

Initial Environmental Examination

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BAN: Second City Region Development Project – Narayanganj Roads

Package No. CRDP-II/LGED/Narayanganj/Araihazar/NCB/2018/W-01

CURRENCY EQUIVALENTS

(as of 21 February 2019)

Currency Unit = taka (Tk)

Tk1.00 = \$0.0119

\$1.00 = Tk83.89

ABBREVIATION

ADB	-	Asian Development Bank
BOQ	-	Bill of Quantities
CRDP	-	City Region Development Project
DOE	-	Department of Environment
EARF	-	environmental assessment and review framework
ECC	-	Environmental Clearance Certificate
ECR	-	Environmental Conservation Rules
EIA	-	environmental impact assessment
EMP	-	environmental management plan
GRC	-	grievance redress committee
GRM	-	grievance redress mechanism
IEE	-	initial environmental examination
LGED	-	Local Government Engineering Department
PDSC	-	preparation, design and supervision consultant
NGO	-	nongovernment organization
NOC	-	no objection certificate
O&M	-	operations and maintenance
PIU	-	project implementation unit
PMCU	-	project management and coordination unit
REA	-	rapid environmental assessment
ROW	-	right-of-way
SPS	-	Safeguard Policy Statement
WBM	-	water bound mecadam

NOTE

In this report, "\$" refers to United States dollar.

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CONTENTS

	Page
EXECUTIVE SUMMARY	
I. INTRODUCTION	1
A. Background	1
B. Purpose of the Initial Environmental Examination	2
C. Extent of the Study	3
D. Methodology	3
II. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK	3
A. ADB Safeguard Policy Statement	3
B. National Environmental Impact Assessment Law	6
C. Application for Environmental Clearance	8
D. Applicable Environmental Standards	9
E. Other Relevant National Laws	11
F. International Environmental Agreements	12
III. DESCRIPTION OF THE SUBPROJECT	13
A. Subproject Scope and Components	13
B. Existing Condition of Subproject Components	14
C. Proposed Interventions or Development	19
IV. DESCRIPTION OF THE ENVIRONMENT	46
A. Physical Resources	46
B. Ecological Resources	47
V. ASSESSMENT OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES	54
A. Compliance with Subproject Selection Criteria	54
B. Anticipated Impacts and Mitigation Measures - Planning, Location and Design Phase	55
C. Anticipated Impacts and Mitigation Measures - Construction Phase	58
D. Anticipated Impacts and Mitigation Measures – Operation and Maintenance Phase	65
VI. CONSULTATION, INFORMATION DISCLOSURE, AND GRIEVANCE REDRESS MECHANISM	65
A. Consultation	65
B. Information Disclosure	66
C. Grievance Redress Mechanism	67
VII. ENVIRONMENTAL MANAGEMENT PLAN	69
A. Institutional Arrangements	69
B. Environmental Management Plan	72
C. Environmental Monitoring Program	88
D. Capacity Development Training	91
E. Environmental Management and Monitoring Plan Implementation Cost (Indicative)	92
VIII. MONITORING AND REPORTING	94
IX. CONCLUSION AND RECOMMENDATIONS	95

APPENDIXES

1. Rapid Environmental Assessment Checklist
2. Template for Application for Environmental Clearance Certificate from Bangladesh Department of Environment
3. Strip Maps of Subproject Alignments
4. Sample Spoil Management Plan
5. Local Government Engineering Division Tree Plantation Program Manual
6. Strip Maps Showing PCRs (Religious Establishments) along the Road Alignments
7. Public Consultation
8. Sample Grievance Registration Form
9. Suggested Template for Record-Keeping of Grievances
10. Indicative Terms of Reference for Safeguards Specialist for Project Management Coordination Unit, Project Implementation Units and Preparation, Design and Supervision Consultant
11. Traffic Management Plan Template
12. Sample Daily Monitoring Sheet for Contractors
13. Sample Inspection Report for Project Management Coordination Unit and Project Implementation Units
14. Semi-Annual Environmental Monitoring Template

EXECUTIVE SUMMARY

The Second City Region Development Project (the project) will support development in the city regions of Dhaka and Khulna by building upon infrastructure and capacity building initiatives implemented during the first City Region Development Project (CRDP) funded by the Asian Development Bank (ADB). The project will finance additional crucial infrastructure in urban and peri-urban areas needed to stimulate growth and improve livability Dhaka and Khulna, two densely populated rapidly growing city regions of Bangladesh. The project will also continue strengthening capacity for project development, sustainable service delivery, and community awareness. The project will be implemented over a 5-year period.

Subproject Scope. This initial environmental examination (IEE) report has been prepared for one of the subprojects of the project that is covered by package number CRDP-II/LGED/Narayanganj/Araihazar/NCB/2018/W-01. This package includes combination of construction and rehabilitation of the following road alignments or components in the Araihazar Upazila in Dhaka city region: (i) Road 1: Binaichar – Kamrangir Char (Road ID 4082); (ii) Road 2: Fakirbari - Kamrangir Char Majerchargopindir School (Road ID 4083); (iii) Road 3: Bagbari – Naogaon (Road ID 4080); and (iv) Road 4: Mukundi – Araihazar (Road ID 4004).

Categorization. ADB requires the consideration of environmental issues in all aspects of ADB's operations, and the requirements for environmental assessment are described in ADB Safeguard Policy Statement (SPS), 2009. Using ADB rapid environmental assessment checklist, the subproject is classified as Environmental Category B per ADB SPS, 2009 as no diverse, irreversible or unprecedented significant impacts are envisaged. ADB's Environment and Safeguards Division confirmed this categorization on 27 August 2018. Accordingly, this IEE has been undertaken, which assesses in more detail the likely environmental impacts of the subproject and provides an environmental management plan (EMP) specifying the required mitigation and monitoring measures to ensure that these impacts are managed to acceptable levels. This IEE also emphasizes the need to incorporate pollution prevention and control technologies during the design, construction, and operation of the subproject and adhere to internationally recognized standards such as the World Bank Group's Environment, Health and Safety (EHS) Guidelines.

Environmental Management. The potential impacts and mitigation measures have been identified through review of the subproject designs, discussion with the designers, and stakeholder consultation. An EMP is included as part of this IEE, which discusses the following:

- (i) mitigation measures for environmental impacts during implementation; and
- (ii) an environmental monitoring program, and the responsible entities for mitigating, monitoring, and reporting.

The total length of the four subproject roads is 13.556 kilometers (km). The subproject road alignments pass more or less through built-up areas of small and medium enterprises, markets or bazars, agricultural or open fields, sporadically scattered rural human settlements and various ponds, ditches and low-lying areas on both sides; and traverse along and/or cross some canals. These subproject roads are expected to establish more efficient connectivity within the Dhaka city region.

The subproject road alignments are not within or located near any ecologically critical areas, and further development interventions to these roads will not have any significant impact on the physical, biological and social environment. This IEE has been conducted to evaluate any potential

environmental impacts of the subproject and propose measures to mitigate these impacts, including monitoring.

The subproject does not involve any special considerations regarding location since the roads occupy existing rights-of-way (ROWs). There will be no road widening beyond these ROWs, and therefore no land acquisition is required. No private property will be affected and the methods to be used for site preparation, construction and commissioning, as well as associated arrangements to ensure sound environmental management and safety at all times, are to be defined by the Contractor in a site-specific environmental management plan (SEMP) based on the EMP of this IEE. Contractor will submit its SEMP for approval to the project implementation unit (PIU). This will cover the following areas of impact which are potentially significant but can be mitigated by the adoption of good practice: (i) impedance of traffic, (ii) noise pollution and vibration, (iii) waste generation (iv) release of silt from excavations, (v) water pollution, (vi) air and dust pollution, (vii) community health and safety risks, and (viii) occupational health and safety.

Grievance Redress Mechanism. The project will adopt the grievance redress mechanism (GRM) outline of the first CRDP. The GRM shall be set up to register grievances of the people regarding technical, social and environmental aspects. The process will be designed to be transparent, gender responsive, culturally appropriate and commensurate to the risks and adverse impacts of the project, as well as readily accessible to all segments of the affected people. The project GRM will not supersede any legal government grievance procedures. Affected people are to be informed about the mechanism through media and public outlets. This participatory process shall ensure that all views of the people are adequately reviewed and suitably incorporated in the design and implementation process.

Implementation Arrangement. The executing and implementing agency is the Local Government and Engineering Department (LGED) of the Government of Bangladesh. The LGED will establish a project management and coordination unit (PMCU) comprising officials including an Environmental Safeguard Officer who is a permanent employee of LGED. The PMCU will be strengthened with external experts or consultants in environmental and social safeguards, including experts on finance, procurement, technical areas, and contract management. PIUs will be established at the upazila or local level where the project subprojects are located. In this subproject, Araihasar Upazila will serve as the PIU. The PMCU and Araihasar PIU will have responsibility for overseeing subproject management, including overseeing EMP implementation.

For civil works, the contractor will be required to (i) obtain all statutory clearances prior to commencement of civil works; (ii) establish an operational system for managing environmental impacts; (iii) prepare a SEMP based on the EMP of this IEE, and submit to PIU for approval; (iv) carry out all of the monitoring and mitigation measures set forth in the approved SEMP; and (v) implement any corrective or preventative actions set out in safeguards monitoring reports that the PMCU will prepare from time to time to monitor implementation of this IEE, EMP, and SEMP. The contractor shall allocate a budget for compliance with these EMP measures, requirements and actions.

Monitoring and Reporting. The EMP compliance monitoring will be undertaken by the PMCU and PIU, with support of external experts or consultants. Contractors will submit monthly reports to PIU, while PIU submits quarterly reports to the PMCU. Consistent with reporting requirements set out in the Project Administration Manual, PMCU will prepare and submit reports to ADB on a semi-annual basis. The submission of semi-annual environmental monitoring reports to ADB will continue until ADB issues a project completion report for the project.

Conclusion. The overall finding of this IEE is that the subproject will result in significant environmental benefits because the current conditions of roads will be improved and will be much better for local residents. Severe traffic congestion will be lessened and thereby reducing vehicle noise (honking of horns) and air pollution (idling vehicles) in the subproject areas. Ultimately, the subproject will result in significant economic benefit because the road network could cater to more inclusive and environmentally sustainable economic growth in the Dhaka city region. The subproject will not have diverse, irreversible or unprecedented adverse environmental impacts and the potential significant impacts identified are associated with the construction phase, which can be managed through effective implementation of the EMP. No further environmental assessment is therefore required and the classification of Category B per ADB SPS, 2009 is confirmed.

This IEE has been prepared based on preliminary designs of the subproject. The PMCU shall update this draft IEE based on final detailed design and submit to ADB for review and disclosure. The approved updated IEE shall be treated as the final IEE and shall be attached in the bid and contract documents. No works can commence until (i) the final IEE approved by ADB is provided to the contractor; and (ii) the SEMP prepared by the contractor is approved by Araihasar PIU. If circumstances would require, the IEE will be further updated for ADB's review during the implementation period. In the event of unanticipated impact or any design change and/or non-compliance during subproject implementation period, the IEE shall be updated to include (i) assessment of the unanticipated impact and corresponding mitigation measures; or (ii) information on the design change and assessment of associated environmental impacts, if any; and/or (iii) corrective actions, associated cost and schedule; respectively.

I. INTRODUCTION

A. Background

1. The Second City Region Development Project (the project) will support development in the city regions of Dhaka and Khulna by building upon infrastructure and capacity building initiatives implemented during the first City Region Development Project (CRDP)¹ funded by the Asian Development Bank (ADB). The project will finance additional crucial infrastructure in urban and peri-urban areas needed to stimulate growth and improve livability in Dhaka and Khulna, two densely populated rapidly growing city regions of Bangladesh. The project will also continue strengthening capacity for project development, sustainable service delivery, and community awareness. The project will be implemented over a 5-year period. Specifically, the project will support the (i) construction, upgrade and rehabilitation of selected Dhaka city region roads, bridges and culverts, including drainage; (ii) construction, upgrade and rehabilitation of drainage in Khulna city region; and (iii) development of a Khulna city corporation comprehensive solid waste management plan and small works.

2. The project will be implemented over a 5-year period. The indicative list of subprojects is summarized in the environmental assessment and review framework drafted for the project. The subprojects are largely built around ‘integrated area planning’ which seeks to enhance economic activity in the city regions and provides opportunities for investment, including (i) transport infrastructure upgrading; and (ii) solid waste management.

3. The project has been classified as environmental category B per ADB Safeguard Policy Statement (SPS), 2009.² Project preparation was supported by (i) a project preparatory technical assistance (TA);³ and (ii) a project design advance loan of \$5 million to finance preparation, design and supervision consultancy services. Part of the preparatory work was the preparation of the environmental assessment and review framework (EARF) and initial environmental examination (IEE) reports in accordance with the requirements of ADB SPS, 2009. Further support was provided by ADB in preparing the EARF and IEE reports for sample subprojects to meet the requirements for projects proposed under a sector loan modality.

