Coversheet for  
 Environmental Mitigation and Monitoring Plan (EMMP)

|  |  |
| --- | --- |
| USAID Mission Strategic  Objective: | ….. |
| Activity Title: | Small Renovation Project |
|  |  |
| Project Number: | … |
| Project Name: | GHSC-PSM Warehouse Dock Repair |
| Funding Period: | … |
| Resource Levels (in US$): | … |
| Dates of Previous EMMP: | N.A. |

Status of Fulfilling Mitigation Measures and Monitoring

|  |  |  |
| --- | --- | --- |
| 🗹 Yes 🞏 No | Initial Environmental Mitigation Plan describing mitigation plan is attached. |  |
| 🞏 Yes 🗹 No | Annual Environmental Mitigation Report describing status of mitigation measures is established and attached. |  |
| 🞏 Yes 🗹 No | Certain mitigation conditions could not be satisfied, and remedial action is provided in the Environmental Mitigation Plan and Report. |  |

USAID Mission Clearance of EMP/EMR

Contracting Officer’s  
Technical Representative: Date:

(Manish Kumar)

Mission Environmental Officer: Date:

(Ryan D. Knight)

Regional Environmental Advisor: Date:

(Paul Schmidtke)

Acronyms and Abbreviations

CFR Code of Federal Regulations

IEE Initial Environmental Examination

PPE personal protective equipment

EMMP Environmental Mitigation and Monitoring Plan

USG U.S. Government

USAID U.S. Agency for International Development

Environmental Mitigation Plan/Report Narrative

# Background

The Global Health Supply Chain – Procurement and Supply Management (GHSC-PSM) project is a USAID program implemented by Chemonics Foundation Haiti. GHSC-PSM endeavors to supply Haitian citizens with lifesaving pharmaceutical and medical supplies and simultaneously build the capacity of government organizations and agencies, health care facilities among others. The goal of GHSC-PSM is to ensure uninterrupted supplies of health commodities in support of United States Government (USG)-funded public health initiatives around the world.

This Environmental Mitigation and Monitoring Plan and Report (EMMP) has been prepared, to provide an overview of the existing conditions of the environment in the site potential activities and their potential impacts, key issues associated with these activities, recommendations for measures necessary to mitigate the potential impacts, and a monitoring framework for the mitigation measures. This document presents the EMMP.

# Description of Activities

## Project Activity Categories

The Project will include the following categories of activities:

* Demolition: demolition of concrete slab
* Construction and rehabilitation: Minor construction and rehabilitation on new concrete slab
* Plumbing:Plumbing upgrades will consist of addition, replacement or repair of existing fixtures and /or piping.

## Project Activities

The activities under the Project will include:

* Demolition of selected area
* Pouring of concrete on floor
* Repairing or replacing plumbing features including pipes, adding of fixtures.

## Project Phasing

The activities under the GHSC-PSM Warehouse Dock Repair will be phased as shown in Table 1.

Table 1: Project Implementation Phases

|  |  |  |
| --- | --- | --- |
| No. | Phase | Responsible Party |
| 1 | Planning and design | Chemonics |
| 2 | Launch of the RFP | Chemonics |
| 3 | Procurements (bidding and awarding) | Chemonics |
| 4 | Kick-off meeting | Chemonics /Construction Contractor |
| 5 | Implementation Plan | Construction Contractor |
| 6 | Review and Update of final design documents | Construction Contractor |
| 7 | Site and civil works | Construction Contractor |
| 8 | Installation of Mechanical and Electrical components | Construction Contractor |
| 9 | Environmental Compliance | Construction Contractor |

# Environmental Baseline

The project site is in Fleuriot Industrial Park in Port-au-Prince.

The project is a small scale project. For this reason, we estimated that an environmental assessment was not necessary. Nevertheless, some observations have been achieved in order to determine the existence of surface water and biodiversity.

Those observations show that there are no river next to the construction site and no biodiversity spot in the area.

