referred to as Regulation 216 (USAID 1976). After the Environmental Defense Fund sued USAID in 1975, the agency developed environmental-review procedures that reflected the U.S. National Environmental Policy Act (USAID 2004).

Regulation 216 includes two key exemptions—international disaster or emergency assistance and foreign-policy sensitivities (USAID 1976). The first exemption is commonly applied in initial stages following a conflict, when there are significant humanitarian needs. But the justification for the exemption diminishes with time; 180 days after a conflict should be sufficient time to plan longer-term assistance and implement review procedures.

In summary, USAID's environmental impact-review process involves the following:²

- An initial environmental examination (IEE) to determine whether there is need for further review of environmental issues. An IEE normally generates one of three outcomes: (1) a categorical exclusion, (2) a negative determination, or (3) a positive determination (USAID 1976). A *categorical exclusion* indicates that the proposed action has been determined in advance not to result in negative environmental impacts, and no further environmental review is needed.³ A *negative determination* is given when no significant environmental

¹ The bureau environmental officer for USAID's Democracy, Conflict and Humanitarian Assistance Bureau provided the reviews for Afghanistan, Uganda, and West Bank/Gaza.

² The full set of USAID's environmental-review procedures can be found at www.usaid.gov/our_work/environment/compliance/regulations.html.

³ Note that exclusions are at the review stage, whereas exemptions related to emergencies arise from policy and negate the need for environmental impact assessments. Where an exemption is used, there is an implicit reliance on minimal international technical standards for humanitarian assistance to address environmental issues or impacts.

impact is expected. A negative determination can be classed as “with conditions,” indicating that the proposed action could have harmful effects on the environment. Measures to address these harmful effects can be incorporated into the project design without a more extensive environmental review. A negative determination with conditions is usually given when both the expected negative impacts and mitigation measures are understood. When an IEE indicates that no significant environmental issues exist, no further review is needed. A *positive determination* indicates that one or more significant negative impacts may occur. A positive determination triggers a scoping statement and full environmental review.

- A scoping statement to define issues that require further evaluation in the case of a positive determination at the IEE level.
- An environmental assessment, when an in-depth review of the proposed actions is needed based on a scoping statement. An environmental assessment identifies alternatives to proposed actions that may have significant negative impacts on the environment and defines a plan for mitigation and monitoring.

USAID environmental officers manage the review process. At the mission (field) level, there is at least one mission environmental officer (MEO). The MEO is backed by a regional environmental advisor (REA) and, at the Washington level, a bureau environmental officer (BEO).⁴

Many USAID officials—including technical staff and mission directors, overseas and office directors, and BEOs in Washington—need to approve environmental reviews. Employees are liable for negative audits and evaluations, and experienced staff realize that conducting environmental reviews prevents harm to intended beneficiaries and decreases problems with American taxpayers.

USAID has made considerable effort to formalize the review process and train agency staff and implementing partners. As a result, the agency has a clear step-by-step review process and a cadre of individuals, from USAID, partner organizations, and the private sector, who can undertake, manage, and complete processes for final evaluation and decisions by BEOs.

Afghanistan Stabilization Initiative

The U.S. government considers Afghanistan a “rebuilding country.” The Afghanistan Stabilization Initiative, a US\$35 million project, is intended to provide options for “advancing the writ of GIRoA” (USAID 2009b, 6).⁵ USAID’s activities, supported by the Office of Transition Initiatives (OTI), were to:

⁴ For more information, see www.usaid.gov/our_work/environment/compliance/22cfr216.htm#216.3.

⁵ The abbreviation *GIRoA* in quoted material refers to the government of the Islamic Republic of Afghanistan.

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facilitate collaborative decision making processes related to small in-kind grant activities.

Other initial planned activities could include:

- Supporting local media organizations to assist them in providing accurate information to communities;
- Training GIRoA employees on stabilization programming best practices (USAID 2009b, 6).

These activities were to take place within two larger programmatic objectives to “create conditions that build confidence between communities and GIRoA through the improvement of the economic and social environment in the region; and, to increase public access to information about GIRoA’s social, economic, and political activities and policies in Afghanistan” (USAID 2009b, 5).

The environmental impact–review process focused on the types of activities to be undertaken, such as repairing schools, rather than on specific activities, such as fixing particular schools based on damage reports. This lack of precision is common during transitions from conflict to recovery.

