

Duke University  
NEPA Certificate Program

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*An Evaluation of A Programmatic Environmental Assessment Approach for U.S. Funded Large Scale Programs, with application to Earthquake Reconstruction in El Salvador, Central America*

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## **I. Executive Summary**

The United States Agency for International Development (USAID) is required to follow the NEPA-based regulation Title 22 of the Code of Federal Regulations, Part 216 (22 CFR 216) resulting from an out-of-court settlement with the Environmental Defense Fund in December 1975. The regulation incorporates environmental considerations into USAID development activities on behalf of the United States. The environmental review process carried out by the U.S. Government must encompass the similarly oriented laws of the host country.

In an effort to aid the Government of El Salvador after two major earthquakes in January and February 2001, the U.S. Government, through the Agency for International Development (AID), initiated a reconstruction Special Objective. AID initiated the program for reconstruction throughout the country. A programmatic environmental assessment, per the NEPA-based 22 CFR 216 regulations, was undertaken to drive the process for site selection, providing general guidelines, identifying potential environmental concerns on selected sites and identifying site-specific mitigations. The process was lacking, however, with regards to implementation and effectiveness monitoring, public participation, and alternative development.

This paper will outline the process for developing the programmatic environmental assessment, how it was used to direct the program, public involvement, development of alternatives and lessons learned in the process that could be used in applying future environmental assessment procedures to large scale reconstruction efforts. The application of this experience to capacity building and environmental protection under the current Free Trade Agreement among the Central American nations, Dominican Republic and the United States (CAFTA-DR) will be discussed.

## **II. BACKGROUND<sup>1</sup>**

On January 13, 2001 two back to back earthquakes, the first a magnitude 7.6 and an aftershock of 6.5, occurred about 30 km off the southeastern coast of El Salvador and caused widespread destruction, landslides and fatalities throughout the country.

The earthquakes affected 1.5 million people, including 1,159 deaths and 8,100 injuries. Hundreds of thousands of homes were destroyed and 1,200 schools were either destroyed or severely damaged. Damage to health facilities totaled 122 and 990 public buildings were damaged. Thousands of kilometers of roads were damaged and potable water systems were disrupted. All of this damage brought economic activity to a standstill with impact in the hundreds of millions of US dollars. The lack of disaster preparedness exposed the institutional weaknesses, including in the areas of land use planning and disaster mitigation.

The international donor community committed US\$1.4 billion of the estimated US\$1.9 billion estimated need for reconstruction. The U.S. Government provided US\$190.5 million, much of the assistance through USAID which worked with 48 partners supported by more than 200 private contractors and local non-governmental organizations (NGO). The assistance targeted more than 1,000 affected communities located in 130 municipalities within the nine most-impacted departments of the country.

The reconstruction activities were intended to improve the standards of construction to better withstand future disasters. The assistance was aimed at mostly the rural poor in areas most devastated by the earthquakes. Results were measured in four program areas<sup>1</sup>:

- Restoration of basic community infrastructure for the rural poor, including 26,872 houses, 65 water systems for 142,098 people, 33,376 latrines, 53 schools, 30 child care centers, 7 major health clinics and other small infrastructure.
- Economic reactivation in the affected rural areas, by reconstructing 3 major municipal markets, and providing assistance to 8,100 micro, small and medium business and 16,300 farmers, which generated more than \$14 million in new exports and sales.
- Mitigation of the potential adverse effects of future natural disasters, by developing disaster mitigation plans and risk maps in 46 municipalities and strengthening the national and local capacity to mitigate the impact of future natural disasters.
- Refurbishment of municipal government infrastructure, by reconstructing 19 municipal offices.

### **III. Incorporation of Environmental Considerations to U.S. Foreign Assistance through the United States Agency for International Development (USAID)**

When the National Environmental Policy Act was signed by President Nixon in 1970, many agencies, including USAID, did not believe it to apply to activities outside the United States. It was not until 1975 when the Environmental Defense Fund sued USAID for misuse of pesticides in an agency funded Pakistani agriculture project in which five people died and 475 fell ill, that the agency agreed to develop environmental procedures as a condition in the out-of-court settlement. The result was 22 CFR 216 and is now applied worldwide for USAID funded programs. Executive Order 12114, signed by President Jimmy Carter, subsequently required all federal agencies that work internationally to develop NEPA-compliant procedures; compliance among U.S. Government agencies has been uneven.