4. This IEE report has been prepared for the subproject covered by package number CRDP-II/LGED/Narayanganj/Araihaazar/NCB/2018/W-01, which includes combination of construction and rehabilitation of the following road alignments or components in the Araihaazar Upazila in Dhaka city region: (i) Road 1: Binaichar – Kamrangir Char (Road ID 4082); (ii) Road 2: Fakirbari

¹ ADB. 2010. [People's Republic of Bangladesh: City Region Development Project](#). Manila.

² ADB's Environment and Safeguards Division confirmed the Category B classification of the project on 27 August 2018. A project's category is determined by the category of its most environmentally sensitive component, including direct, indirect, cumulative, and induced impacts in the project's area of influence. Each proposed project is scrutinized as to its type, location, scale, and sensitivity and the magnitude of its potential environmental impacts. Projects are assigned to one of the following four categories: (i) **Category A**. A proposed project is classified as category A if it is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An environmental impact assessment is required. (ii) **Category B**. A proposed project is classified as category B if its potential adverse environmental impacts are less adverse than those of category A projects. These impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects. An initial environmental examination is required. (iii) **Category C**. A proposed project is classified as category C if it is likely to have minimal or no adverse environmental impacts. No environmental assessment is required although environmental implications need to be reviewed. (iv) **Category FI**. A proposed project is classified as category FI if it involves investment of ADB funds to or through a financial intermediary. ADB Environment and Safeguards Division confirmed this categorization on 27 August 2018.

³ ADB. [People's Republic of Bangladesh: City Region Development Project II](#).

- Kamrangir Char Majerchargopindir School (Road ID 4083); (iii) Road 3: Bagbari – Naogaon (Road ID 4080); and (iv) Road 4: Mukundi – Araihaazar (Road ID 4004).

B. Purpose of the Initial Environmental Examination

5. The purpose of this IEE is to describe the assessment of environmental impacts due to the proposed subproject based on the detailed design produced under the project, and to specify measures to address impacts. This IEE is based on engineering design information, a field visit, and secondary data to characterize the environment. It contains the results of interviews and consultations with stakeholders. This IEE includes an environmental management plan (EMP) outlining mitigation measures and monitoring requirements, and environmental specifications to be appended to contract documents.

6. Screening using ADB's rapid environmental assessment checklist for road (Appendix 1) was initially conducted, and results of the rapid assessment show that the project is unlikely to cause any diverse, irreversible or unprecedented significant impacts, and therefore classified under Category B per ADB SPS, 2009. ADB's Environment and Safeguards Division confirmed this categorization on 27 August 2018. Thus, this IEE has been prepared in accordance with ADB SPS, 2009 requirements for environment category B projects. The location of the subproject is shown in Figure 1.

Figure 1: Location Map of Subproject (Yellow Lines)



Source: Google Earth.

C. Extent of the Study

7. This IEE has been carried out based on most up-to-date subproject details and designs provided by the design team during the preparation of this report. Minor changes may occur in the structural component of the subprojects at the detailed designing stage. The scope of the IEE study has been confined to project related activities associated with design, construction (e.g., site clearing, earth borrowing, quarrying, material transportation, paving, camping) and operation stages.

D. Methodology

8. This IEE has been carried out using reconnaissance survey, field visits, consultation with stakeholders and others, Non-Government Organizations (NGOs), review of existing data, assessment to identify adverse impacts and preparation of EMP and monitoring program at all stages of subproject implementation. Physical assessments were made for entire corridors with respect to terrestrial and aquatic resources, including physical cultural resources and other natural and man-made structures.

II. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

9. ADB will not finance any project if it does not comply with ADB SPS, 2009 nor will it finance any project if it does not comply with its host country's environmental and social safeguard laws. Where discrepancy between ADB and government policies exist, the stricter policy will prevail. Moreover, ADB SPS, 2009 applies to all ADB-financed and/or ADB-administered sovereign projects, and their components regardless of the source of financing, including investment projects funded by a loan; and/or a grant; and/or other means.

A. ADB Safeguard Policy Statement

10. ADB SPS, 2009 requires borrowers to meet a set of requirements (Safeguards Requirements 1) when delivering environmental safeguards for projects supported by ADB. The objectives are to ensure the environmental soundness and sustainability of projects, and to support the integration of environmental considerations into the project decision-making process. Hence, the project is required to comply with these requirements. Summary of the step by step process is discussed below in this section. Detailed discussions are provided in the ADB SPS, 2009.⁴

11. **Screening and Categorization.** Subprojects are to be screened for their expected environmental impacts and are assigned to a specific category (footnote 2). Categorization is to be based on the most environmental sensitive component. However, for subproject(s) with component(s) that can trigger Category A or with potentially significant adverse impacts that are diverse, irreversible, or unprecedented, project management and coordination unit (PMCU) shall examine alternatives to the subproject's location, design, technology, and components that would avoid, and, if avoidance is not possible, minimize adverse environmental impacts and risks, and to meet Category B categorization. The rationale for selecting the subproject location, design, technology, and components will be properly documented, including, cost-benefit analysis, taking environmental costs and benefits of the various alternatives considered into account. The "no action" alternative will be also considered. In general, criteria that can trigger subproject's 'Category A' are discussed in Section II of the EARF.

⁴ ADB. 2009. [Safeguard Policy Statement](#). Manila.

12. **Environmental Assessment.** Environmental assessment shall include description of environmental and social baseline to provide an understanding of current conditions forming the benchmark against which subproject impacts are assessed. Environmental impacts and risks will be analyzed for all relevant stages of the project cycle, including design and planning stage, construction, operations, decommissioning, and post-closure activities such as rehabilitation or restoration. This IEE may be used as model document for other future roads subprojects.

13. **Environmental Planning and Management.** The PMCU shall prepare environmental management plan (EMP) to be included in the IEE report. The EMP shall describe and address the potential impacts and risks identified by the environmental assessment. The level of detail and complexity of the EMP and the priority of the identified measures and actions will be commensurate with the subproject's impact and risks. The EMP shall include the proposed mitigation measures, environmental monitoring and reporting requirements, emergency response procedures, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators.

14. **Public Disclosure.** The Local Government Engineering Department (LGED), through PMCU, shall submit to ADB for disclosure on ADB website so affected people, other stakeholders, and the public can provide meaningful inputs into the subproject design and implementation:⁵

- (i) final IEE upon receipt;
- (ii) a new or updated IEE and corrective action plan prepared during subproject implementation, if any; and
- (iii) environmental monitoring reports submitted during subproject implementation upon receipt.

15. **Consultation and Participation.** The PMCU and Araihaazar PIU shall carry out meaningful consultation⁶ with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation. The consultation process and its results are to be documented and reflected in the environmental assessment report.

16. **Grievance Redress Mechanism.** The LGED, through PMCU, shall establish a mechanism to receive and facilitate resolution of affected peoples' concerns, complaints, and grievances about the subproject's environmental performance. The grievance mechanism shall be scaled to the risks and adverse impacts of the subproject. As of the ADB loan processing for the project, a grievance redress mechanism (GRM) has been established and discussed in detail in Section VI below.

17. **Monitoring and Reporting.** The PMCU shall monitor, measure and document the progress of implementation of the EMP. If necessary, PMCU will identify the necessary corrective actions, and reflect them in a corrective action plan. PMCU will prepare and submit to ADB semi-

⁵ Per ADB SPS, 2009, prior to disclosure on ADB website, ADB reviews the "borrower's/client's social and environmental assessment and plans to ensure that safeguard measures are in place to avoid, wherever possible, and minimize, mitigate, and compensate for adverse social and environmental impacts in compliance with ADB's safeguard policy principles and Safeguard Requirements 1-4."

⁶ Per ADB SPS, 2009, meaningful consultation means a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

annual environmental monitoring reports that describe progress with implementation of the EMP and compliance issues and corrective actions, if any. For subprojects likely to have significant adverse environmental impacts during operation, reporting will continue until ADB issues a project completion report.

18. **Unanticipated Environmental Impacts.** Where unanticipated environmental impacts become apparent during subproject implementation, PMCU shall update the environmental assessment and EMP or prepare a new environmental assessment and EMP to assess the potential impacts, evaluate the alternatives, and outline mitigation measures and resources to address those impacts.

19. **Pollution Prevention and Control Technologies.** During the design, construction, and operation of the subproject the PMCU and Araihasar PIU shall apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines. These standards contain performance levels and measures that are normally acceptable and applicable to subprojects. When the government regulations differ from these levels and measures, the subproject shall achieve whichever is more stringent. If less stringent levels or measures are appropriate in view of specific subproject circumstances, LGED through PMCU will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS, 2009.

20. **Occupational Health and Safety.** PMCU⁷ shall ensure that workers⁸ are provided with a safe and healthy working environment, considering risks inherent to the sector and specific classes of hazards in the subproject work areas, including physical, chemical, biological, and radiological hazards. PMCU shall ensure to take steps to prevent accidents, injury, and disease arising from, associated with, or occurring during the course of work by (i) identifying and minimizing, so far as reasonably practicable, the causes of potential hazards to workers; (ii) providing preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (iii) providing appropriate equipment to minimize risks and requiring and enforcing its use; (iv) training workers and providing them with appropriate incentives to use and comply with health and safety procedures and protective equipment; (v) documenting and reporting occupational accidents, diseases, and incidents; and (vi) having emergency prevention, preparedness, and response arrangements in place.

21. PMCU shall ensure to apply preventive and protective measures consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines.⁹

22. **Community Health and Safety.** The PMCU shall ensure to identify and assess the risks to, and potential impacts on, the safety of affected communities during the design, construction, operation, and decommissioning of the subproject, and will establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts. This includes specific community road safety especially for children and elderly persons.

⁷ In case where responsibility is delegated to subproject contractors during construction phase, project management and coordination unit (PMCU) shall ensure that the responsibilities on occupational health and safety as described herein are included in the contract documents.

⁸ Including nonemployee workers engaged by Local Government Engineering Department (LGED) through contractors or other intermediaries to work on project sites or perform work directly related to the project's core functions.

⁹ World Bank Group, 2007. *Environmental, Health, and Safety General Guidelines*. Washington, DC.

23. **Physical Cultural Resources.** The PMCU is responsible for siting and designing the subproject to avoid significant damage to physical cultural resources. Such resources likely to be affected by the subproject will be identified, and qualified and experienced experts will assess the subproject's potential impacts on these resources using field-based surveys as an integral part of the environmental assessment process. When the proposed location of a subproject component is in areas where physical cultural resources are expected to be found as determined during the environmental assessment process, chance finds procedures shall be included in the EMP.

24. **Environmental Audit.** When the subproject involves existing activities or facilities, PMCU is responsible to ensure that relevant external experts will perform environmental audits to determine the existence of any areas where the subproject may cause or is causing environmental risks or impacts. If the subproject does not foresee any new major expansion, the audit constitutes the environmental assessment for the subproject.

25. **Bidding and Contract Documents.** IEE, which contain the EMP, shall be included in bidding and contract documents and verified by Araihasar PIU. The PMCU and Araihasar PIU shall also ensure that bidding and contract documents include specific provisions requiring contractors to (i) comply with all other conditions required by ADB;¹⁰ and (ii) to submit to Araihasar PIU, for review and approval, a site-specific environmental management plan (SEMP), including (i) proposed sites/locations for construction work camps, storage areas, hauling roads, lay down areas, disposal areas for solid and hazardous wastes; (ii) specific mitigation measures following the approved EMP; (iii) monitoring program as per EMP; and (iv) budget for SEMP implementation, among others as may be required. No works can commence prior to approval of SEMP. A copy of the EMP and/or approved SEMP will be kept on site during the construction period at all times. Non-compliance with, or any deviation from, the conditions set out in the EMP and/or SEMP constitutes a failure in compliance and shall require corrective actions.

26. **Conditions for Award of Contract and Commencement of Work.** PMCU shall not award any works contract under the subproject until (i) relevant provisions from the EMP are incorporated into the works contract; (ii) this IEE is updated to reflect subproject's detailed design and PMCU has obtained ADB's clearance of such updated IEE; and (iii) IEE (i.e., IEE in compliance with Environmental Conservation Rules [ECR], 1997) approved by the Department of Environment (DOE) and other necessary permits from relevant government agencies have been obtained. For "design, build, and operate" type contracts, PMCU shall ensure no works for a subproject which involves environmental impacts shall commence until (i) relevant provisions from the EMP are incorporated into the works contract; and (ii) this IEE is updated to reflect subproject's detailed design and PMCU has obtained ADB's clearance for such updated IEE.