The documents considered by the environmental impact–review process included a program rationale; a summary of environmental conditions in Afghanistan; an evaluation of potential environmental impacts; recommendations on IEE determination and mitigation, monitoring, and evaluation; environmental-review procedures; guidance on staffing to support environmental issues; a section on environmentally sound design and management; Afghan environmental laws and regulations; USAID rules for pesticide use; and an environmental screening form and management plan. OTI contractors, who implemented the program, were to follow the guidance provided in the environmental-review document.

The IEE process led to two determinations:

- “A **Categorical Exclusion** from environmental examination [for] . . . short-term technical assistance, training for strategic planning, strategic communications, surveying/polling, financial management, commodity procurement, information dissemination, provision of equipment, dialogue support, media programming and transmission, communications support to government and NGOs, and creating public forums for communities” (USAID 2009b, 9).
- “A **Negative Determination with Conditions** . . . for projects involving activities such as repair and rehabilitation of public facilities (schools, clinics, government buildings, market places, parks, sidewalks, roads, flood controls, irrigation channels, small-scale water/sanitation projects), tree planting, small animal husbandry” (USAID 2009b, 9).

For the negative determination with conditions, guidance was provided on how to address or limit possible negative environmental impacts. For example, for road rehabilitation, reference was made to the chapter “Rural Roads,” in *Environmental Guidelines for Small Scale Activities in Africa* (USAID 2009a), and *Low-Volume Roads Engineering: Best Management Practices Field Guide* (Keller and Sherar 2003).

The outcome of the IEE process also included an environmental screening form and an environmental management plan for use in assessing possible adverse environmental impacts and the risk of their occurring during the assistance effort. The results of the screening were to be used in identifying environmental risks that needed to be mitigated or avoided during implementation of project activities (USAID 2009b).

The environmental review was finalized in mid-May 2009, and the program was projected to start in June 2009. The review was conducted by the OTI Afghanistan program manager and was cleared by the USAID Afghanistan MEO, USAID Afghanistan mission director, Democracy, Conflict, and Humanitarian Assistance (DCHA)/OTI/Asia and Middle East (AME) team leader, DCHA/OTI director, and DCHA BEO, and was endorsed by the AME BEO and the USAID Asia REA.⁶

Indonesia: Immediate Support to Conflict-Affected Communities within the Framework of the Peace Agreement Implementation in Indonesia

Following the peace agreement between the government of Indonesia (GOI) and the Free Aceh Movement, the GOI requested assistance to aid conflict-affected communities in reintegrating former combatants into civil life (USAID 2006). The US\$2 million project focused on supporting peace and sustainable reconstruction through quick-impact, community-focused development activities. USAID/Jakarta conducted the environmental impact-review process, and a grantee implemented the project.

The time frame and focus of assistance covered both the immediate and medium term at the individual and community levels. The project included a transitional reintegration package, information campaigns, counseling and referral services, infrastructure repair and reconstruction, training, support for cooperatives, social and cultural events, commodities requested by communities, and material support to restart livelihoods.

The environmental-review document included a summary of findings, recommended environmental actions, descriptions of activities, and discussion of environmental impacts.

It determined that livelihood assistance, training, meetings, information-related activities, materials provision, and technical assistance met the criteria for a categorical exclusion. Activities related to reconstruction, rehabilitation, agriculture, and similar efforts met the criteria for a negative determination with conditions. The conditions included submission of a pesticide evaluation report and safe-user plan (PERSUAP) and measures to limit environmental effects, including controlling erosion, legally sourcing building materials, managing wastewater, and providing fishing boats and equipment only to people who lost

⁵ This level of consensus, which is standard for issuing a USAID review, was required for the other USAID review documents included in the chapter.

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them because of the conflict. The conditions were presented in the review document as instructions to the grantee that implemented the project.

The review was prepared by USAID employees in early March 2006 and was approved within a week by USAID officials.

Uganda: Healthy Practices, Strong Communities Program (HPSC)

HPSC is intended to assist war-affected populations in the health and agricultural sectors in Northern Uganda. The goal of the US\$19.8 million, five-year (2008–2013) program is to “support the return and economic recovery of selected communities in Northern Uganda that have been displaced for years by internal strife” (Mercy Corps 2009, 2).