#### **A. NEPA as applied to USAID**

22 CFR 216 procedures specifically apply to USAID and are designed to work in the development setting as specified in the USAID regulations (Automated Directives System). They are markedly different from the NEPA process followed by federal agencies within the United States. During USAID project design the team leader for the project submits an Initial Environmental Examination (IEE) to the Bureau Environmental Officer in Washington. This document provides background information, program and project descriptions, example projects activities, affected locations, applicable host-country regulations, evaluation of environmental impact potential, a suggested environmental determination and a monitoring and evaluation plan. The Bureau Environmental Officer in turn writes an Environmental Threshold Decision (ETD) that issues the determination and attaches any requirements to the project. The determinations can be 1) Categorical Exclusion, 2) Negative, 3) Negative with Conditions, or 4) Positive. The first two determinations are essentially the same and are applied to projects with no environmental effects, with the former simply fitting into a specified list in the regulations. A Negative Determination with Conditions is for projects that could

have an environmental affect, but the effects can be mitigated through an appropriate prescribed mitigation and monitoring program. A Positive Determination is made for projects that will likely have an affect on the environment and requires an environmental assessment or an environmental impact statement to be written. An environmental impact assessment is required for activities affecting the global commons and/or the environment of the United States. The signed ETD for all determinations is a legal document and one of the many pre-obligation requirements that allows the contracting process to proceed.

## **B. Application of NEPA to El Salvador Earthquake Reconstruction**

As required by 22 CFR 216, the USAID Mission in El Salvador completed an Initial Environmental Examination (IEE) of the Earthquake Reconstruction Program (ERP) on April 6, 2001. The resulting Threshold Decision for the ERP resulted in a positive determination for all activities involving construction and reconstruction and, given the scale of effort, called for a Programmatic Environmental Assessment (PEA) to be conducted for these activities. USAID/El Salvador contracted the services provided by Associates in Rural Development (ARD) to assess the environmental management structure of past efforts, the results of which served as a basis for the environmental process to be used in reconstruction. An agreement with the U.S. Army Corps of Engineers was also entered for overall implementation monitoring. The actual implementation would be through various local organizations that would submit project proposals within the scope of the reconstruction effort. Every proposal would be processed through a consistent environmental screening process reflecting the environmental issues identified in the PEA.

While the accomplishments were great and the objective of improving the baseline by “building back better” was achieved, a significant procedural weakness of the PEA was the lack of public involvement and the development of alternatives. Given the emergency nature of the situation, reconstruction was the main objective of the Salvadoran Government and the international donor community. It was assumed that most were in agreement as to the construction objectives and improved approaches. In fact many individuals were not happy when construction applications for environmentally sensitive or geologically unstable areas were denied, a decision stemming from the environmental screening tools used in the selection process. In the end, while these two basic tenants of the NEPA process were not followed from a programmatic perspective, on a site basis locations were selected and rejected based on prescribed procedural tools using informed environmental information. The projects were also solicited by the communities, so there was little doubt as to public acceptance.

## **C. Design of Environmental Guidelines for the Earthquake Programmatic Environmental Assessment (PEA)**

Sustainability was an important element in developing the PEA. In the light that environmental sustainability is intimately linked to sustainability in a development context, the intent was to negate or mitigate to the greatest extent possible any potential environmental impacts. With this in mind, the PEA approved guidelines incorporated GOES environmental regulations and permit requirements,

conditions under which a site-specific environmental assessment were required, and links between environmental mitigation and the monitoring plans.

It is much more effective and economical to identify potential impacts or problems during the planning process, so the guidelines were designed to help the user evaluate and then propose appropriate mitigation measures or further study for these problems or impacts.

The guidelines served for site selection, design, construction, and occupation. They also allowed the collection of information that is used to determine whether the activity is subject to a site-specific environmental assessment.

#### **D. Site-Specific Environmental Assessments**

When proposed activities from the implementing entity fell outside of the PEA parameters, site specific Environmental Assessments were required by the USAID Mission Environmental Officer. This applied if the particular activity was of a type that statutorily required a site specific environmental assessment or the particular activity had potential significant impacts.