B. National Environmental Impact Assessment Law

27. **Environmental Conservation Act (ECA), 1995.** Provides for the conservation of environment, improvement of environmental standards and control and mitigation of environmental pollution. In line with these provisions of the Act, the Environmental Conservation Rules, 1997 have been framed. This act provides for (i) remedial measures for injury to ecosystem; (ii) provides for any affected person due to environmental pollution to apply to DOE for remediation of the damage; (iii) discharge of excessive environmental pollutants;

¹⁰ Contractors to comply with (i) all applicable labor laws and core labor standards on (a) prohibition of child labor as defined in national legislation for construction and maintenance activities; (b) equal pay for equal work of equal value regardless of gender, ethnicity, or caste; and (c) elimination of forced labor; and with (ii) the requirement to disseminate information on sexually transmitted diseases, including HIV/AIDS, to employees and local communities surrounding the project sites.

(iv) inspection of any activity for testing any equipment or plant for compliance to the environment act, including power to take samples for compliance; (v) power to make rules and standards with reference to environment; and (vi) penalty for non-conformance to environment act under the various sections.

28. **Environmental Conservation Rules, 1997.** The Rules outline the processes and requirements of environmental clearances for specific type of projects indicated therein and stipulates that “no industrial unit or project shall be established or undertaken without obtaining, in the manner prescribed by rules, an Environmental Clearance Certificate (ECC) from the Director General” of the DOE. Schedule 1 of the Rules classifies industrial units and projects into four categories according to their site and impact on the environment, namely (i) green, (ii) orange-A, (iii) orange-B, and (iv) red. The rules specify the procedures for issuing ECC for the various categories of projects. Table 1 summarizes the requirements for environmental clearance application for each category.

Table 1: Summary Environmental Clearance Application Requirements Per Category^a

Category	Requirements
Green	(i) Completed Application for Environmental Clearance Certificate (ECC); (ii) Payment of the appropriate fee based on Schedule 3 of Environmental Conservation Rules (ECR), 1997; (iii) General information about the project; (iv) Exact description of the raw materials to be used and the product to be manufactured (where relevant); and (v) No objection certificate from the local authority.
Orange-A	(i) Completed Application for ECC; (ii) Payment of the appropriate fee based on Schedule 3 of ECR, 1997; (iii) General information about the project; (iv) Exact description of the raw materials to be used and the product to be manufactured (where relevant); (v) No objection certificate from the local authority; (vi) Prior issued location clearance certificate (LCC) from Department of Environment (DOE); (vii) Process flow diagram; (viii) Layout plan (showing location of effluent treatment plant (ETP)); (ix) Effluent discharge arrangement; and (x) Outlines of the plan for relocation and rehabilitation (if applicable).
Orange-B	(i) Completed Application for ECC; (ii) Payment of the appropriate fee based on Schedule 3 of ECR, 1997; (iii) Report on the feasibility of the project (if still being proposed); (iv) Report on the initial environmental examination (IEE) of the project, including process flow diagram, layout plan (showing ETP), design of ETP of the project (if still being proposed); (v) Report on the environmental management plan (EMP); (vi) No objection certificate from the local authority; (vii) Prior issued LCC from DOE; (viii) Emergency plan relating to adverse environmental impact and plan for mitigation of the effect of pollution; (ix) Outline of the relocation and rehabilitation plan (where applicable); and (x) Other necessary information as may be required.
Red	(i) Completed Application for ECC; (ii) Payment of the appropriate fee based on Schedule 3 of ECR, 1997; (iii) Report on the feasibility of the project (if still being proposed); (iv) Report on the IEE of the project and the terms of reference (TOR) for environmental impact assessment of the project; or environmental impact

Category	Requirements
	assessment (EIA) report on the basis of the TOR previously approved by DOE, including process flow diagram, layout plan (showing ETP), design of ETP of the project (if still being proposed); (v) Report on the EMP; (vi) No objection certificate from the local authority; (vii) Prior issued LCC from DOE; (viii) Emergency plan relating to adverse environmental impact and plan for mitigation of the effect of pollution; (ix) Outline of the relocation and rehabilitation plan (where applicable); and (x) Other necessary information as may be required.

DOE = Department of Environment, ECC = Environmental Clearance Certificate, ECR = Environmental Conservation Rules, EIA = environmental impact assessment, EMP = environmental management plan, ETP = Effluent Treatment Plant, IEE = initial environmental examination, LCC = location clearance certificate, TOR = term of reference.

^a A Guide to Environmental Clearance Procedure, DOE, Bangladesh Ministry of Environment and Forests, August 2010.

29. Schedule 1 of ECR, 1997 provides the classification for industrial projects and types of development that are common in Bangladesh. Table 2 indicates the subproject's category and its likely classifications based on this schedule.

Table 2: Government of Bangladesh Classification of the Subproject

No.	Subproject	Component	Equivalent in Schedule I of Environmental Conservation Rules	Department of Environment Classification
1.	Roads	Roads	Construction, re-construction and extension of road (feeder road, local road)	Orange – B
		Bridges and culverts	Construction, re-construction and extension of bridge/culvert (length below 100 meters)	Orange – B

C. Application for Environmental Clearance

30. The application and requirement for issuance of ECC are described in the ECR, 1997 and summarized in Table 1. This involves the completion and submission of an application using a form available from the DOE website,¹¹ which is revised from time to time. See Appendix 2 for template being used of this date. The accomplished application form is submitted to DOE together with requirements as enumerated in Table 1. The proponent is also required to pay equivalent application fee prescribed in Schedule 13 of ECR, 1997.

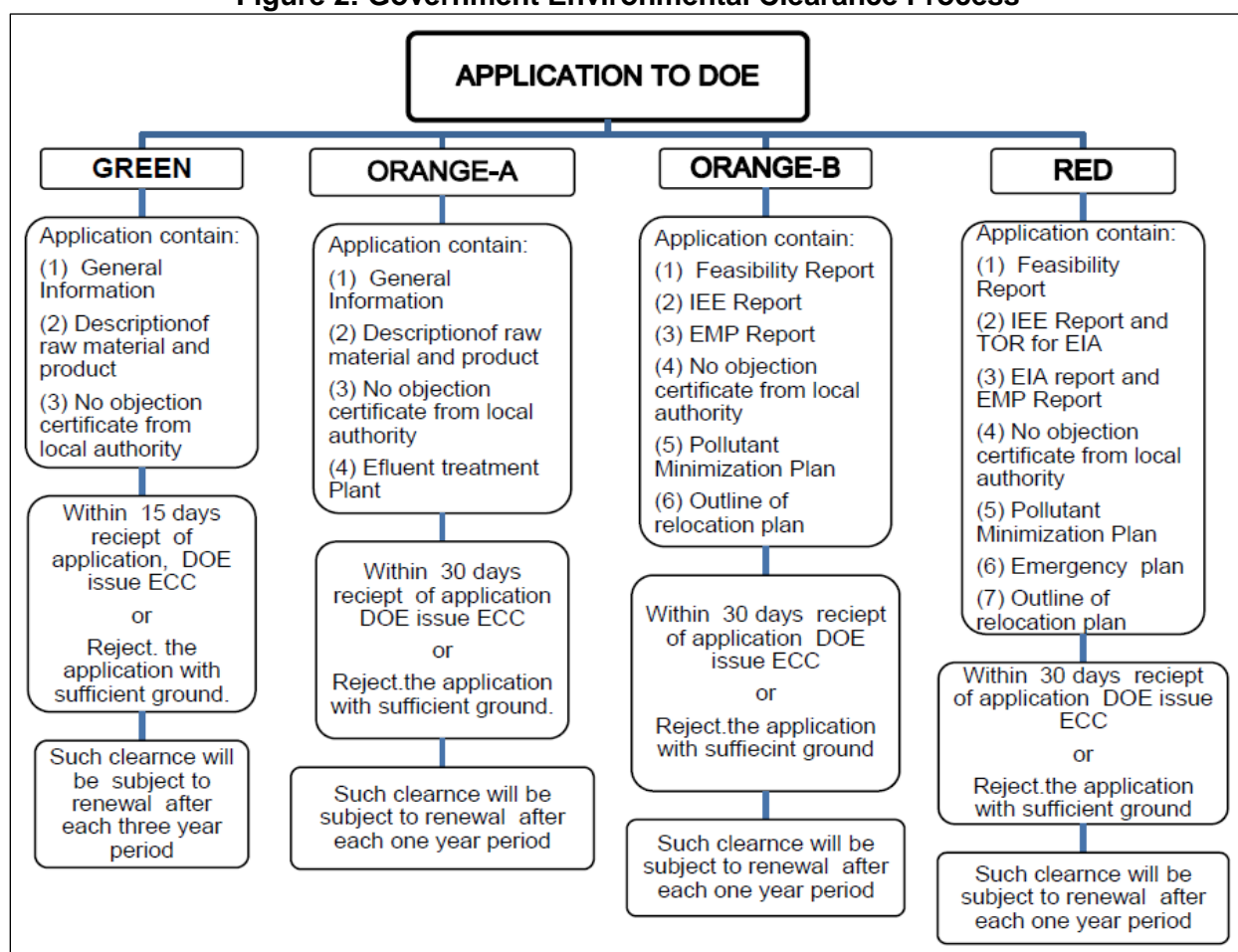
31. The ECC is issued within 30 days from receipt of the application by DOE. Such ECC is required to be renewed every year from the date of its effectivity. For the project, PMCU is responsible for application for ECC. This ECC will cover all subprojects identified under the project. Application for said ECC is ongoing.¹²

32. Figure 2 shows the summary of review process and timelines set under ECR, 1997, leading to the issuance of ECC by DOE.

¹¹ Government of Bangladesh. [Department of Environment](#).

¹² Per information from project management and coordination unit (PMCU), the required fee for Environmental Clearance Certificate (ECC) application and other necessary documents have been submitted to Department of Environment (DOE) as of July 2018. Once approved for Asian Development Bank (ADB) project processing, this initial environmental examination (IEE) will be used in the ECC application with DOE.

Figure 2: Government Environmental Clearance Process



DOE = Department of Environment, ECC = environmental clearance certificate, EIA = environmental impact assessment, EMP = environmental management plan, IEE = initial environmental examination, TOR = terms of reference.

D. Applicable Environmental Standards

33. The ECR, 1997 also provides the environmental standards applicable to the project. Schedule 2 of the ECR presents the national standards for ambient air quality and Schedule 4 of the ECR presents the national standards for ambient noise. Following requirements of ADB SPS, 2009, the subproject shall apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in EHS Guidelines. When the government regulations differ from these levels and measures, the subproject shall achieve whichever is more stringent. If less stringent levels or measures are appropriate in view of specific subproject circumstances, LGED through PMCU will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS, 2009.

34.

35.

36. **Table 3** and

37. Table 4 show the ambient air quality standards and noise level standards to be followed by the subproject.

Table 3: Ambient Air Quality Standards

Parameter	Location	Bangladesh Ambient Air Quality Standard ($\mu\text{g}/\text{m}^3$) ^a	WHO Air Quality Guidelines ($\mu\text{g}/\text{m}^3$)		Applicable to Subproject Per ADB Safeguard Policy Statement ^d ($\mu\text{g}/\text{m}^3$)
			Global Update ^b 2005	Second Edition ^c 2000	
TSP	Industrial and Mixed	500	-	-	500
	Commercial and Mixed	400			400
	Residential and Rural	200			200
	Sensitive	100	-	-	100
PM ₁₀	Industrial and Mixed	-	50 (24-h)	-	50 (24-h)
	Commercial and Mixed	-	50 (24-h)		50 (24-h)
	Residential and Rural	-	50 (24-h)		50 (24-h)
	Sensitive	-	50 (24-h)	-	50 (24-h)
PM _{2.5}	Industrial and Mixed	-	25 (24-h)	-	25 (24-h)
	Commercial and Mixed	-	25 (24-h)		25 (24-h)
	Residential and Rural	-	25 (24-h)		25 (24-h)
	Sensitive	-	25 (24-h)	-	25 (24-h)
SO ₂	Industrial and Mixed	120	20 (24-h)	-	20 (24-h)
	Commercial and Mixed	100	20 (24-h)	-	20 (24-h)
	Residential and Rural	80	20 (24-h)		20 (24-h)
	Sensitive	30	20 (24-h)	-	20 (24-h)
NO ₂	Industrial and Mixed	100	200 (1-h)	-	100
	Commercial and Mixed	100	200 (1-h)	-	100
	Residential and Rural	80	200 (1-h)		80
	Sensitive	30	200 (1-h)	-	30
CO	Industrial and Mixed	5,000	-	10,000 (8-h) 100,000 (15-min)	5,000
	Commercial and Mixed	5,000	-	10,000 (8-h) 100,000 (15-min)	5,000
	Residential and Rural	2,000	-	10,000 (8-h) 100,000 (15-min)	2,000
	Sensitive	1,000	-	10,000 (8-h) 100,000 (15-min)	1,000

ADB = Asian Development Bank, CO = carbon oxide, h = hour, $\mu\text{g}/\text{m}^3$ = microgram per cubic meter, min = minute, NO₂ = nitrogen dioxide, PM_{2.5} = particulate matter 2.5, PM₁₀ = particulate matter 10, SO₂ = sulfur dioxide, TSP = total suspended particle, WHO = World Health Organization.