# Potential Environmental Impacts

As described above, the GHSC-PSM Warehouse Dock Repair project will include only small-scale renovation and reconstruction activities, and potential environmental impacts are therefore expected to be minor and temporary. The most significant potential impacts are noise and dust generated by equipment and work, and construction waste that must be properly disposed of.

The contractor will complete an environmental screening form (see Tables 2a and 2b) for the project site to identify any additional site-specific environmental impact considerations.

## Contamination of Soil and Water

Contamination of soil and water could be caused by the open discharge of contaminants such as toilet waste and other toxic materials that are often used in construction (e.g., solvents, paints, vehicle maintenance fluids, fuels). If these contaminants are dumped or washed into streams, they may contaminate ground or surface water supplies, harming the health of the local community and populations living downstream.

Water quality (both surface and ground water) may be negatively affected by improper construction of sanitation facilities and/or disposal of sewage, hazardous waste spills during construction and/or demolition, pipe leaks or breaks, and failure of sewage systems. Sanitary infrastructure improvements, such as pit latrines or septic systems, have the potential to leak and leach into nearby surface and groundwater water sources.

## Waste Management

Activities at construction sites will produce construction waste such as cement bags, paint drums, brick and concrete rubble, metal, broken glass, timber waste, and debris. Demolition of existing block wall will generate noise and dust as well as rubble that will be required to be properly disposed of in a timely fashion.

## Air Quality and Noise

Demolition of existing walls may generate dust that will affect air quality and noise. The presence of workers and their tools will increase the ambient noise level during work hours.

The equipment that is used for demolition and construction will generate dust and noise for approximately 1 day, and the employer working near the work site may be affected.

## Human Health and Sanitary Conditions

The presence of workers and the work activities during project implementation will require additional water and sanitation services. Inadequate water and sanitation services for the workers could lead to the contamination of the water table and/or to breeding of disease-carrying vectors, odors, and other health and environmental hazards.

The movement of project workers and vehicles during construction has the potential to affect staff, as well as the aesthetics of the environment. Furthermore, the handling, storage, and use of construction materials and products (e.g., solvents, caulk, paints, glue, epoxy) may temporarily affect the air quality inside the facilities that are under improvement and may negatively affect staff.

# Environmental Mitigation

In order to mitigate the impacts of the GHSC-PSM Warehouse Dock Repair project, Chemonics will provide the selected Construction Contractors with the EMMP Mitigation Plan (Table 3) that will describe the mandatory program-level mitigation measures that require implementation. Subsequently, through use of the site specific Environmental Monitoring and Evaluation Tracking Table (Table 4), Chemonics will track the effectiveness of the Construction Contactor’s compliance with these mitigation measures as well as identify recommended adjustments or new mitigation measures that are needed. The environmental management approach will incorporate the following considerations and guidelines:

* Develop design documents and specifications that are based on national and international technical and environmental standards, as well as USAID Sector Environmental Guidelines (USAID Small-Scale Construction guidelines and Water and Sanitation Projects guidelines will be used as appropriate; <http://www.usaidgems.org/sectorGuidelines.htm>)
* Ensure that facility improvements are designed, performed, and maintained by qualified professionals
* Use non-lead based paints
* Dispose of excess materials and construction debris at an approved facility in a timely fashion
* Provide potable water and appropriate sanitary and solid waste disposal facilities for use by the temporary workers
* Provide public pedestrian protections such as barrier fences and sidewalk sheds in accordance with local building code and international best practices
* Provide adequate standard safety equipment and personal protective equipment (PPE) for the workers
* Control access at all sites to limit unauthorized individuals from entering the construction or renovation area
* Manage traffic control patterns around construction areas for the safety of health care workers, and staff
* Establish relationships within the staff to encourage the proper maintenance of newly constructed or rehabilitated infrastructure
* Discuss plans and designs with Chemonics’s Architect, to ensure that any newly designed plan is environmentally friendly.