#### **E. Use of GIS**

In addition to the environmental guidelines, a Geographic Information System (GIS) was integrated into the process to minimize risk in site selection during the reconstruction effort. A geographic data base to accompany the reconstruction efforts was also developed. This innovative approach integrated the mitigation measures as a planning tool, primarily used to select project sites by vulnerability criteria, thereby providing greater probability of success.

For example, a proposal for rebuilding houses in a community would be submitted from non-governmental organizations (NGO) to USAID. To guarantee the highest likelihood of success, USAID would use GIS to overlay the proposed construction area with hazards such as gradient as well as flooding and landslide susceptibility. The project proposal for reconstruction would not be accepted unless it passed the PEA-prescribed screening process, thereby providing the highest likelihood for withstanding future events. This discerning site selection process also drastically reduced the number of sites requiring mitigation measures, thereby inherently and programmatically reducing potential for environmental degradation.

#### **F. Government of El Salvador (GOES) Environmental Regulations**

El Salvador has a comprehensive environmental law per Decree Number 233 enacted in 1998. In matters pertinent to environmental analysis, it includes requirements for the creation of a national environmental management system (Chapter I), public participation in the environmental management process (Chapter II), development of environmental policy instruments (e.g. land planning, an environmental incentive and disincentive program, environmental education, application of science and technology; Chapter III), and a system for environmental evaluation (including an environmental analysis strategy, an environmental permit system, environmental audits and public consultation; Chapter IV).

Required contents of an environmental evaluation include (Decree 17, Environmental Law General Regulation):

- A. Executive Summary;
- B. Policy, plan or program description and alternatives;
- C. Characterization of the existing environment;
- D. Prediction of environmental impacts;
- E. Measures for prevention, reduction, control and compensation at the policy planning and program level;
- F. Environmental monitoring plan, when applicable; and
- G. Annexes: maps, tables, graphs, results of public consultation process.

By comparison, the U.S. National Environmental Policy Act requires an Environmental Impact Statement to include:

- A. Cover sheet
- B. Summary
- C. Purpose and Need
- D. Alternatives including the proposed action
- E. Affected environment
- F. Environmental consequences
- G. List of preparers
- H. Appendix

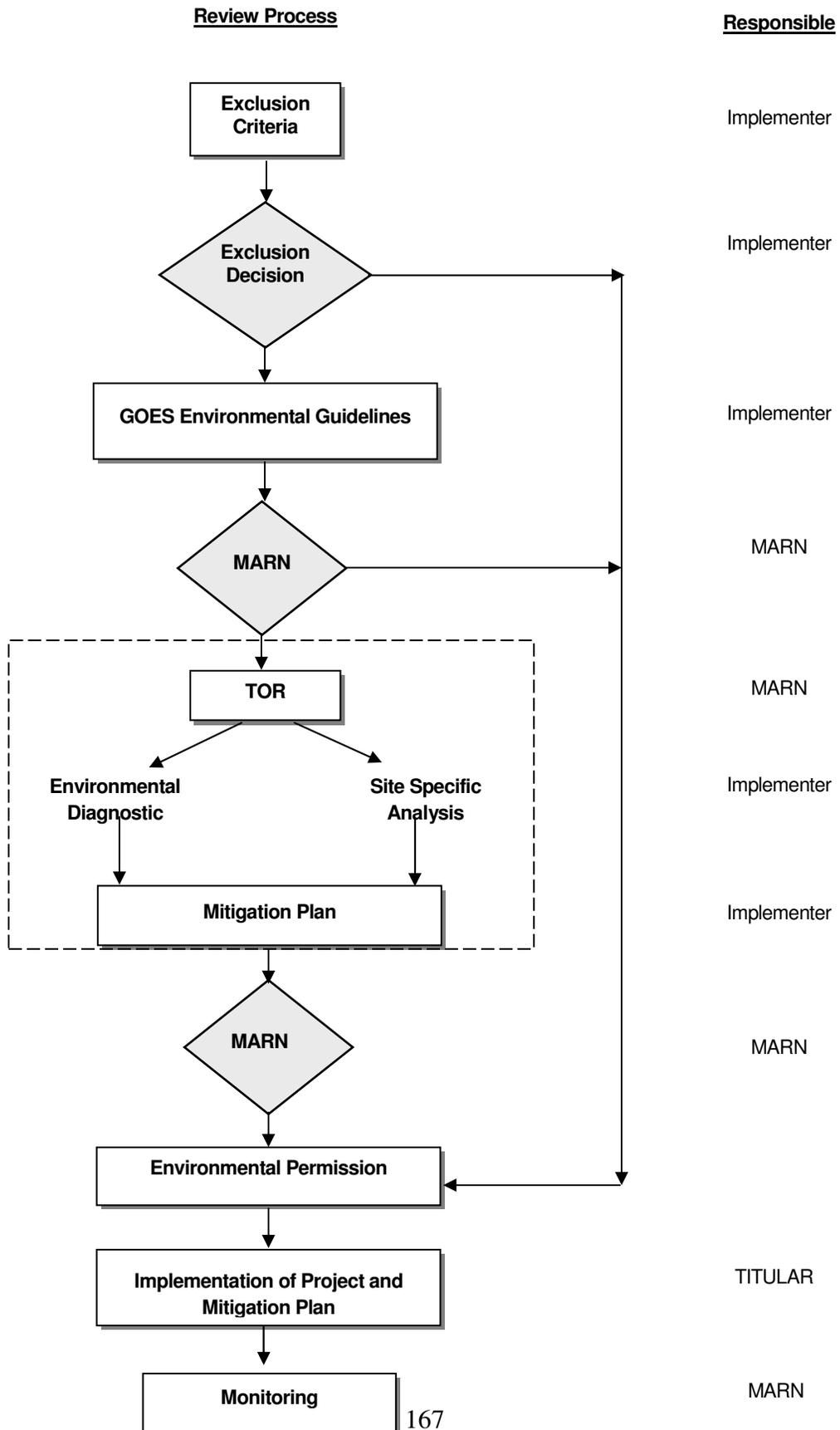
### Special GOES Environmental Process for Earthquake Reconstruction<sup>1</sup>