^a Schedule 2 of ECR, 1997.

^b IFC World Bank Group. 2007. *Environmental, Health and Safety General Guidelines*. Washington, D.C.

^c WHO Regional Office for Europe. 2000. *Air Quality Guidelines for Europe, Second Edition*. Copenhagen.

^d If less stringent levels or measures are appropriate in view of specific project circumstances, PMCU will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS, 2009.

Table 4: Ambient Noise Quality Standards

Receptor/ Source	National Noise Standard Guidelines, 1997 ^a (dB)		WHO Guidelines Value For Noise Levels Measured Out of Doors ^b (One Hour LA ₉ in dBA)		Applicable to Subproject Per ADB Safeguard Policy Statement ^c (dBA)	
	Day	Night	07:00 – 22:00	22:00 – 07:00	Day time	Night time
Industrial area	75	70	70	70	70	70
Commercial area	70	60	70	70	70	60
Mixed Area	60	50	55	45	55	45
Residential Area	50	40	55	45	50	40
Silent Zone	45	35	55	45	45	35

^a Schedule 4 of ECR, 1997.

^b World Health Organization . 1999. Guidelines for Community Noise; World Bank Group. 2007. Environmental, Health and Safety General Guidelines. Washington, D.C.

^c If less stringent levels or measures are appropriate in view of specific project circumstances, PMCU will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS, 2009.

E. Other Relevant National Laws

38. The implementation of subprojects proposed under the project will be governed by government Environmental Acts, Rules, Policies, and Regulations. Table 5 summarizes the applicable national and local laws, regulations, and standards for environmental assessment and management, including applicable international environmental agreements.

Table 5: Summary of Relevant Government Laws, Regulations, and Environmental Standards

Laws, Regulations, and Standards	Details	Relevance to Subproject
Environmental Court Act, 2000	Enacted to establish environment courts and make rules for protection of environmental pollution. Environment Courts are situated at the district level but government may by notification in the official Gazette, establish such courts outside the districts. Environment Courts were given power to directly take into cognizance of any offence relating to environmental pollution. Proceeding of this Court will be similar to criminal courts. One important feature of this Act is that it has been given retrospective effect of any crime committed under environment laws and thus any crime previously committed but is not taken before any court can be taken before the Environment Court or any special Magistrate.	Environmental court has been established in Dhaka where the subproject is located. This court has jurisdiction over any subproject-related environmental cases or litigations or complaints elevated to it.
The <i>Pourashava</i> (Municipality) Ordinance of 1977, the City Corporation Ordinances of 1983 and the recently revised unified	These ordinances have clearly assigned responsibilities to the LGIs to ensure the provision of a wide range of primary and public health services including primary health care, sanitation, water supply, drainage, food and drink, birth and death registration, vector and	The subproject aims to help Arahazar Upazila (as the LGI) achieve or fulfill these mandates.

Laws, Regulations, and Standards	Details	Relevance to Subproject
ordinance for all City Corporations of 14 May 2008 (Local Government Ordinances 16, and 17 of 2008); City Corporation Act 2009, 15 Oct 2009, and; <i>Pourashava</i> Act 2009, 6 Oct 2009.	infectious disease control, etc. for the residents. LGIs have the authority to address all related issues within their legal and administrative mandate.	
National Forestry Policy, 2016	This policy specifically states the following relevant objectives (among many other objectives): (i) to arrest deforestation, and degradation of forest resources, enrich and extend areas under tree cover, through appropriate programs and projects, to ensure that at least 20% of the country comes under tree cover by 2035, with at least a canopy density of 50%; and (ii) to significantly increase tree cover outside state forest, through appropriate mechanisms, in both public and private land including urban areas.	The subproject will have potential tree cutting activities during construction or rehabilitation works. However, the subproject EMP will ensure to implement measures to comply with and support the policy objectives.
Bangladesh Labor Act, 2006	The Bangladesh Labor Act, 2006 provides the guidance of employer's extent of responsibility and workmen's extent of right to get compensation in case of injury by accident while working.	Provides for security and safety of work force during construction period. Compliance with this law will be included in the responsibility of the Contractor.

EMP = environmental management plan, LGI = local government institutions.

F. International Environmental Agreements

39. Table 6 below lists the relevant international environmental agreements that the government is party to, and their relevance to the subproject.

Table 6: International Environmental Agreements Relevant to Second City Region Development Project

International Environmental Agreement	Year Ratified	Details	Relevance
United Nations Framework Convention on Climate Change (UNFCCC)	1997	Parties to take precautionary measures to anticipate, prevent or minimize the causes of climate change and mitigate its adverse effects.	The subproject is subject to impact of climate change. Engineering designs of the subproject consider climate change impacts, such as flooding and river water level rise. A climate change vulnerability assessment has been conducted for the geographic coverage of the entire Second City Region Development Project (the project), which covers the location of the subproject.
Paris Convention on	1983	Parties to ensure the protection and	There is no World Heritage Site within or near any of the subproject

International Environmental Agreement	Year Ratified	Details	Relevance
Protection of the World Cultural and Natural Heritage, 1972		conservation of the cultural and natural heritage situated on territory of, and primarily belonging to, the State	alignments. However, the road and drainage works may impact undiscovered underground cultural and natural heritage relics during construction phase. The subproject environmental management plan (EMP) ensures measures for chance finds.
Ramsar Convention on Wetlands of International Importance, 1971	1992	Parties to conserve and wisely use wetlands (i.e., maintaining their ecological character) as a contribution towards achieving sustainable development locally and throughout the world	Road and drainage construction works may impact wetlands. The subproject EMP ensures measures are in place to protect significant wetland and prevent draining or filling into the wetlands during construction.
Convention on Biological Diversity, 1992	1997	Parties to require the environmental assessment of projects that are likely to have significant adverse effects on biological diversity with a view of avoiding or minimizing such effects	Biodiversity sites and species not previously identified might be discovered during construction works along the alignments. The subproject EMP ensures measures to protect biodiversity, if any, during construction and post-construction activities.

EMP = environmental management plan, UNFCCC = United Nations Framework Convention on Climate Change.

III. DESCRIPTION OF THE SUBPROJECT

A. Subproject Scope and Components

40. The proposed subproject is a combination of construction and rehabilitation of the following road alignments or components: (i) Road 1: Binaichar – Kamrangir Char (Road ID 4082); (ii) Road 2: Fakirbari - Kamrangir Char Majerchargopindir School (Road ID 4083); (iii) Road 3: Bagbari – Naogaon (Road ID 4080); and (iv) Road 4: Mukundi – Araihasar (Road ID 4004). Description of road works is presented in Table 7. All construction works and improvements will be conducted within existing rights-of-way (ROWs). The road widths along the alignments will be varied at different chainage depending on the available space within the existing ROWs to ensure that no encroachment to private properties.

Table 7: Roadway Improvement Components

Road No.	Description	Length (km)	Existing Carriageway Width (m)	Existing Road Width (m)
Road-1	Improvement of Road Binaichar – Kamrangir Char (LRA 3 – Road ID 4082).	3.434	3.0 - 3.7	4.3 - 6.0
	Construction of 15 m Long RCC Deck Girder Bridge at Ch.0+689 m over a Khal	0.0015		5.5
Road-2	Improvement of Road Fakirbari - Kamrangir char Majerchar Gopindir School Road (LRA 4 – Road ID 4083)	4.077	3.0 - 3.7	4.4 - 5.2

Road No.	Description	Length (km)	Existing Carriageway Width (m)	Existing Road Width (m)
Road-3	Improvement of Road Bagbari – Nowagoan (LRA 5 – Road ID 4080)	4.245	3.0 - 3.3	4.3 - 5.2
Road-4	Improvement of Road Mukundi – Araihaazar (LRA 7 – Road ID 4004)	1.800	3.0	4.3 - 5.2

B. Existing Condition of Subproject Components

1. Road-1: Binaichar – Kamrangir Char (Road ID 4082)

41. The subproject is 3.434 kilometers (km) long, which stretches from starting coordinates of N 23°47' 36.8" and E 90°37' 0.7" to ending coordinates of N 23°48' 25.31" and E 90°38' 23.5". This road connects Bhulta-Araihaazar Road with Araihaazar-Noagaop-Dhaka Sylhet Highway, which passes through villages, markets or bazars and open agricultural fields. This road stretches along various ponds, ditches and low-lying areas on both sides; and traverses along and crosses a canal at one section. This canal only serves as rainwater conveyance or passageway during monsoon seasons and practically dry grassy ditches during summer seasons.

42. **Road Condition.** The proposed road subproject is an important existing rural or upazila road that connects the urban and peri-urban areas, and growth centers. This road has varying pavement width ranging from 3.0 m to 3.7 m in different sections (pavement widths of 3.7 m from Chainage 0+000 to 2+840 km; and 3.0 m from Chainage 2+840 to 3+434 km. The road condition is varying in different section. Entire portion of the road is bituminous carpet, and most of the road has suffered wear and tear with cracks, pot-holes, broken edges and depressions. The distressed condition of the road is mainly due to improper drainage facilities and movement of heavy vehicular traffic for a long time without any proper maintenance work. There are several sub-standard horizontal curves. Figure 3 shows some of the existing conditions of this road.

43. **Drains.** There is no functional roadside drain along the alignment of this road. Currently, rain water during monsoon season flows toward the sides of the road which have lower elevation and then flows to nearby canals or ponds. These canals or ponds only serve as rainwater conveyance, passageway, waterlogging areas during monsoon seasons and practically dry grassy ditches or fields during summer seasons.

44. **Structures.** There are two structures: (i) is box culvert (size 2.5 m x 2.5 m) at Chainage 2+450 km for cross drainage purpose; and the other (ii) is a bridge (span 12 m) at Chainage 0+689. The box culvert is in good condition, but the bridge is in poor condition and its replacement has been proposed.

45. **Existing Alignment and Rights-of-Way.** The subproject road is 2-lane road, and it will be improved within existing alignment ROW. The road width varies between 4.30 - 6.0 m and rehabilitation will be undertaken on the carriageway of which width varies between 3.0 m to 3.7 m. The side slope of road embankment will be of 1:1.5. From field investigation, no tree is found along the proposed carriageway. No trees will be cut, and all trees found along the sides of the proposed carriageway will be preserved per detailed design.

46. **Strip Map.** The strip map showing the locations of the structures along this alignment is in Appendix 4. The strip map was drawn as a result of the field surveys conducted along the alignment and show that no physical cultural resources will be encroached or affected.

Figure 3: Site Photographs from Binaichar-Kamrangir Char Road



2. Road-2: Fakirbari - Kamrangir char Majerchar Gopindir School Road (Road ID 4083)

47. **Road Location.** The subproject is 4.077 km long, which stretches starting from coordinates N 23°47' 24.36" and E 90°37' 51.22" and ends at coordinates N 23°48' 20.55" and E 90°38' 38.79". This road connects Bhulta-Araihazar road near a bridge close to Kalibari. This road passes through built-up areas such as markets or bazars, agricultural or open fields, sporadically distributed rural residential settlements and some low-lying ponds, ditches or canals areas on both sides of the road alignment. The canals only serve as rainwater conveyance or passageway during monsoon seasons and practically dry grassy ditches during summer seasons. Likewise, the ponds are only rainwater containment ponds during monsoon seasons and practically grassy or dry open fields during summer seasons.

48. **Road Condition.** The proposed road subproject is an important existing rural/upazila road that connects the urban/peri-urban areas and growth centers. This road has varying pavement width ranging from 3.0 m to 3.7 m in different sections (pavement width 3.7 m is from Chainage 0+000 - 0+267 km and 0+267-1+067; 3.0 m width is from Chainage 2+260 - 2+499 km; The road condition is varying in different section. Entire portion of the road is bituminous carpeting, and most of the road has suffered wear and tear with cracks, pot-holes, broken edges and depressions. The distressed condition of the road is due to mainly improper drainage facilities and movement of heavy vehicular traffic for a long time without any proper maintenance work. There are several sub-standard horizontal curves. Figure 4 shows some of the existing conditions of this road.

49. **Drains.** There is no functional roadside drain along the alignment of the road. Construction of rectangular RCC drain (width: 1.0 m; depth: 0.97 - 1.6 m) of length 360m on both sides of the road at Chainage 0+000 – 0+260 m and 2+250 – 2+350 has been proposed.