Table 2a: Environmental Screening Form

|  |  |  |
| --- | --- | --- |
| **Name of Activity:** GHSC-PSM Office rehabilitation | **Contractor/Grantee:** |  |
| **Type of Activity:** Small-Scale Renovation Work | **Date:** |  |
| **IEE/ETD #:** …. |  |  |

| Screening Category | Screening Question | | Column A: Yes | Column B: No | Column C: If yes, is it a--? | |
| --- | --- | --- | --- | --- | --- | --- |
| High Risk | Medium Risk |
| Impact on Natural Resources and Communities | 1 | Will the project involve construction1 and/or reconstruction/rehabilitation of any type of structure (e.g., building, check dam, walls)? | X |  |  | X |
| 2 | Will the project involve new construction2 and/or the repair, reconstruction, or rerouting of roads or trails? |  | X |  |  |
|  | 3 | Will the project involve the use of, involve plans to use, or involve training in the use of any chemical compounds such as pesticides3 (including neem), herbicides, paint, varnish, and lead-based products? |  | X |  |  |
|  | 4 | Will the project involve the construction or repair of irrigation systems? |  | X |  |  |
|  | 5 | Will the project involve training and/or implementation of agricultural practices/production including animal husbandry? |  | X |  |  |
|  | 6 | Will the project involve the construction or repair of fish ponds? |  | X |  |  |
|  | 7 | Will the project involve the disposal of used engine oil? |  | X |  |  |
|  | 8 | Will the project involve implementation of timber management4 extraction of forest products, clearing of forest cover, and/or conversion of forest land? |  | X |  |  |
|  | 9 | Are there any potentially sensitive terrestrial or aquatic areas near the project site, including protected areas, wetlands, critical wildlife habitat, and nesting areas? |  | X |  |  |
| Impact on Natural Resources and Communities (cont.) | 10 | Will the project generate discharge pollutants such as airborne gases, liquids, and solids? | X |  |  | X |
| 11 | Will the waste generated during or after project implementation affect the neighboring surface or groundwater? | X |  |  | X |
| 12 | Will the project create objectionable odors? | X |  |  | X |
| 13 | Will the project violate air standard? | X |  |  | X |
|  | 14 | Will the project occur on steep slopes (slopes greater than 15%)? |  | X |  |  |
|  | 15 | Will the project contribute to erosion? |  | X |  |  |
|  | 16 | Is the project incompatible with existing land use in the vicinity? |  | X |  |  |
|  | 17 | Will the project contribute to displacement of people (housing) or businesses? |  | X |  |  |
|  | 18 | Will the project affect unique geologic, physical, cultural, and/or historic features? |  | X |  |  |
|  | 19 | Will the project have potential impacts to inhabitants, natural landscapes, or flora/fauna downstream from the project site? |  | X |  |  |
|  | 20 | Will the project contribute to a change in the amount of surface water in any water body? |  | X |  |  |
|  | 21 | Will the project have a direct or indirect impact on, or include actions involving, mangroves and coral reefs? |  | X |  |  |
|  | 22 | Will the project expose people or property to flooding? |  | X |  |  |
|  | 23 | Will the project contribute substantial reduction in the amount of groundwater otherwise available for public water supplies? |  | X |  |  |
|  | 24 | Does the project/activity involve a sub grant component? |  | X |  |  |
| Environment and Health | 25 | Will the project create conditions that will encourage an increase of waterborne diseases or populations of disease-carrying vectors? |  | X |  |  |
| 26 | For road rehabilitation as well as water and sanitation grants, has a maintenance plan been submitted? |  | X |  |  |
|  | 27 | Will the project generate hazards or barriers for pedestrians, motorists, or persons with disabilities? |  | X |  |  |
|  | 28 | Will the project increase existing noise levels? | X |  |  | X |
|  | 29 | Will the project involve the disposal of syringes, gauzes, gloves, or other biohazard medical waste? |  | X |  |  |
| Local Planning Permits | 30 | Does the project involve infrastructure improvements or other types of improvements that require local planning permission(s)? |  | X |  |  |
| 31 | Does the project meet the national building code (e.g., infrastructure improvements)? | X |  | N/A | N/A |
| Gender5 | 32 | Will men and women benefit disproportionately or will they be involved unequally in the project? |  | X |  |  |
|  | 33 | Will the project inhibit the equal involvement of men and women? |  | X |  |  |
|  | 34 | Are there factors that will prevent women’s participation in the project? |  | X |  |  |
| 1 Construction projects need to be reviewed for scale, planned use, building code needs, and maintenance. New construction with a footprint greater than 1000 sq meters or 10,000 sq ft is considered large scale and high risk. Some small construction projects, such as building an entrance sign to a park, may require simple mitigations whereas larger buildings will require more extensive review and monitoring.  2 New construction of roads and trails are considered high risk and will require a full environmental assessment of the planned construction (i.e., a Positive Determination). Any reroutes of a road or trail longer than 100 meters is considered high risk. Reroutes within a protected area, nearby a water source/wetlands, and/or archeological site are considered high risk.  3 The purchase of packaged store pesticides is included. The planned involvement of pesticides will trigger the need to develop a Supplemental Initial Environmental Examination that meets USAID pesticide procedures (Pesticide Evaluation Report and Safer Use Action Plan) for the project.  4 Any activities that involve harvesting trees or converting forests are considered high risk and will require a full environmental assessment of the activity (i.e., Positive Determination).  5 If the project/activity includes a subgrant component, each subgrantee will be required to prepare an EMPR prior to implementation of the subgrant. | | | | | | |