The GOES instituted a new procedure for Environmental Evaluation for the reconstruction activities. There were two key changes from the normal procedure. The first was the adoption of an “exclusion decision” as the first step in the process, effectively exempting most USAID- funded reconstruction activities from El Salvadoran Environmental Impact Regulations. The second change is the turnaround time required for the Ministry of Environment and Natural Resources (MARN) to render a decision on the need for an Environmental Evaluation. What was formerly a 60 to 120 day review period was reduced to 22 days.

The GOES Ministry of the Environment (MARN) adopted a simplified procedure for Environmental Impact Assessment in response to the emergency nature of the earthquake (figure 1). MARN established criteria to exclude sites from the environmental assessment process that are not threatened by natural disasters. These criteria permitted the exclusion of potentially large impacting projects from GOES environmental regulations.

No further environmental regulations were applicable and no permits required if the construction site met the exclusion criteria. If the site did not meet the exclusion criteria, GOES guidelines were used and presented to MARN, who within six days would make a determination of whether an Environmental Impact Assessment (EIA) was needed. If the GOES EIA was not required, no further environmental regulations applied, no permits were required, and mitigation measures were recommended but not ordered.

Figure 1: GOES Environmental Review Procedure <sup>1</sup>  
 (taken from the El Salvador Earthquake Reconstruction PEA)



## **G. Integration of 22 CFR 216 and the GOES Environmental Process with the Incorporation of Guidelines**

The PEA designs an Environmental Review process that incorporates 22 CFR 216 and the GOES Environmental Review procedures. The process is designed to (taken from the El Salvador Earthquake Reconstruction PEA)<sup>1</sup>:

- Ensure that both GOES and USAID Environmental regulations are obeyed;
- Ensure that a basic analysis of environmental conditions and impacts is done for ALL activities;
- Provide USAID with the flexibility to easily approve small activities of benign environmental consequence while concentrating limited resources on those activities with the highest likelihood of adverse impact;
- Allow USAID to monitor the use and progress of GOES regulations where applicable; and
- Allow USAID to order site-specific environmental assessments for complicated sites and activities.

With an eye towards integration of environmental considerations into design as a way to anticipate and prevent adverse environmental impacts, the guidelines were designed to incorporate mitigation measures into all phases of the El Salvador's Earthquake Reconstruction Program (ERP) activities, including site selection, engineering design, construction, and occupation. Some environmental issues are addressed by including components that are more obviously linked to proper construction, such as the provision of public services such as water, sanitary facilities, solid waste disposal, wastewater disposal, and access to roads, schools, health care, and public transportation. More subtle environmental quality issues not always addressed in a development context, such as contamination of soils, surface water and ground water, and deforestation, were also integrated into the process. Figure 2 outlines the integrated PEA procedure.