50. **Drainage Structures.** There are four cross drainage structures along the entire road length. These are (i) one box culvert (size 2.00 m x 4.50 m x 4.50 m) which is in good condition; and (ii) three open foundation culvert (OFC) of different sizes (1.65 m wide x 1.65 m long, 7.00 m wide x 3.60 m long and 3.80 m wide x 3.80 m long) at Chainage 0+774, 1+067 and 2.499 km respectively. These OFCs are partly damaged and in poor condition, and these require replacement.

51. **Existing Alignment and Rights-of-Way.** The subproject road is 2-lane road, and it will

be improved within existing alignment ROW. The road width varies between 4.4 m - 5.2 m and rehabilitation will be undertaken on the carriageway of which width varies between 3.0 m - 3.7 m. The side slope of road embankment will be of 1:1.5. From field investigation, no tree is found along the proposed carriageway. No trees will be cut, and all trees found along the sides of the proposed carriageway will be preserved per detailed design.

52. **Strip Map.** The strip map showing the locations of the structures along this alignment is in Appendix 4. The strip map was drawn as a result of the field surveys conducted along the alignment and show that no physical cultural resources will be encroached or affected.

Figure 4: Site Photographs from Fakirbari - Kamrangir char Majerchar Gopindir School Road



3. Road-3: Bagbari – Nowagoan Road (LRA 5 – Road ID 4080)

53. **Road Location:** The subproject is 4.245 km long, which starts from coordinates N 23°51' 20.86" and E 90°38' 48.47" and ends at coordinates N 23°49' 35.14" and E 90°38' 9.99". This road connects Araihasar-Noagaon-Dhaka Sylhet Highway road with Dhaka Sylhet Highway at Bagbari, where a small market place and some industrial establishments are located. This road passes through some industrial establishments, markets or bazars, low-lying agricultural or open fields, sporadically scattered rural residential settlements and some low-lying ditches or ponds on both sides of the road alignment. The ditches only serve as rainwater conveyance or passageway during monsoon seasons and practically dry grassy areas during summer seasons. Likewise, the ponds are only rainwater containment ponds during monsoon seasons and practically grassy or dry open fields during summer seasons.

54. **Road Condition.** The proposed road subproject is an important existing rural/upazila road that connects the urban/peri-urban areas and growth centers. The road has varying carriageway width ranging from 3.0 m to 3.3 m. The road condition is varying at different sections. Entire portion of the road is bituminous carpet, and most of the road has suffered wear and tear with cracks, pot-holes, broken edges and depressions. The distressed condition of the road is mainly due to poor drainage system and movement of heavy vehicular traffic for a long time without any proper maintenance work. There are several sub-standard horizontal curves. Figure 5 shows some of the existing conditions of this road.

55. **Drains:** There is no functional roadside drain along the alignment of the subject road.

Construction of rectangular RCC drains (width: 1.0 m; depth: 0.87 m - 1.6 m, length: 245 m) on both sides of the road at Ch. 0+000 – 0+245 m has been proposed.

56. **Drainage Structures:** There are three cross drainage structures in the form of box culverts found along this alignment. These box culverts are in good condition and have sizes of 2.00 m x 3.50 m x 3.50 m, 2.00 m x 2.00 m x 2.00 m and 2.00 m x 2.00 m x 2.00 m at Ch. 0+004, 0+953 and 1+178 km, respectively. Also, a 12.60 m bridge exists at Ch. 2+909 km, and is likewise in good condition.

57. **Existing Alignment and Rights-of-Way.** The subproject road is 2-lane road, and it will be improved within existing alignment/ROW. The road width is varying in between 4.30 - 5.2 m and rehabilitation will be undertaken on the carriageway of width varying in between 3.0 - 3.3 m. The side slope of road embankment will be of 1:1.5. From field investigation, no tree is found along the proposed carriageway. No trees will be cut, and all trees found along the sides of the proposed carriageway will be preserved per detailed design.

58. **Strip Map.** The strip map showing the locations of the structures along this alignment is in Appendix 4. The strip map was drawn as a result of the field surveys conducted along the alignment and show that no physical cultural resources will be encroached or affected.

Figure 5: Bagbari – Nowagoan Road (LRA 5 – Road ID 4080)



4. Road-4: Mukundi – Araihasar Road (LRA 7 – Road ID 4004)

59. **Road Location.** The subproject road is composed of a 1.50 km main road and a 0.30 km link road. The main road starts at coordinates N 23°47' 53.00" and E 90°38' 58.01" and ends at coordinates N 23°47' 42.94" and E 90°39' 38.54". The link road starts at coordinates N 23°47' 47.83" and E 90°39' 19.48" and ends at coordinates N 23°47' 58.35" and E 90°39' 18.53". These two roads pass through low-lying agricultural or open fields, sporadically distributed rural residential settlements and some low-lying canals or ponds on both sides of the road alignment. The canals only serve as rainwater conveyance or passageway during monsoon seasons and practically dry grassy ditches during summer seasons. Likewise, the ponds are only rainwater containment ponds during monsoon seasons and practically grassy or dry open fields during summer seasons.

60. **Road Condition.** The proposed road subproject is an important existing rural/upazila road

that connects the urban/peri-urban areas and growth centers. The existing carriage way width for the entire road length is 3.0 m. The road condition is varying at different section. Entire portion of the road is bituminous carpet, and most of the road has suffered wear and tear with cracks, pot-holes, broken edges and depressions. The distressed condition of the road is mainly due to stagnation of rainwater in broken portions or potholes and worsened by continuous movement of heavy vehicles for a long time without any proper maintenance work. There are several sub-standard horizontal curves. Figure 6 shows some of the existing conditions along this alignment.

61. **Drains.** There is no functional roadside drain along the alignment of the subject road. During monsoon season, rainwater flows to the low-lying side sections of this road alignment. No road side drain has been proposed for this alignment.

62. **Drainage Structures.** There are three existing drainage structures along this alignment. These are (i) one box-culvert at Chainage 0+138 km, and (ii) two U-Drains of width 0.90 m at Chainage 1+094 km, and 1+396 km, respectively.

63. **Existing Alignment and Rights-of-Way.** The subproject road is 2-lane road, and it will be improved within existing alignment/ROW. The road width is varying in between 4.30 - 5.2 m and carriageway width is 3.0. No trees were found to exist within the road alignment/ROW. The side slope of road embankment will be of 1:1.5. From field investigation, no tree is found along the proposed carriageway. No trees will be cut, and all trees found along the sides of the proposed carriageway will be preserved per detailed design.

64. **Strip Map.** The strip map showing the locations of the structures along this alignment is in Appendix 4. The strip map was drawn as a result of the field surveys conducted along the alignment and show that no physical cultural resources will be encroached or affected.

Figure 6: Mukundi – Araihaazar Road (LRA 7 – Road ID 4004)



C. Proposed Interventions or Development

65. **Road-1: Improvement of Road Binaichar – Kamrangir Char (LRA 3 – Road ID 4082).** Proposed interventions planned for the Existing Road (ID No. 4082) Binaichar – Kamrangir Char of length 3.434 km (Chainage 0+000 m to 3+434 km) are as follows:

- (i) Improvement of the existing 2-lane road, including footpath on both sides of the road within the ROW;

- (ii) Reconstruction and replacement of the existing bridge to a 15 m long RCC deck girder bridge;
- (iii) Pavement works comprising construction of sub-grade, sub-base, base binder course and wearing course;
- (iv) Road improvement based on design that considers road safety requirement per LGED published guidelines and standards. This includes planning of cross section, bus and truck stand; and
- (v) Protection works (palisading) to be undertaken at locations where ditches and ponds adjacent to the road embankment are found. These will protect road edges from being eroded or sliding. Locations and lengths of proposed protection works at different sections are shown in Table 8 below.

Table 8: Locations and Lengths of Proposed Protection Works Along Binaichar – Kamrangir Char Road (LRA 3 – Road ID 4082)

Sl. No.	Left Side Chainage and Length	Right Side Chainage and Length
1	1+200 - 1+235 (35 m)	1+355 - 1+375 (20 m)
2	1+420 - 1+450 (30 m)	2+030 - 2+055 (25 m)
3	3+225 - 3+245 (20 m)	2+060 - 2+090 (30 m)
Total length	85 m	75 m

66. The existing status with proposed development interventions of this road component is summarized in Table 9.

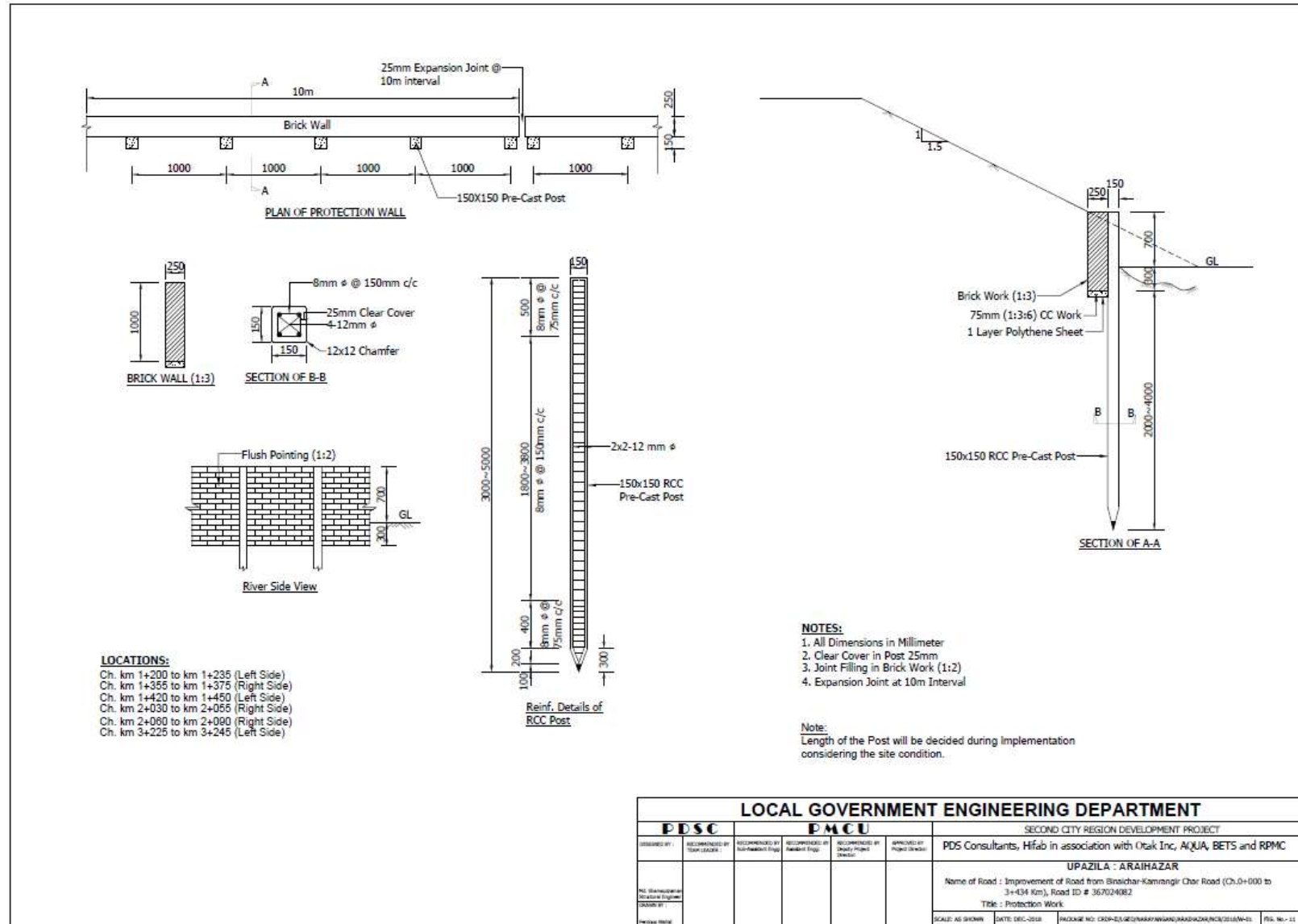
67. The typical section for the roadway design considerations with their cross-sections are shown in Figures 7, 8, 9 and 10.