The project involves activities in the following areas:

- *Agriculture.* Improving access to food by planting women’s gardens and demonstration plots, working through existing peace structures, strengthening high-value agricultural value chains, increasing funding for producers, facilitating the provision of inputs (such as seeds and tools), improving animal health care, supporting extension agents, linking private and public institutions, using food-for-work programs to improve feeder roads, and adopting environmentally sound agricultural practices.
- *Health.* Bettering delivery of health care and nutrition by increasing access to mother-child health and nutrition services, training health-care staff, providing vitamin A supplements, improving health-seeking behavior, promoting optimal dietary practices, and promoting home gardens.
- *Water.* Increasing availability of safe water and sanitation facilities by assessing existing water points;⁷ rehabilitating, constructing, and maintaining wells; promoting proper water storage; encouraging adoption of improved sanitation and hygiene practices; rehabilitating, constructing, and maintaining sanitary facilities; and promoting personal hygiene.

The environmental-review document included a summary of findings, a background and activity description, country and environmental information, recommended actions, an environmental management form, and a table setting out proposed activities and their environmental-impact determinations.

Most HPSC activities were covered by categorical exclusions. Activities related to small-scale gardening and rehabilitation, construction, and maintenance of sanitation facilities were given negative determinations.

Activities linked to increasing funds for producer groups and those involved in raising the value of products; providing inputs (e.g., non-pesticide-treated seeds and tools); improving feeder roads, agricultural demonstration plots, and diet diversification; and the rehabilitation and construction of water points received

⁶ Water points are places from which people access water, such as wells, and water sources are places from which water originates, such as streams.

negative determinations with conditions. It is not clear why the rehabilitation, construction, and maintenance of sanitation facilities was given a negative determination, while rehabilitation and construction of water points was given a negative determination with conditions because both involve construction and possible indirect negative impacts on the environment (e.g., increased production of wastewater).

Actions to mitigate the negative environmental effects of activities with a negative determination with conditions were listed in the review document. The review also made considerable reference to USAID and other documents that offer guidance on how to mitigate or avoid negative environmental impacts.⁸ The review document also referred to other USAID environmental reviews, such as a PERSUAP for pesticide and livestock treatment, which could be used to steer program activities.

The review document was first prepared in December 2007 and was revised in September 2009, in both cases by Mercy Corps staff. The revised review document was approved by USAID on November 24, 2009.

West Bank/Gaza Transition Initiative

The West Bank/Gaza Transition Initiative was intended to “respond to political openings following Palestinian leadership changes and Israel’s disengagement from Gaza and parts of the northern West Bank” and had “two broad objectives to support emerging, moderate Palestinian leaders and strengthen civil society organizations, citizen groups, and other constituencies for peace to generate grassroots demand for change” (USAID 2007b, 4). The US\$25 million project began in 2005, and the review document covered an extension from mid-2007 to mid-2009. The document was prepared by USAID and detailed how a contractor would conduct program activities.⁹

As in Afghanistan, the nature and location of program activities could not be determined at the time of review. Planned activities were divided into two groups:

- Social services and training, with a focus on local groups and civic education, information dissemination, and sports and livelihoods support.
- Repair, reconstruction, or construction of infrastructure, including repairs to public buildings; small-scale public works such as parks; and small-scale water supply, wastewater management, and transportation infrastructure.

The environmental-review document included a summary of findings, background and description of activities, information on the targeted region and

⁷ See, for example, USAID (2007a).

⁸ The USAID mechanism used to fund the project, Support Which Implements Fast Transitions (SWIFT), was also used in Afghanistan. SWIFT is an administrative arrangement under which USAID can contract vetted suppliers to implement services quickly.

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environmental conditions, evaluation of environmental impacts, recommended mitigation activities, and impact-review instructions and forms.

The first set of program activities was given a categorical exclusion and the second, a negative determination with conditions. The review included procedures for minimizing or mitigating negative impacts discussed and referred to *Environmental Guidelines for Small Scale Activity in Asia Near East* (USAID n.d.), *Humanitarian Charter and Minimum Standards in Disaster Response* (Sphere Project 2004), and *Low-Volume Roads Engineering: Best Management Practices Field Guide* (Keller and Sherar 2003).

The review document said that the project had failed to follow USAID requirements for the use of pesticides by not earlier completing a PERSUAP. As a result, any pesticide use or training about pesticide use in the first set of activities was given a deferral, that is, a further review of activities was needed before any program activity could involve pesticides in any way.