To provide USAID managers a consistent set of mitigation for the activities, the guidelines were organized by the type of construction activity (houses, schools, markets, hospitals, water and sanitation, etc.). The guidelines were divided into three parts: A set of guiding instructions, a field checklist/questionnaire, and a mitigation plan.

The guideline instructions contained the following information<sup>1</sup>:

- How to complete the checklist/questionnaire;
- How to analyze the environmental impacts of the project;
- How to identify appropriate mitigation measures for project implementation;
- How to determine if the site activity is subject to the GOES environmental regulations.

The actual field checklist/questionnaire contained the following<sup>1</sup>:

- General information about the project;
- Site identification and selection;
- Site design;
- Construction issues; and
- Occupation/Operational issues.

Environmental guidelines developed for construction, reconstruction, and/or rehabilitation projects under the ERP in El Salvador included <sup>1</sup> :

- Environmental Guidelines for USAID Financed Housing Projects
- Environmental Guidelines for USAID Financed School Projects
- Environmental Guidelines for USAID Financed Small Markets Projects
- Environmental Guidelines for USAID Financed Municipal Buildings
- Environmental Guidelines for USAID Financed Small Health Care Facilities
- Environmental Guidelines for USAID Financed Small Water & Sanitation Projects



## H. Monitoring Plan

The monitoring plan requirements under 22 CFR 216 are intended to ensure that environmental concerns are integrated into the project activities and mitigation measures verified for implementation and effectiveness. The plan also provides an opportunity for adaptive management and a mechanism for accountability and reward towards improving the environmental process during implementation.

*Monitoring of mitigation measures using protocol established in the Programmatic Environmental Evaluation.*



USAID was legally responsible for the

enforcement of recommended

actions as well as for continuing the monitoring activities throughout the program. The agency contracted an external monitoring team during the course of the project. The USAID Mission Environmental Office was responsible for the reception, overall review, evaluation and dissemination of the monitoring information. The data was periodically forwarded to the Regional Environmental Officer in Guatemala and the Latin America/Caribbean Bureau Environmental Officer in Washington, D.C. for review.

Tables such as the one below tracked performance to monitor implementation and effectiveness of the mitigation measures (taken from the El Salvador Earthquake Reconstruction PEA):

Table 1: Sample Impact, Mitigation and Performance Monitoring Table<sup>1</sup>

Adverse Impact	Mitigation Technique	Expected Cost / Impact	Responsibility for Informing/ Training the MSE & Date Completed	Responsibility for Ensuring Mitigation Technique Completed & Date Completed	Outcome of Mitigation Technique (E.g., Money Saved/Adverse Impacts Avoided) & Other Comments

## IV. Relevance to CAFTA-DR

CAFTA-DR (Dominican Republic-Central America Free Trade Agreement) is a Free Trade Agreement (FTA) signed in August 2004 between the United States and the countries of Costa Rica, Dominican Republic, El Salvador, Guatemala, Honduras, and Nicaragua. Implementing legislation for CAFTA-DR passed the U.S. Senate in June 2005 and the House of Representatives in July 2005 and was signed by the President in August 2005. All other signatory countries have also ratified the treaty (except Costa Rica, even though a public vote ratified the treaty in October 2007, the National Assembly still needs to approve it via the passage of several laws).

The Free Trade Agreement (FTA) is intended to strengthen and develop economic relations and encourage trade among the signatory parties through the reduction and elimination of barriers to trade in goods and services and to investment. Within the agreement are environmental provision specified in Chapter 17 that outlines steps to protect, improve and conserve the environment and natural resources, establishing a mechanism for public participation. It is interesting to note that the environmental aspects of the treaty are integral to the body of the text, not an appendix as was the case under the North America Free Trade Agreement (NAFTA). Chapter 17 specifically establishes a framework of norms and principles that promote environmental protection by way of effective application of each country's laws. A secretariat is established to address concerns of civil society. This mechanism permits the public from any partner country to express concerns about infractions of national law in any of the partner countries, thereby dramatically increasing procedural transparency and promoting consistency in administrative and judicial procedures.