Table 9: Summary of Improvement Works for Binaichar – Kamrangir Char Road
(LRA 3 – Road ID 4082)

Road/Drain age Improvem ent Compone nts	Length to be Improv ed (km)	Chaina ge (m)	Present conditio n	Existing/ Proposed Carriage way Width(m)	Existin g Road Width (m)	Proposed Development
Package W-01						
Road a) Improveme nt of Road Binaichar – Kamrangir Char	3.434	a) 0+000- 2+840 b) 2+840 – 3+350	Partial damage d BC, cracks, potholes , broken edge and depressi ons Partial damage d BC, cracks, potholes , broken edge and depressi ons	3.0 - 3.7 / 3.7 3.0 / 3.0	4.30 – 6.00 4.30 – 6.0	Remove existing damaged BC, provide 100mm WBM and 40mm dense BC carpeting over the total width of the carriageway. Provide soft shoulder of width 775mm at each side of pavement. Improved to Rigid Pavement (CC) providing with all standard pavement base layers. Further provide hard shoulders (200mm sand filling, 75mm BFS and Uni-block 220x110x80mm) of width 1250mm and soft shoulder of width 800mm at each side of Pavement. Note: Width of hard / soft shoulder will be varied depending on the availability of free space.
Improveme nt of Bridge Approach Road	2 Ends x 30 m			3.0 - 3.7 / 5.5		Provide 150mm WBM, 40mm dense BC over 250mm ISG and 200mm AS

BFS = blast furnace slag, ISG = improved subgrade, km = kilometer, LRA = link road Araihaazar, m = meter, mm = millimeter, WBM = water bound mecadam.

Figure 9: Typical Cross Section of Protection Works



68. **Road-2: Fakirbari - Kamrangir char Majerchar Gopindir School Road (Road ID 4083).** Proposed interventions planned for the Existing Road (ID No. 4083) Fakirbari - Kamrangir char Majerchar Gopindir School Road of length 4.077 km (Chainage 0+000 m to 4+077 km) are as follows:

- (i) Improvement of the existing 2-lane road, including footpaths at both sides of the road within ROW;
- (ii) Construction of three box culverts to replace the existing three OFCs that are partly damaged and in poor condition;
- (iii) Pavement works comprising construction of sub-grade, sub-base, base binder course and wearing course;
- (iv) Road improvement based on design that considers the road safety requirements per LGED published guidelines and standards. This includes planning of cross section, bus and truck stand; and
- (v) Protection works (palisading) undertaken at locations where ditches and ponds adjacent to the road embankment are found. These will protect road edges from being eroded or sliding. Locations and lengths of proposed protection works at different sections are shown in Table 10 below.

Table 10: Locations and Lengths of Proposed Protection Works Along Fakirbari - Kamrangir char Majerchar Gopindir School Road (Road ID 4083)

Sl. No.	Left Side Chainage and Length	Right Side Chainage and Length
1	0+925 - 0+955 (30 m)	0+200 - 0+270 (70 m)
2	1+200 - 1+260 (60 m)	0+360 - 0+410 (50 m)
3	1+995 - 2+010 (15 m)	0+675 - 0+725 (50 m)
4	3+135 - 3+150 (15 m)	0+800 - 0+820 (20 m)
5	3+155 - 3+225 (70 m)	0+930 - 0+940 (10 m)
6	3+845 - 3+875 (30 m)	1+085 - 1+130 (45 m)
7	3+905 - 3+925 (20 m)	1+185 - 1+205 (20 m)
8		1+240 - 1+290 (50 m)
9		1+935 - 1+985 (50 m)
10		3+205 - 3+240 (35 m)
Total length	240 m	400 m

m = meter.

69. The existing status with proposed development interventions of this road component is summarized in Table 11.

70. The typical section for the roadway design considerations with their cross-sections are exhibited in the following Figures 11 to 15.

**Table 11: Summary of Proposed Improvement Works for Fakirbari - Kamrangir char Majerchar Gopindir School Road
(Road ID 4083)**

Road/Drainage Improvement Components	Length to be Improved (km)	Chainage (m)	Present condition	Existing/Proposed Carriageway Width (m)	Existing Road Width (m)	Proposed Development
Package W-01						
<u>Road</u> b) Improvement of Road Fakirbari - Kamrangir char – Majerchar- Gopindir School	.077	0+000 - 0+267	Partial damaged BC, cracks, potholes, broken edge and depressions	3.0 - 3.7 / 3.7	4.40 – 5.20	Improved to Rigid Pavement (CC) providing with all standard pavement base layers. Further provide hard shoulders (200mm sand filling, 75mm BFS and Uni-block 220x110x80mm) of width 900mm/1250mm and soft shoulder of width 800mm at each side of pavement. Note: Width of hard / soft shoulder will be varied depending on the availability of free space.
		2+330 - 2+500		3.0 / 3.0		
		1+067 - 2+185		3.7 / 3.7		
		0+267 - 1+067	Partial damaged BC, cracks, potholes, broken edge and depressions	3.0 - 3.7 / 3.7	4.40 – 5.20	Improved to Rigid Pavement (CC) providing with all standard pavement base layers. Soft shoulder of width 800mm at each side of pavement. Note: Width of soft shoulder will be varied depending on the availability of free space.
		2+500 - 4+077		3.0 / 3.0		Remove existing damaged BC, provide 100mm WBM and 40mm dense BC carpeting over the total width of the carriageway. Soft shoulder of width 775mm at each side of pavement. Note: Width of soft shoulder will be varied depending on the availability of free space.

Road/Drainage Improvement Components	Length to be Improved (km)	Chainage (m)	Present condition	Existing/Proposed Carriageway Width (m)	Existing Road Width (m)	Proposed Development
						1125mm at each side of pavement. Note: Width of soft shoulder will be varied depending on the availability of free space.
<u>Drain</u> Construction of drain on both sides of the subproject road at Ch.0+000-0+260 km and 2+250-2+350 km	360 m	at: Ch. 0+000- 0+260 km (260 m) & 2+250-2+350 km (100 m)				Construction of rectangular RCC drain (width: 1000 mm; depth: 615 mm - 1446 mm)

km = kilometer, m = meter, mm = millimeter, RCC = reinforced cement concrete, WBM = water bound mecadam.

Figure 10: Typical Cross Section of the Road (Ch. 0+000 - 0+267 kilometer)

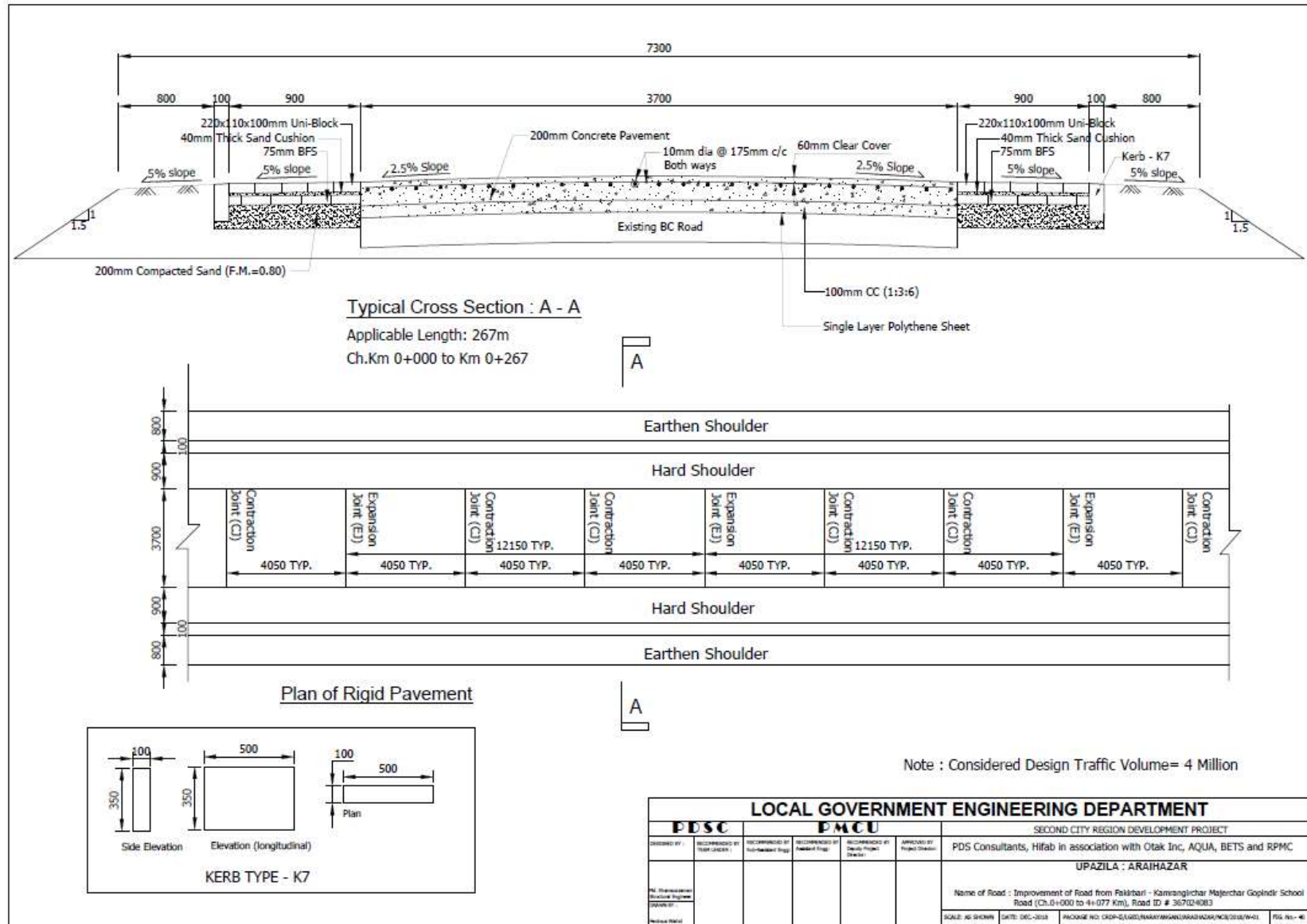


Figure 11: Typical Cross Section of the Road (Ch. 0+267-1+067 kilometer)

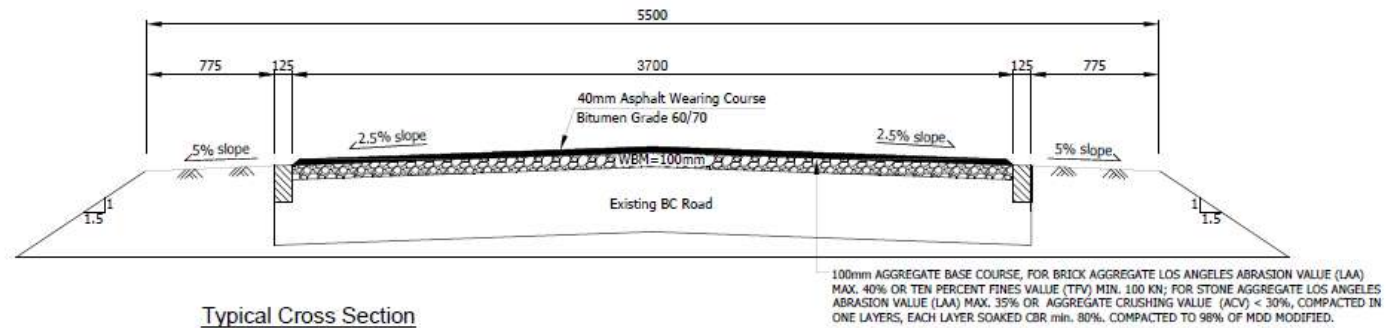


Figure 12: Typical Cross Section of the Road (Ch. 1+067 - 2+185 kilometer)

