

SITE-SPECIFIC ENVIRONMENTAL COMPLIANCE PLAN

The purpose of the site-specific Environmental Compliance Plan (ECP) is to ensure that subaward activities are carried out in compliance with 22 CFR 216, USAID’s implementing regulations that further the purposes of the National Environmental Policy Act (NEPA) for projects implemented abroad. The ECP shall be used in conjunction with an Environmental Report, associated with negative determinations with conditions environmental threshold decisions or Environmental Assessments, associated with positive determinations environmental threshold decisions. Environmental Reports and Environmental Assessments will result in the development of Environmental Mitigation and Monitoring Plans (EMMPs) for the primary project. Site-specific Environmental Compliance Plans adapt project level EMMPs to subaward activities and site-specific field implementation to ensure that environmental consequences of these activities are fully controlled.

A. PROJECT AND SITE DATA:

Project Name: <i>(as stated in the triggering IEE)</i>	
Country:	
DCN of Triggering IEE:	
DCN of Environmental Report (if applicable):	
Project Name:	
Type of Project:	
Site Name:	
Name of Reviewer and Summary of Professional Qualifications:	
Date of Review:	

B. SUBPROJECT DESCRIPTION:

1. Subproject Purpose
2. Subproject Need
3. Location
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 Site (e.g. size of the facility/acreage; steps that will be taken to accomplish the activities at the site)
8. Site Map *(Provide an image from Google Earth of the location)*
9. Photos of Site

C. SITE-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
5. Proximity to Public Facilities (e.g. schools, hospitals, etc.)
6. Current Environmental Conditions in the Area of the Site

D. LEGAL, REGULATORY AND PERMITTING REQUIREMENTS

1. Please describe the national environmental impact assessment requirements for this site
2. Please list the local permits that must be obtained for this site, process for obtaining them and the schedule for obtaining them:

Permit Type	Schedule
Zoning	
Building/Construction	
Source Material Extraction	
Waste Disposal	
Wastewater	
Air	
Water Use	
Historical or Cultural Preservation	
Wetlands or Water bodies	
Threatened or Endangered Spp.	
Other	

3. Please list additional host government environmental laws or environmental standards that the site must comply with?
 - 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
4. Please describe U.S., EU, or other international standards that the Site must comply with.

E. ENGINEERING SAFETY AND INTEGRITY (Provide a discussion of any of the following issues that will or might occur as a result of this site activity—if the content does not apply to this site, please delete)

1. Have engineering designs and plans been developed by a qualified engineering?
2. Do designs and plans effectively and comprehensively address management of storm water runoff and its effects?
3. Do designs and plans effectively and comprehensively address reuse, recycling, and disposal of construction debris and by-products?

4. Do designs and plans incorporate pollution prevention measures, wherever appropriate?
5. Do designs and plans effectively and comprehensively address environmental management of mobilization and de-mobilization?
6. Are there known geological hazards such as faults, landslides and unstable soil structure that affect the site? If so, how will you ensure engineering integrity of any structures?
7. Will the site require grading, trenching, or excavation? Will the site activity generate borrow pits? If so, how will these be managed during implementation and closure?
8. Will the site activity cause interference with the current drainage system?
9. Will the site activity interfere with utility transmission such as above and below-ground cables; water, sewer and gas lines; etc.?
10. Is an emergency plan included in the engineering plans and designs?
11. Does the site activity increase the risk of fire, explosion, or hazardous chemical releases?
12. Does the site activity require disposal or retrofitting of PCB-containing equipment (e.g., transformers, florescent light ballasts, etc.)
13. Is the site activity associated with occupational safety and health hazards? If so, has a health and safety action plan been developed?

F. ENVIRONMENTAL CONSEQUENCES (Provide a discussion of any of the following issues that will or might occur as a result of this site activity—if the content does not apply to this site please delete)

1. Potential Impacts to Public Health and Well-being

- a. Will the site activities require resettlement of any portion of the surrounding community?
- b. Will area residents and/or workers be exposed to pesticides, fertilizer, or other toxic substances as a result of farming or manufacturing?
 - If so, how will you ensure that these chemicals do not penetrate into ground water or flow into surface water?
 - If so, how will you ensure that workers wear protection clothing to prevent exposure?
 - If so, what measures will be taken to control releases of these substances to air, water, and land?
 - If so, how will the site be restricted to remove the potential for human exposure?
- c. Will the site activity generate wastes from pesticides, chemicals or industrial wastes that will contaminate ground and surface water supplies used for bathing and drinking water?
- d. Will the site activity result in odor or noise from livestock facilities that may disturb local communities or contaminate surface or groundwater?
- e. Will the site activity generate wastes including construction debris, dry or wet cell batteries, florescent tubes, aerosol cans, paint, solvents, etc.? If so, how will this waste be disposed of?
- f. Do site activities require the removal of asbestos-containing building materials or include the use of building materials that may contain asbestos, formaldehyde, or other toxic materials? Can you certify that building materials are non-toxic? If so, how will these wastes be disposed of?
- g. Does the site activity provide a new source of drinking water for a community? If so, how will you monitor the new drinking water source to ensure that it is free of contaminants that may harm human health?

- h. Will construction or refurbishment activities associated with demolition or blasting result in increases in noise, air and light pollution due to increased traffic, construction operations and increase in light that will be disturbing to the surrounding community?
- i. Does the site activity generate sewerage wastes? If so, how will this be controlled?
- j. Will the site activity involve burning of wood or biomass for cooking? If so, please describe the ventilation system?