The PEA for Earthquake reconstruction predated CAFTA-DR, but together with existing Government of El Salvador environmental regulations, provided an improved baseline for El Salvador's environmental performance standards under Chapter 17 of the FTA. As set forth in Article V of the FTA's Environmental Cooperation Agreement, the countries have identified the need for strengthening environmental management systems, including reinforcing institutional and legal frameworks for the capacity to develop, implement, administer and enforce environmental laws, regulations, standards and policies.

Technical assistance is a large part of the interchange among the signatory FTA countries. Assistance in environmental impact analysis is part of the slate of training sessions offered by U.S. Government agencies to the partner countries.

Under Chapter 17 of the FTA, any partner country citizen can file a complaint about an infraction in any other member country. Therefore, it is more important than ever to have good solid process with public participation.

## V. Sustainability

A significant benefit of the reconstruction project was improved sustainability through increased institutional capacity. The Salvadoran government installed a geographic information system as a decision making and environmental screening tool for the reconstruction as it worked with USAID. The system is still in use. The nationwide process for handling and disposal of medical waste was also implemented, complementing the infrastructure required in the new medical clinic construction.

## VI. RESULTS

### A. HOUSING

The housing component had an approved total budget of \$104 million. Project implementation utilized NGOs (Care, CHF, CRS, and Samaritan's purse, Save the Children, World Vision, Mercy Corps and Salvation Army) as well as FONAVIPO (the government national housing fund) for a total of 26,872 houses.

Most normal environmental impacts were avoided through the GIS filtering process to avoid floodplains, landslide prone areas and steep slopes. Mitigation measures that were applied to a relatively small percentage of the projects included efforts such as surface runoff conveyance and soil retention structures. A subset of these sites requiring mitigation measures were monitored by the U.S. Army Corps of Engineers under an agreement with USAID.



*Mitigation measures at housing sites included rock walls for soil retention (right) and hardened water outfalls to reduce erosion (left).*

### B. SCHOOLS

The school component included reconstruction of up to 40 buildings with a budget of \$8.4 million. This reconstruction effort was carried out through the GOES Social Investment Fund for Local Development (FISDL).

Six of the schools required more monitoring work due to different construction problems, including provision of water, resolving solid waste management issues and the conservation of green spaces around the area of the schools.



*School construction required the retention of trees in this highly deforested country.*

### **C. HEALTH FACILITY RECONSTRUCTION**

There was an approved budget of \$4.3 million for the construction of six clinics. During construction, the main environmental concerns were the disposal of the medical waste and the conservation of trees around the construction sites. Buildings were resituated whenever possible to retain the trees in this already deforested country. A depository for medical waste was included in the design of each clinic to address both environmental and health concerns. Perhaps the most lasting contribution of this component was the incorporation of medical waste management procedures. The procedures, based on the World Health Organization norms, prescribe the handling and disposal of infectious medical waste and are now used not only in the clinics of this project, but also in other facilities throughout the country.



*Proper medical waste handling and disposal is now observed in all the clinics.*

## D. RECONSTRUCTION OF LOCAL MARKETS

Three major city markets were constructed for a total of \$3.1 million. They serve a population of at least 120,000 and benefit at least 1,680 vendors. This component served a major role in stimulating local economies.



Mitigation measures included the stipulation that any archaeological evidence found during excavation had to be reported to the appropriate authorities.

*San Vicente Market,  
San Vicente*

## E. RECONSTRUCTION OF MUNICIPAL BUILDINGS

Approximately \$4 million was invested in the reconstruction of 19 municipal buildings. As required in the PEA for every project, each site was visited, reviewed and approved based on the Environmental Checklists designed for this component. Providing the infrastructure to enable local government to function again was vital to recovery.



*Santiago de Maria town hall, Usulután, was  
completely destroyed by the first earthquake*



*San Francisco Javier municipal  
building, Usulután*

## VII. CONCLUSIONS

Given the enormous scale of the reconstruction effort, the programmatic environmental assessment approach was appropriate. The melding of the U.S. and Salvadoran environmental processes into one procedure was also an effective approach, sometimes perhaps compensating for procedural weaknesses for the sake of expediency.

As is often the case after natural disasters, the silver lining lies in the opportunity to build back better. This opportunity was captured not only on the infrastructure level (for example medical clinics designed with medical waste facilities and solid waste depositories included at the schools) but also on a procedural level. The institutionalization of GIS use within MARN to wisely select project sites with minimal risk to future geologic failure was perhaps the best mitigation of all, namely good planning.

