

Step C:

**Write Conclusions,
Mitigation &
Monitoring Plan**

(Section 4 of the IEE)

Step C: Write Conclusions, Mitigation and Monitoring Plan

Note: Judging the significance of impacts

Section 4 of the IEE
requires you to judge the
SIGNIFICANCE of impacts.

Significance depends largely
on 2 factors:

- **Context** of the impact
(environmental context
AND policies, laws & local
values)
- **Intensity** of the impact


In part, this is often a
VALUE JUDGMENT



Step C: Write Conclusions, Mitigation and Monitoring Plan

Note: Judging the significance of impacts

**Contextual factors
that tend to
increase the
significance of
adverse impacts
include:**



When the impact. . .

Evinces public concern or controversy.

May set a precedent for how similar situations are addressed in future.

Affects protected habitats, land or ecosystems.

Affects habitats, land or ecosystems which may not be protected, but which are particularly valued for aesthetics, recreation, cultural reasons.

Affects resource availability critical to subsistence & livelihood.

Disrupts local customs.

Is subject to law, policy or regulation that treat the impact as a matter of particular concern.

Has a high or unknown potential impact public health and safety.

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Note: Judging the significance of impacts

Example: Context & Intensity



An improved pit latrine is planned at a new market site.

The most significant potential impact of latrines is usually the potential for groundwater contamination.

Construction impacts are typically minimal.

How can CONTEXT affect the significance of impacts?

A shallow well serving a primary school is located 10m away.

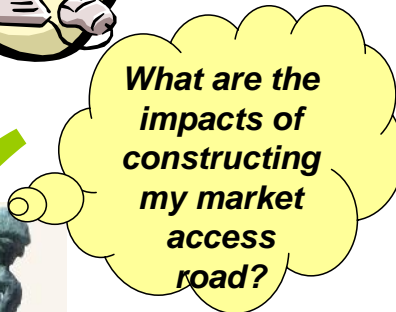
The planned site contains a sacred stone, tree or shrine.

National law requires that any potential impacts on groundwater is considered significant and requires district approval.

What about INTENSITY?

A 10-seat latrine is planned to serve 1000 persons/day

Step C: Write Conclusions, Mitigation and Monitoring Plan BEFORE YOU WRITE. . .



DON'T WRITE YET!

Step back and consider:

- *Based on your analysis. . .what recommendation seems likely for EACH activity WITHOUT mitigation and monitoring not already part of the activity design?*
- *What may change once mitigation and monitoring is added?*

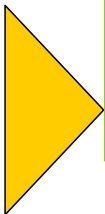
OK. . .NOW proceed to write the mitigation and monitoring plan

Step C: Write Conclusions, Mitigation and Monitoring Plan

Write the mitigation & monitoring plan

**IEE Section 3:
Evaluation of
Environmental
Impact Potential**

**IEE Section 4:
Recommended
Threshold
Decisions and
Mitigation
Actions**



A. Recommended threshold decisions and conditions
Includes justifications for any categorical exclusions.

B. Mitigation, monitoring and evaluation
Remember, mitigation & monitoring plans should specify **what, who, how much, when and why!**

! Write mitigation and monitoring BEFORE making recommended determinations!
WHY? Because mitigation should reduce the significance of impacts!

Step C: Write Conclusions, Mitigation and Monitoring Plan

Write the mitigation & monitoring plan

**IEE Section 3:
Evaluation of
Environmental
Impact Potential**

**IEE Section 4:
Recommended
Threshold
Decisions and
Mitigation
Actions**

A. Recommended threshold decisions and conditions

Includes justifications for any categorical exclusions.

B. Mitigation, monitoring and evaluation

Remember, mitigation & monitoring plans should specify **what, who, how much, when and why!**

Once mitigation and monitoring is specified, you are ready to make your recommended determinations.

REMEMBER, each activity receives one of 4 determinations.

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Recommended Determinations in the IEE

Based on IEE section 3 & 4.b, make a recommendation for EACH activity. . .

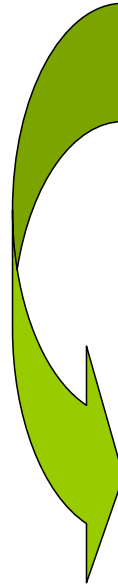
Recommendation	Reg. 216 terminology	Implications (if IEE is approved)
No significant adverse environmental impacts	<i>NEGATIVE DETERMINATION</i>	Activity passes environmental review
With specified mitigation and monitoring, no significant environmental impacts	<i>NEGATIVE DETERMINATION WITH CONDITIONS</i>	The activity passes environmental review on the condition that the specified mitigation and monitoring is implemented
Significant adverse environmental impacts are possible	<i>POSITIVE DETERMINATION</i>	Do full EA or redesign activity
Not enough information to evaluate impacts	<i>DEFERRAL</i>	You cannot implement the activity until the IEE is finalized

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Justifying categorical exclusions

If your screening results indicate that some activities qualify for **categorical exclusions**, these exclusions **must be justified in section 4.A.**

To justify a categorical exclusion, you should **cite the language in Reg. 216.2(c)(2) that creates the exclusion**



For example. . .

“Per **22 CFR 216.2(c)(2)(i)**, A categorical exclusion is recommended for **training activities**.

XXX intends to train farmers belonging to producer organizations in **financial and business management**. These activities will have no effect on the environment.”

216.2(c)(2)(i) reads. . .

“Education, technical assistance or training programs, except to the extent such programs include **activities directly affecting the environment**.”