Table 2b: Recommended Action

|  |  |  |
| --- | --- | --- |
| (a) | The project has no potential for substantial adverse environmental effects. No further environmental review is required (Categorical Exclusion). No EMP required. |  |
| (b) | The project has potential for minimal to medium adverse environmental effects, but mitigable environmental effects. Measures to mitigate environmental effects will be incorporated (Negative Determination with Conditions). EMMP Required. | X |
| (c) | The project has potentially substantial or significant adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared (Positive Determination). No EMMP required. |  |
| (d) | The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required (Deferral). |  |
| (e) | The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding. |  |

Table 3: Mitigation Plan

| No.1 | Subactivity or Component | Description of Impact | Mitigation Measures |
| --- | --- | --- | --- |
| 1, 3, 10, 11, 30, 31 | Small construction/ renovation of facilities |  |  |
| (a) Risk of injury to construction workers, staff. (b) Contamination from hazardous substances (e.g., paints, lubricants, fuels) | (a) Develop a health and safety plan that incorporates the safety of workers  (b) Provide and/or require appropriate PPE for workers, including hardhat, gloves, closed-toe boots, and other equipment as necessary, and require their use for high-risk activities  (c) Ensure Construction Contractor’s Health and Safety Plan includes provisions for effective storage of hazardous materials that are required for on-site construction activities including appropriate primary and/or secondary containment, as well as, proper clean up equipment and disposal plans for leaks and/or spills (appropriate measures dependent upon volume of substance, project duration, on-site uses and site specific environmental conditions) |
| Renovation work undertaken in buildings has potential to cause inconvenience or even injuries to staff | (a) Cordon off areas under construction  (b) Ensure good housekeeping and clean operations and immediately remove any rubble strewn outside construction areas  (c) Limit verbal noise or other forms of noise during renovation work inside medical and school buildings  (d) Use screens, tarps, or nets to avoid flying debris and dust |
| 10, 11, 30, 31 | Waste management | Activities at construction sites will produce additional construction waste and in some cases disposal will pose a threat to the environment (cement, paints, lubricants, fuels, and detergents) | (a) Cover collection and transfer vehicles along the route of transport to avoid windblown litter  (b) Ensure that vehicle maintenance plans provide for monitoring and replacement of covers and tarps as required  (c) Seek guidance of local environmental officers to identify acceptable disposal sites and/or seek out best available disposal practices through. Consider recycling or transport to better suited non-local disposal sites as feasible  (d) Separate hazardous and non-hazardous waste at the source  (e) Ensure Construction Contractor’s Health and Safety Plan includes provisions for effective storage of hazardous materials that are required for on-site construction activities including appropriate primary and/or secondary containment, as well as, proper clean up equipment and disposal plans for leaks and/or spills (appropriate measures dependent upon volume of substance, project duration, on-site uses and site specific environmental conditions) |