The aggregation of like construction projects such as houses, schools, markets and medial clinics was another logical decision that allowed for the prescription of thematically specific mitigation measures while remaining at the programmatic level.

As per the intent of 22 CFR 216, environmental considerations were built into the project design and execution. Environmental compliance and monitoring goes hand in hand with sound construction. USAID had a full time person assigned to assure that the environmental components were followed. An interagency agreement between USAID and the U.S. Army Corps of Engineers also included an integral monitoring and ground-truthing component into the reconstruction effort. The review time of the Bureau Environmental Officer in Washington as well as the Regional Environmental Advisor (author) also largely defined the work load during planning and implementation, respectively. The commitment of funds and human capital were necessary to foster success in this massive reconstruction project, but a relatively small percentage of the project costs. Nevertheless the investment in environmental protection is an investment in sustainability. It is a good development practice and wise politics.

The design of the environmental guides was quite effective. Given the breadth of the activities, they were reduced to like-categories with similar activities, potential impacts and likely mitigation measures. This approach allowed for identifying higher risk project sites and therefore a credible sub-sampling approach for the author to review the applied mitigation measures.

The use of GIS was fundamental in screening the potential sites for selection. The project opportunities were abundant, so this tool allowed USAID to be selective in determining which reconstruction sites were geographically in the lowest risk areas and therefore had the greatest likelihood of success, not to mention lower death tolls in future events. This is perhaps a lesson that could have been applied in the Hurricane Katrina reconstruction in the United States. The competitive nature of the project site submissions also reduced the US Government manpower needed in identifying and proposing construction sites. The non-governmental organizations did all the preparatory work per the USAID terms of reference.

The reconstruction process also lent a hand toward integrating technological capacity within the Salvadoran Government by introducing this GIS application for land management for future applications.

The homogenization of the US Government and Salvadoran approaches and guidelines was not seamless, but was required to meet the environmental laws of both countries. The approach was to take the more comprehensive U.S. requirements and then create a document that was all-encompassing, addressing the overlap and gaps for a unified approach.

Several issues became clear during the process. It was imperative to have expert technical assistance available as well as training on the use of the environmental guidelines. Responsibility for compliance monitoring of the regulations and of the mitigation measures also had to be made clear at the beginning of the process. It was also imperative to ensure a sufficient budget for environmental studies, mitigation work and follow up of the mitigation work. The weak points of the process included the lack of alternative development and perhaps the low level of public participation. In such widespread disasters in countries where government services aren't always available, most of the population is simply happy to have accomplishments.

While the free trade agreement was just an incipient idea at the time of reconstruction, the reconstruction process in many ways set the stage for compliance with the environmental chapter of CAFTA-DR by providing an improved baseline for El Salvador's environmental performance standards. Besides trade and political interests, the obligation of being a good international neighbor was also hopefully a strong driving factor for the prompt and generous assistance from the United States to El Salvador. Hopefully the procedural benefits set by this precedent of incorporating environmental considerations will long outlive even the structural accomplishments of national reconstruction.

## **List of Acronyms**

(in order of appearance)

USAID	United States Agency for International Development
NEPA	(U.S.) National Environmental Policy Act
CFR	(U.S.) Code of Federal Regulations
CAFTA-DR	Dominican Republic-Central America Free Trade Agreement
NAFTA	North American Free Trade Agreement
IDB	Inter-American Development Bank
CABEI	Central American Economic Integration Bank
NGO	Non-Governmental Organization
ETD	Environmental Threshold Decision
PEA	Programmatic Environmental Assessment
ARD	Associates in Rural Development (consulting firm)
GOES	Government of El Salvador
MARN	(El Salvador) Ministry of Natural Resources and Environment)
EIA	Environmental Impact Assessment
TOR	Terms of Reference
EA	Environmental Assessment
ERP	Earthquake Reconstruction Project
FTA	Free Trade Agreement
CHF	Cooperative Housing Foundation
CRS	Catholic Relief Services
FONAVIPO	(Salvadoran) National Housing Fund
FISDL	(Salvadoran) Social Investment Fund for Local Development

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<sup>1</sup>ARD. Programmatic Environmental Assessment for Earthquake Reconstruction, August 2001.

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