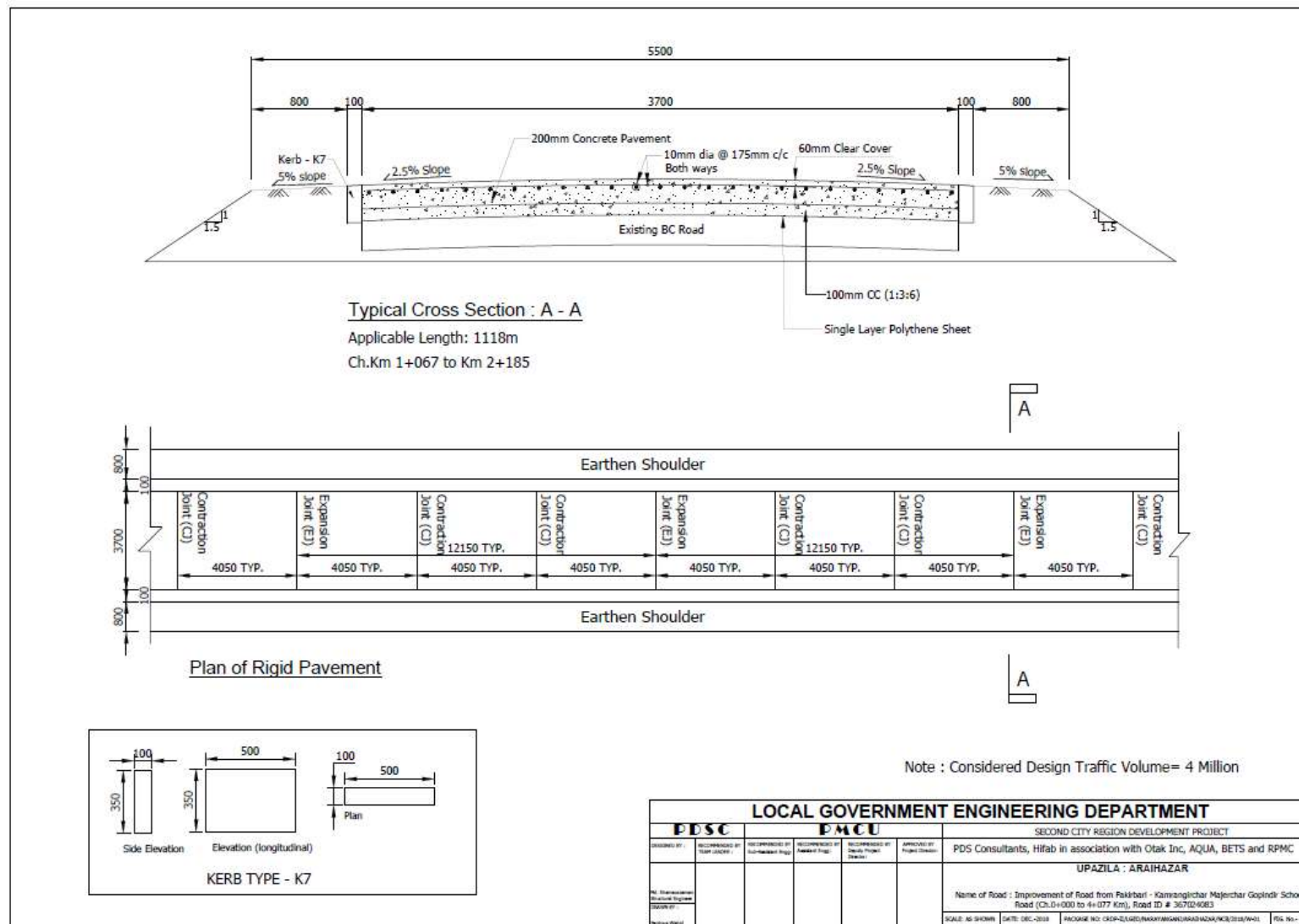


Figure 14: Typical Cross section of the Road (Ch. 2+500 - 4+077 kilometer)

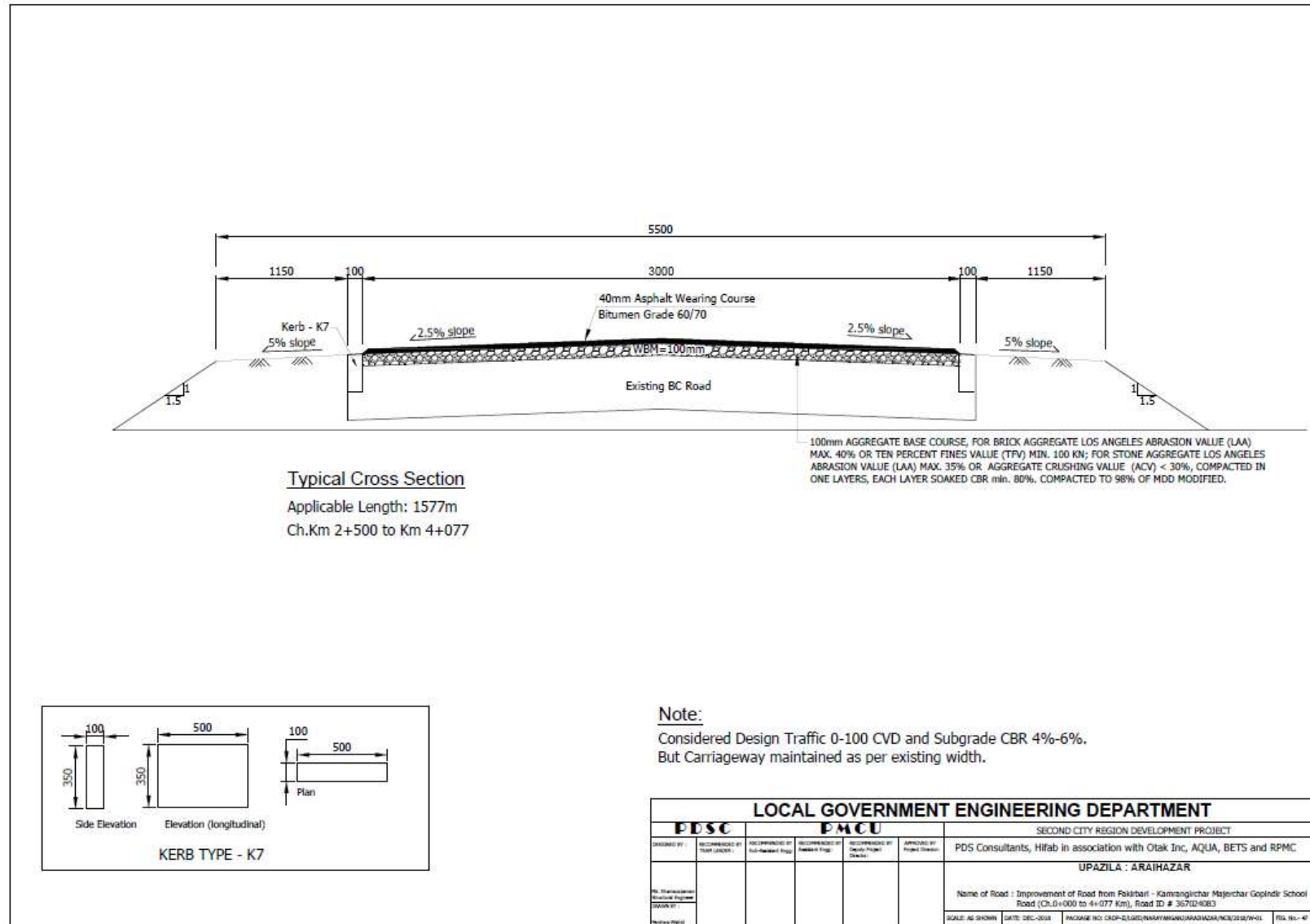


Figure 15: Typical Cross section of Protection Work

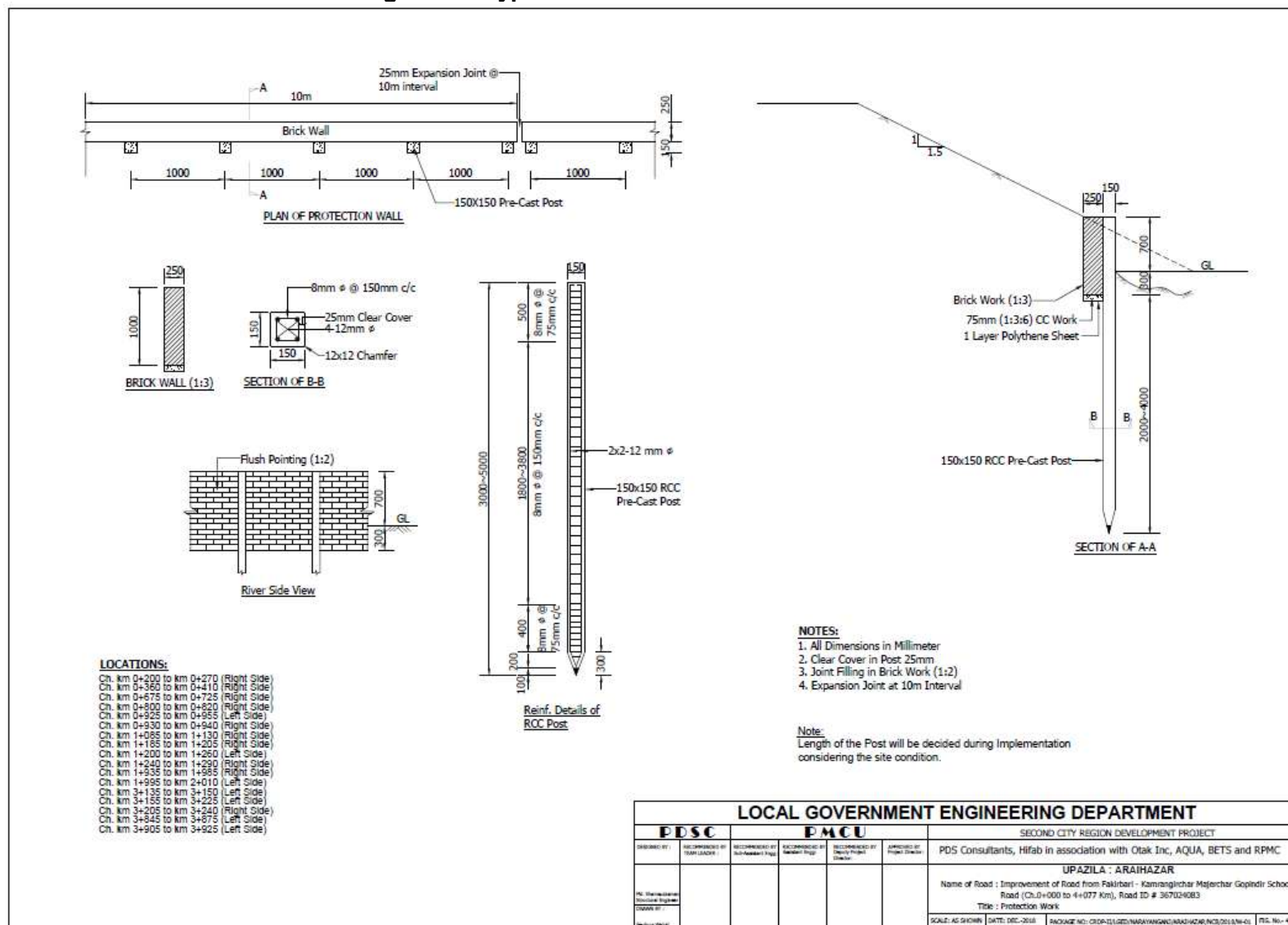
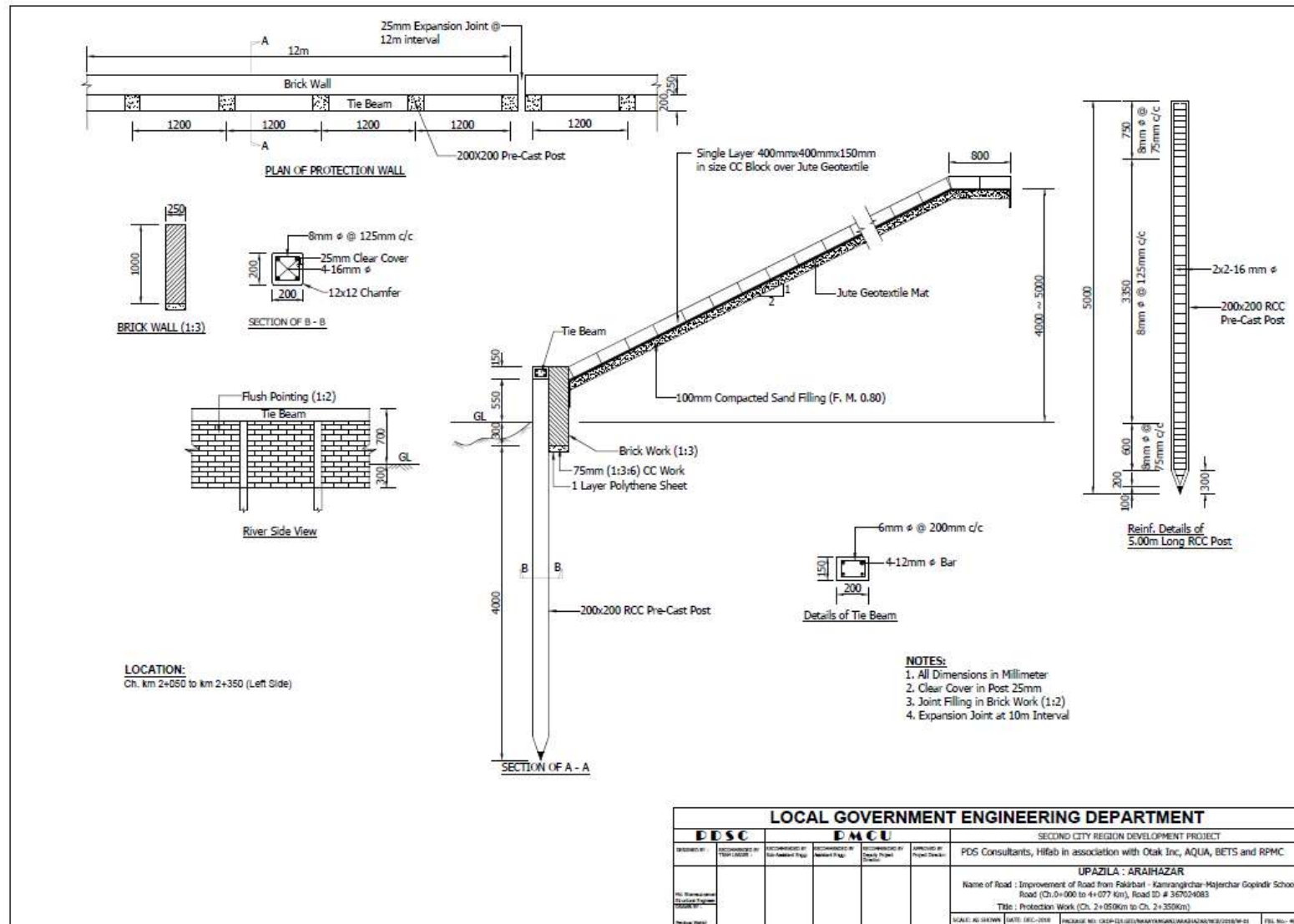


Figure 16: Typical Cross section of Protection Work



71. **Road-3: Improvement of Bagbari - Naogaon Road (Road ID 4080).** Proposed interventions planned for the Existing Road (ID No. 4080) Bagbari - Naogaon Road of length 4.245 km (Ch.0+000 m to 4+245 km) are as follows:

- (i) Improvement of the existing 2-lane road, including footpaths on both sides which are within ROW;
- (ii) Pavement works comprising construction of sub-grade, sub-base, base binder course and wearing course;
- (iii) Road improvement based on design that considers the road safety requirements per LGED published guidelines and standards. This includes planning of cross section, bus and truck stand; and
- (iv) Protection works (palisading) undertaken at locations where ditches and ponds adjacent to the road embankment are found. These will protect road edges from being eroded or sliding. Locations and lengths of proposed protection works at different sections are shown in Table 12 below.