The review document, which USAID staff drafted, was submitted for approval in mid-June and was approved by USAID on July 11, 2007.

DISCUSSION

The four environmental-review documents had similar structures, as expected in a standardized process, and likely drew on more detailed program descriptions. At the same time, the level of detail in the review documents varied; some documents, such as that on Uganda, were specific, and others, such as those on Afghanistan and West Bank/Gaza, were fairly general.

Use of categorical exclusions

The reviews made considerable use of the categorical exclusion option. For some programs, most of the planned activities were given categorical exclusions.

But the potential for cumulative and indirect impacts suggests a possible flaw in applying categorical exclusions. For example, former soldiers can be taught, under an activity covered by a categorical exclusion, how to make furniture to improve their livelihoods and fill a market need. The wood they use can come from local forests, which survive a conflict relatively undisturbed only to be overexploited because of increased demand for furniture and capacity to produce furniture created by the training program. The Indonesia review attempted to address indirect effects by providing boats only to previous boat owners. Similar consideration of indirect or cumulative impacts was not obvious in the other reviews.

Avoiding a positive determination

That none of the reviews resulted in a positive determination probably reflects three characteristics of the projects. First, they all involved routine activities such

as repairing buildings or training. None of the projects involved building a large dam, opening virgin lands, or digging a mine, all efforts that would likely trigger a positive determination and require funding by international financial institutions or the private sector.¹⁰

Second, all the reviews incorporated mitigation measures for potential negative impacts or, in the case of West Bank/Gaza, because of a negative determination with conditions. Including mitigation measures accomplished the following:

- Lessened the likelihood of a positive determination.
- Reduced the likelihood of a negative determination with conditions, which is, in effect, a positive determination that can be resolved without a full environmental review.

The identification and resolution of environmental problems at the design stage is good practice. More importantly for the post-conflict situation, preemptive action on environmental issues can reduce the time needed for an environmental review and reduce delays in project implementation.

Third, the work and time burden that a positive determination can impose probably dissuaded project designers from selecting activities that could prompt a full assessment. Whether the threat of a positive determination prevented the selection of more effective activities than those actually chosen is unclear.

Flexibility through the use of standard references and guidance

The reviews indicated the extent to which USAID uses standard references and formats to guide the post-review process. As is common in USAID environmental reviews of projects in more peaceful parts of the world, several of the documents mentioned use of a PERSUAP to manage selection and application of pesticides.

Reference was also frequently made to standardized guidance, for instance the *Environmental Guidelines for Small-Scale Activities in Africa* (USAID 2007a) and the online resource *Environmental Guidelines for Small Scale Activity in Asia Near East* (USAID n.d.). Incorporation of these resources into the review document (as well as project documents) avoids the need for each program to develop guidance and procedures and saves time and effort in design and implementation.

The use of standard references and guidance also allows flexibility, which is useful after a conflict when projects must be implemented rapidly. Applying standard guidance to Afghanistan and the West Bank/Gaza, where specific activities were not identified in advance, led to identification of potential negative impacts and mitigation measures to be used in program implementation.

⁹ None of the projects involved demining, which can open previously closed areas to exploitation and necessitate an extensive environmental review.

Structures for monitoring and evaluation

The USAID process also emphasizes regular monitoring, evaluation, and reporting. Although the monitoring varied in the four cases studied, it usually required completing the following:

- A separate environmental-review document for each activity before it began (for example, before rehabilitation of a road).
- An environmental review of every subproject, particularly when activities were not detailed in the initial review (for example, West Bank/Gaza).
- Regular reporting on a set of impact indicators, continuing the environmental review and monitoring during program implementation.

A progressive review also makes decisions on negative determinations with conditions easier because follow-up monitoring catches problems that might arise during a project.

Continual monitoring also allows program implementers more flexibility in designing activities and leads to a regular review of environmental impacts, as in Afghanistan and West Bank/Gaza. Flexibility is useful in post-conflict situations where there may be no time to generate the detailed program designs that are common in development assistance in situations not affected by conflict.

Post-conflict, peacebuilding, and environmental reviews

Uganda and Indonesia are clearly in the post-conflict period, while Afghanistan and West Bank/Gaza face ongoing conflict. Although the projects in all four areas aim to support peacebuilding, the Ugandan and Indonesian programs focus on building peace after a conflict, whereas those in Afghanistan and West Bank/Gaza concentrate on creating conditions for peace during conflict.