2. Land Use Changes and Impacts

- k. Will the site activity convert fallow land to agricultural land?
- l. Will the site activity convert forest land to agricultural land?
- m. Will the site activity convert agricultural land to urbanized area?
- n. Will chemical containers be stored at the site?
- o. Will the site activity generate solid wastes that will be deposited to land resources?
- p. Will the site activity generate solid or hazardous wastes such as construction debris, dry or wet cell batteries, florescent tubes, aerosol cans, paint, solvents, etc.?
- q. Does the site activity generate medical wastes? If so, how will it be handled onsite and disposed of offsite?
- r. Will the site activity require onsite storage of liquid fuels or hazardous materials in bulk quantities?
- s. Will the site activity result in mineral extraction such as granite, limestone, coal, lignite, oil, gas?
- t. Will the site activity alter the view shed of the area community or residents?

3. Water Use Changes and Impacts

- a. How far is the site located to the nearest river, stream or lake?
- b. What is the depth to groundwater at the site ?
- c. Will the site activity result in an increase in groundwater extraction? If so, what is the volume?
- d. Will the site activity result in an increase in surface water withdrawals? If so, what is the volume?
- e. Does the site activity result in increased storm water run-off?
- f. Will the site activity result in the runoff of pesticides, fertilizers or toxic chemicals into surface water?
- g. Will the site activity result in fertilizer, pesticide and toxic chemical contamination of groundwater?
- h. Will the site 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?
- j. Is there potential for discharges of waste water or potentially contaminated (including suspended solids) storm water from the site?
- k. Will the site activity disturb wetland, lacustrine, or riparian areas?

4. Impacts to Forestry, Biodiversity, Protected Areas and Endangered Species

- a. Is the site located in an endangered or threatened species habitat? Is there a plan for identifying endangered or threatened species during site activity implementation? If such species are identified during implementation, describe the process for notifying authorities?
- b. Is the site located in a migratory bird flight path?
- c. Is the site located adjacent to a protected area, national park or wildlife refuge?
- d. Will the site activity generate an increase in carbon emissions?
- e. Will the site activity involve decommissioning of systems that contain ozone depleting substances?
- f. Will the site activity alter the area's microclimate?
- g. Will the site activity involve harvesting of non-timber forest products such as mushrooms, medicinal and aromatic plants (MAPs), herbs, and/or woody debris?
- h. Will the site activity involve tree removal or logging? If so, please describe.

5. 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 preservation plan addressing these?

G. SITE CLOSURE AND HAND OVER

1. If this site activity involves construction or renovation, what phases are involved (mobilization, site preparation and staging; implementation; waste disposal; site restoration; closure; handover; etc.)?
2. Please briefly described the environmental impacts that must be addressed during each of the phases?
3. Will the host country recipient organization have the capacity to sustain the environmental management aspects of the site activity after closure and handover?

H. Site-specific Environmental Mitigation and Monitoring Plans

The Site-specific EMMP should track EMMPs developed as part of a full project-level Environmental Report or Environmental Assessment. Implementers should describe here how activities differ from the project-level EMMP and include only those activities related to the specific site, using the template provided below. If there are additional activities that are not included in the project-level report or assessment, then they need to be amended to include those. Please develop Site-specific EMMPs for each activity site. Include detailed information about when and how monitoring of mitigation measures will be performed throughout the life of the site activity, and who will do it.

1. Site-specific Environmental Mitigation Plan

Activity	Identified Environmental Impacts	Are Impacts Potentially Significant?	Mitigation Measure(s)	Monitoring Indicator(s)
List all site activities or processes (e.g. asbestos roof removal, installation of toilets, remove and replace flooring) A line must be included for each activity or process that is identified.	Include a separate sub-line for each environmental impact associated with a single activity or process	Indicate (Y)es or (N)o If no, provide justification, such as: --does not exceed existing background conditions --does not exceed applicable legal limits --does not pose a risk because of low severity, frequency, or duration	Describe the mitigation measures that will offset the associated environmental impact. If mitigation measures are well-specified in the IEE, quote directly from IEE If they are not well-specified in the IEE, define more specifically here.	Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)

2. Site-specific Monitoring Plan

Monitoring Indicator(s)	Monitoring and Reporting Frequency	Responsible Party(ies)	Records Generated
Specify indicators to (1) determine if mitigation is in place and (2) successful. For example, visual inspections for seepage around pit latrine; sedimentation at stream crossings, etc.)	For example: "Monitor weekly, and report in quarterly reports. If XXX occurs, immediately inform USAID activity manager."	If appropriate, <i>separately</i> specify the parties responsible for mitigation, for monitoring and for reporting.	If appropriate, describe types of records generated by the mitigation, monitoring, and reporting process.

I. CERTIFICATION OF NO ADVERSE OR SIGNIFICANT EFFECTS ON THE ENVIRONMENT

The undersigned certifies that all foreseeable adverse or significant effects on the environment have been adequately and effectively eliminated or mitigated by this Site-Specific Environmental Compliance Plan. If new adverse effects or the need for new or improved mitigation measures are identified, I will immediately notify the USAID activity manager/COTR/AOTR.

Implementer Project Director/COP:

Date

J. APPROVAL:

_____ USAID/Project COTR/AOTR:	_____ Date
_____ Mission Environmental Officer	_____ Date

Copy Provided to (Check Box):

Bureau Environmental Officer

[EXAMPLE TEMPLATE]

RECORD OF COMPLIANCE WITH SITE-SPECIFIC ENVIRONMENTAL MITIGATION AND MONITORING PLANS

SUBJECT:	Site Name/Primary Project Name/IEE DCN Number
TO:	COTR/AOTR
COPY:	Mission Environmental Office
DATE:	

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

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

Sincerely,

Chief of Party
Implementing Partner Organization

Approved:

AOTR/COTR

Date

Mission Environmental Officer

Date

Copy Provided to (Check Box):

Bureau Environmental Officer

Mission / Project Name