| 13 | Demolition, installation, and minor construction | (a) Sedimentation of surface water bodies  (b) Nuisance or endangerment of neighbors due to noise, dust, and debris  (c) Injury from falling or flying debris when demolishing walls | (a) Comply with work scope requirements and submit plans to minimize noise and dust impacts  (b) Apply water to minimize dust  (c) Cover rubble and soil in trucks during transport  (d) Dispose of waste in designated locations  (e) Provide spotters to ensure that falling or flying debris from work activities does not endanger surrounding pedestrians |
| 10, 11, 12 | Painting | Production of toxic substances such as lead and volatile organic compounds | (a) Provide adequate respiratory protection to all workers including organic vapor relief/dust masks if working in confined spaces  (b) Use non-hazardous (non-lead based) paints and chemicals and ensure proper ventilation  (c) Ensure Construction Contractor’s Health and Safety Plan includes provisions for effective storage of hazardous materials that are required for on-site construction activities including appropriate primary and/or secondary containment, as well as, proper clean up equipment and disposal plans for leaks and/or spills (appropriate measures dependent upon volume of substance, project duration, on-site uses and site specific environmental conditions) |
| 1, 3, 17 | Temporary disruption of services | Facilities under renovation will not be closed and work activities may cause disruptions to normal work hours or activities. | (a) Plan pre-construction meetings and activities early to identify suitable rooms or adjoining buildings into which to relocate staff with minimal inconvenience.  (b) Phase the rehabilitation so the entire facility is not disrupted at once |
| 28 | Noise | Noise and vibration caused by machines, site vehicles, pneumatic drills, etc. | (a) Minimize the use of heavy-duty equipment  (b) Limit noisy operations to certain times  (c) Limit noise levels to within an acceptable level |
| 10, 11 | Solid waste production | (a) Disease transmission/vector generation  (b) Contamination of soil and water  (c) Impacts to aesthetic environment | (a) Provide on-site sanitary measures for capture and containment during construction (e.g., latrine, portable toilet)  (b) Dispose of solid waste at municipally approved location in a timely manner  (c) Ensure that runoff from waste areas and debris piles does not affect soil or water resources |
| REHABILITATION OF GHSC-PSM OFFICES | | | |
|  |  |  |  |
|  |  |  |
|  |  |  |
| 1 Numbers indicate screening questions in Table 2a | | | |

Table 4: Environmental Monitoring and Evaluation Tracking Table

|  |  |  |
| --- | --- | --- |
| **Type of Project:** Small-Scale Renovation Work  **Project Name:** Rehabilitation of theGHSC-PSM offices  **Implementing Organization:** Chemonics | **Location Name: Fleuriot, Port-au-Prince**  **Project Size: 277m2**  **Nearby Communities:** | **Senior Project Manager:**  **Monitoring Period:** Rehabilitation Period  **Date:** — |