The Afghanistan, Indonesia, and West Bank/Gaza reviews tend to emphasize types of intervention, not locations and methodologies, and the need for quick approval and implementation. Clearly, urgent mid-conflict or immediate post-conflict environmental reviews have less information to work with and rely more on monitoring during a project to ensure that project activities comply with the review and good environmental practice. The case cited in the West Bank/Gaza review, in which a previous instruction to conduct a review of pesticide use was not followed, indicates that ongoing monitoring may not always be effective.

Compliance with local environmental-review procedures

Although national and local environmental governance structures in post-conflict countries may be weak, international assistance organizations—specifically, non-governmental organizations and contractors—are generally obliged to follow the laws of countries where they work. However, not all of the reviews presented

in this chapter considered local environmental conditions and environmental regulations.

Complying with host country laws should be an integral element of the USAID review process, if only to speed implementation. Furthermore, as USAID uses the post-conflict period to bolster national and local capacities to manage environmental issues, the apparent failure to follow host-country laws is notable.

Beyond the natural environment

The four reviews focused primarily on the effects of recommended activities on the natural environment. None discussed links between the proposed actions and the potential social, economic, security, and political aspects associated with environmental impacts in the target locations. For example, the Afghanistan review did not cover the impact of repairing roads on illicit activities such as increased timber harvesting. The links may be covered in other USAID documents, but their absence made the reviews less thorough.

CONCLUSION

The four USAID environmental reviews covered in this chapter demonstrate that international assistance organizations can establish standard processes to conduct rapid environmental reviews, which do not delay project implementation. Four strengths of the USAID environmental-review process include a clearly defined process with well-trained staff and compliance; flexibility regarding the amount of information needed for a review; continual monitoring and review of environmental issues during project implementation; and the use of standard references and forms to guide the review process and help in implementing activities in an environmentally sound manner.

The USAID approach, nonetheless, faces several challenges. First, the extensive use of categorical exclusions may result in overlooking indirect and cumulative impacts. Although harmful environmental impacts may be identified and mitigated during the USAID monitoring process, identification of the impacts in advance might prevent them in the first place.

Second, the USAID process is labor intensive. Only individuals with specific skills and training can conduct the reviews, and they are not always available when needed. Finding individuals willing to work in demanding, often dangerous post-conflict situations is many times difficult. Moreover, USAID requires both project implementers and USAID staff to monitor programs regularly while working in difficult post-conflict environments.

Third, the assessment process seems generally limited to the physical impact of planned activities and does not consider social, economic, security, and political linkages, even though they should be examined during an environmental review, particularly when weighing indirect and cumulative impacts and cost-benefit

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trade-offs. Expanding the USAID process to consider these linkages would reduce unanticipated and unintended negative outcomes of international assistance.

Finally, as shown by the four case studies, USAID does not seem to systematically collaborate with local structures or necessarily observe local regulatory requirements when conducting rapid environmental reviews for development projects in conflict-affected situations. Opportunities to strengthen conflict-affected governments through peacebuilding are therefore lost.

The degree to which target populations were consulted during the reviews or on the environmental trade-offs incorporated into the final review decisions was not clear. Consultations with intended beneficiaries are a core principle of development assistance and should be part of the environmental-review process, even in conflict-affected countries.

Overall, USAID's environmental-review process appears well adapted for use in post-conflict situations. It does not impose long delays on implementation or demands for information not normally available from program-design documents. The process can be adopted or adapted by other organizations to help avoid negative impacts on post-conflict environments.

Indeed, if there were a uniform cross-donor process based on that of USAID, there would be a more consistent approach to identifying and addressing the potential adverse environmental impacts of post-conflict assistance. There could also be a single consolidated environmental review of similar activities funded by different donors.¹¹ A common process could also lead to more effective use of staff to serve several projects and organizations at the same time and more opportunities to involve national and local government and nonprofit sectors in reviewing and monitoring post-conflict and peacebuilding assistance. Combining environmental-review processes could facilitate and speed assistance, reduce negative environmental impacts, and certainly benefit conflict survivors. The key challenges would be coordination, consistent application, and compliance monitoring.

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¹⁰ A USAID programmatic environmental assessment (PEA) covers a set of the same or similar activities in more than one location. For an example of a PEA, see www.ehproject.org/PDF/ehkm/ivm-env_assessment.pdf.

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