| # | Mitigation Measure | | Responsible Party | Monitoring Methods | | | Est.  Cost | Results | | | Recommended Adjustments | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Indicators | Methods | Frequency | Dates Monitored | Problems Encountered | Mitigation Effectiveness |
| 1 | Contractor Health & Safety Plan (H&SP) | | Generated by Construction Contractor / Approved by Chemonnics | * H&SP developed and approved * Contractor trains employees on H&SP * H&SP posted and enforced by Contractor | * Contrator H&SP reviewed for quality and conformance with Mitigation Plan; approved by Chemonics * Chemonics site inspections | * H&SP review and approval prior to construction * Weekly or bi-monthly site inspections to ensure H&SP enforcement | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 2 | Chemonics Site Monitoring / Quality Assurance (QA) Plan | | Chemonics / Contractor | * Contractor work quality meets Chemonics project specific QA guidelines * Completeness of QA Plan (photos, site inspection remarks, construction schedule updates) | * Chemonics weekly site inspections * Photos, remarks, and/or construction deadlines | * QA Plan generated prior to construction * Weekly or bi-monthly inspections * Weekly or bi-monthly submittals to USAID | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 3 | Personal protective equipment (PPE) for workers including gloves, boots, vests, and respiratory protection | | Chemonics / Contractor | * Construction contractor has trained employees on proper use and maintenance of PPE * Chemonics has provided customized training support to Construction Contractor on as needed basis * Workers use of appropriate PPE | Site inspections | * Weekly or bi-monthly inspections * Remarks/reporting on H&S conditions included in Chemonics weekly or bi-monthly QA Plan submittals to USAID | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 4 | Waste segregated at source to separate hazardous from non-hazardous waste | | Chemonics / Contractor | Suitable waste storage receptacles and disposal areas identified and used | Photos, inspection, and/or installation of appropriate waste receptacles and determination final of waste disposition | * Weekly or bi-monthly inspections | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 5 | (a) Non-hazardous (non-lead based) paints and chemicals  (b) Proper ventilation | | Chemonics / Contractor | * Technical specification for paints * Areas of use properly ventilated * Workers wear proper PPE | Site inspection | * Weekly or bi-monthly inspections | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 6 | Eliminate or reduce nuisance issues (dust, noise, odors) | | Chemonics / Contractor | * Reported complaints from staff * Unacceptable levels of dust, noise or odors observed during site inspection | Site inspection | * Weekly or bi-monthly inspections | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 7 | (a) Plan pre-construction activities early to identify suitable rooms or adjoining buildings into which to relocate services with minimal inconvenience  (b) Renovation will be in phases so that the whole facility is not disrupted at once | | Chemonics / Contractor | Project baseline schedule developed and coordinated with office | Baseline Project Schedule submitted | Prior to construction | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 8 | Ensure good housekeeping and clean operations and timely removal of rubble and debris around construction areas | | Chemonics / Contractor | * Reported complaints from staff or users related to construction waste * Area outside of construction zone clean and free of construction debris | Site inspection | Weekly or bi-monthly inspections | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 9 | Construction workers limit verbal noise or other forms of noise during renovation work inside office | | Chemonics / Contractor | * Reported complaints from staff * Posted signs | Site inspection | Weekly or bi-monthly inspections | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| 4 |  |  |  | |
| 10 | Contractors use screens or nets to avoid flying debris and dust | | Chemonics / Contractor | Reported accidents, health issues, or complaints from staff | Site inspection | Weekly or bi-monthly inspections | N/A | 1 |  |  |  | |
| 2 |  |  |  | |
| 3 |  |  |  | |
| REHABILITATION OF GHSC-PSM OFFICES | | | | | | | | | | | | |
| 11 | | Sanitation and Hygiene measures | Chemonics/ Contractor | * Reported accidents, health issues, or complaints from workers * Temporary and permanent latrines or toilets are not a source of contamination to natural resources or contributing to human health impacts | * Site inspection * Facility user survey | Weekly or bi-monthly inspections | N/A | 1 |  |  | |  |
| 2 |  |  | |  |
| 3 |  |  | |  |
| 4 |  |  | |  |
| 12 | | (a) Facility improvements designed, performed, and maintained by qualified professionals  (b) Minimize use of heavy machinery to prevent erosion, noise, and air pollution  (c) Disposal of construction waste/excavated materials at controlled sites with provisions for groundwater and surface water protection | Chemonics / Contractor | * Septic effluent leaking into nearby water bodies or foul odor is noted * Signs of erosion around construction and/or borrow pitsites * Nuissance issues reported or observed * Uncontained waste or construction debris observed | Site inspection | Weekly or bi-monthly inspections | N/A | 1 |  |  | |  |
| 2 |  |  | |  |
| 3 |  |  | |  |
| 4 |  |  | |  |
| 13 | | (a) Animals not allowed to drink directly from or congregate around the water source/fountain  (b) Maintenance committee monitors drains and keeps them clear of debris | Chemonics / Contractor | Presence of broken, damaged, or clogged water distribution or drainage structures | Site inspection | Weekly or bi-monthly inspections | N/A | 1 |  |  | |  |
| 2 |  |  | |  |
| 3 |  |  | |  |
| 4 |  |  | |  |

# Photo Documentation of Site Environmental Assessments