Table 12: Locations and Lengths of Proposed Protection Works at Bagbari - Naogaon Road (Road ID 4080)

Sl. No.	Left Side Chainage and Length	Right Side Chainage and Length
1	0+650 - 0+665 (15 m)	0+170 - 0+195 (25 m)
2	0+860 - 0+885 (25 m)	0+240 - 0+300 (60 m)
3	0+930 - 0+970 (40 m)	0+485 - 0+520 (35 m)
4	0+980 - 1+000 (20 m)	1+110 - 1+178 (68 m)
5	1+045 - 1+060 (15 m)	2+405 - 2+420 (15 m)
6	1+140 - 1+150 (10 m)	3+090 - 3+115 (25 m)
7	1+355 - 1+375 (20 m)	4+220 - 4+242 (22 m)
8	1+390 - 1+425 (35 m)	
9	1+530 - 1+620 (90 m)	
10	1+660 - 1+750 (90 m)	
11	1+760 - 1+810 (50 m)	
12	1+825 - 1+875 (50 m)	
13	2+405 - 2+425 (20 m)	
14	2+710 - 2+790 (80 m)	
15	2+838 - 2+878 (40 m)	
16	2+990 - 3+030 (40 m)	
17	3+152 - 3+160 (8 m)	
18	3+610 - 3+650 (40 m)	
19	3+765 - 3+790 (25 m)	
20	3+880 - 3+910 (30 m)	
21	4+200 - 4+210 (10 m)	
22	4+225 - 4+240 (15 m)	
Total length	768 m	250 m

m = meter.

72. The existing status with proposed development interventions of this road component is summarized in Table 13.

73. The typical section for the roadway design considerations with their cross-sections are exhibited in the following Figures 16 to 20.

Table 13: Summary of Proposed Improvement Works for Bagbari – Naogaon Road (Road ID 4080)

Table 10: Summary of Proposed Improvement Works for Bagbari - Naogaon Road (Road ID: 1000)						
Road/Drainage Improvement Components	Length to be Improved (km)	Chainage (m)	Present condition	Existing/Proposed Carriageway Width (m)	Existing Road Width (m)	Proposed Development
Package W-01						
Road						
c) Improvement of Road Bagbari - Naogaon	4.245	0+000 - 0+245	Partial damaged BC, cracks, potholes, broken edge and depressions	3.0 / 3.0	4.30 – 5.20	Improved to Rigid Pavement(CC) providing with all standard pavement base layers. Further provide hard shoulders (200mm sand filling, 75mm BFS and Uni-block 220x110x80mm) of width 1150mm/0mm and soft shoulder of width 1000mm/1250mm at each side of pavement. Note: Width of hard / soft shoulder will be varied depending on the availability of free space.
		2+920 - 4+245		3.0 / 3.0		
		0+245 - 2+908	Partial damaged BC, cracks, potholes, broken edge and depressions	3.0 / 3.0	4.30 – 5.20	Remove existing damaged BC; provide 100mm WBM and 40mm dense BC carpeting over the total width of the carriageway. Soft shoulder of width 1125mm at each side of pavement. Note: Width of soft shoulder will be varied depending on the availability of free space.
Drain						
Construction of drain on both sides of the subproject road at Ch.0+000- 0+245 km	245 m	At location: Ch.0+000 - 0+245 km (245m)				Construction of rectangular RCC drain (width: 1000mm; depth: 998 mm ~ 1745 mm)

Figure 17: Typical Cross section of the Road (Ch. 0+000 - 0+245 kilometer)

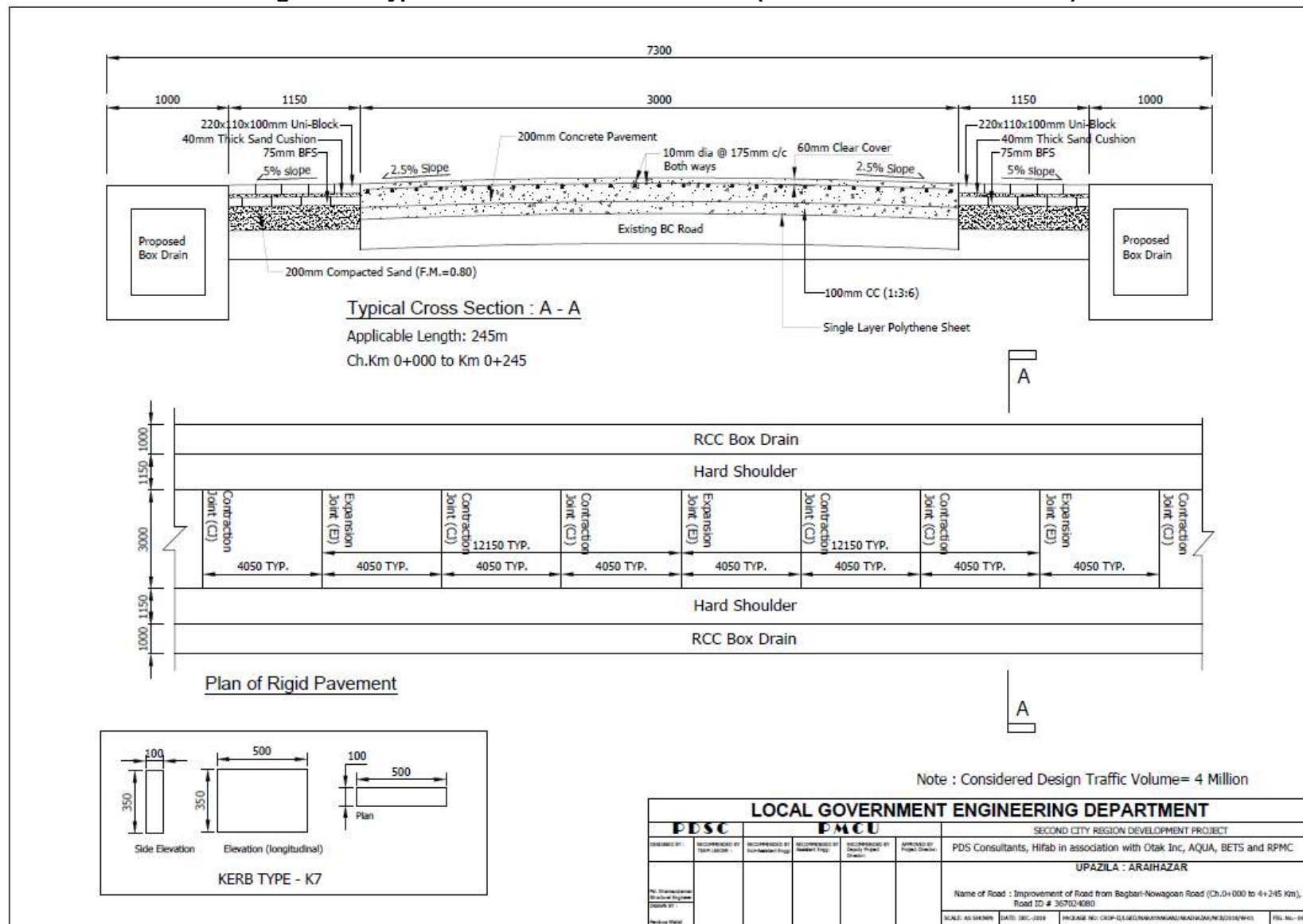


Figure 19: Typical Cross section of the Road (Ch. 2+920 - 4+245 kilometer)

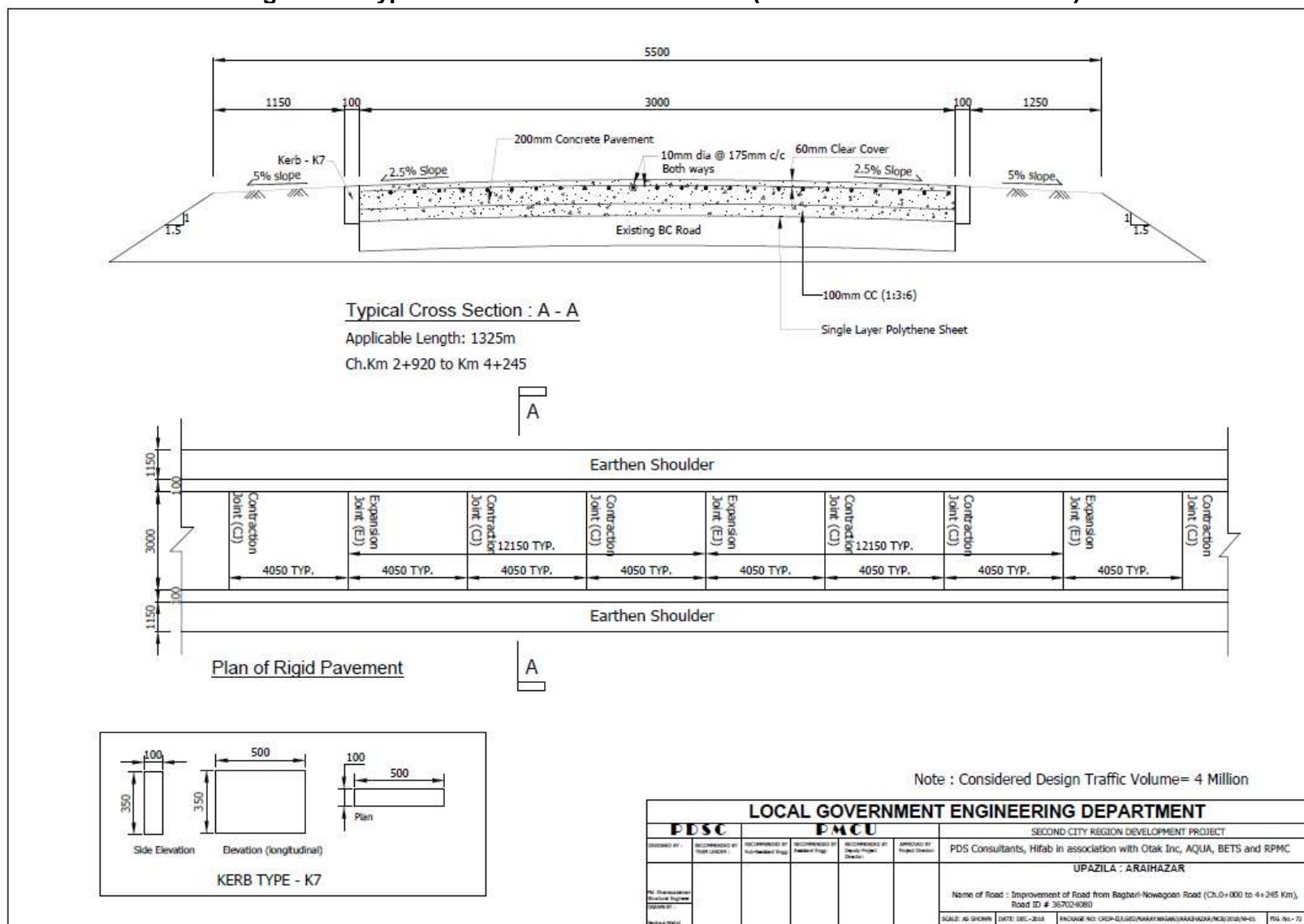


Figure 20: Typical Cross section of Protection Work

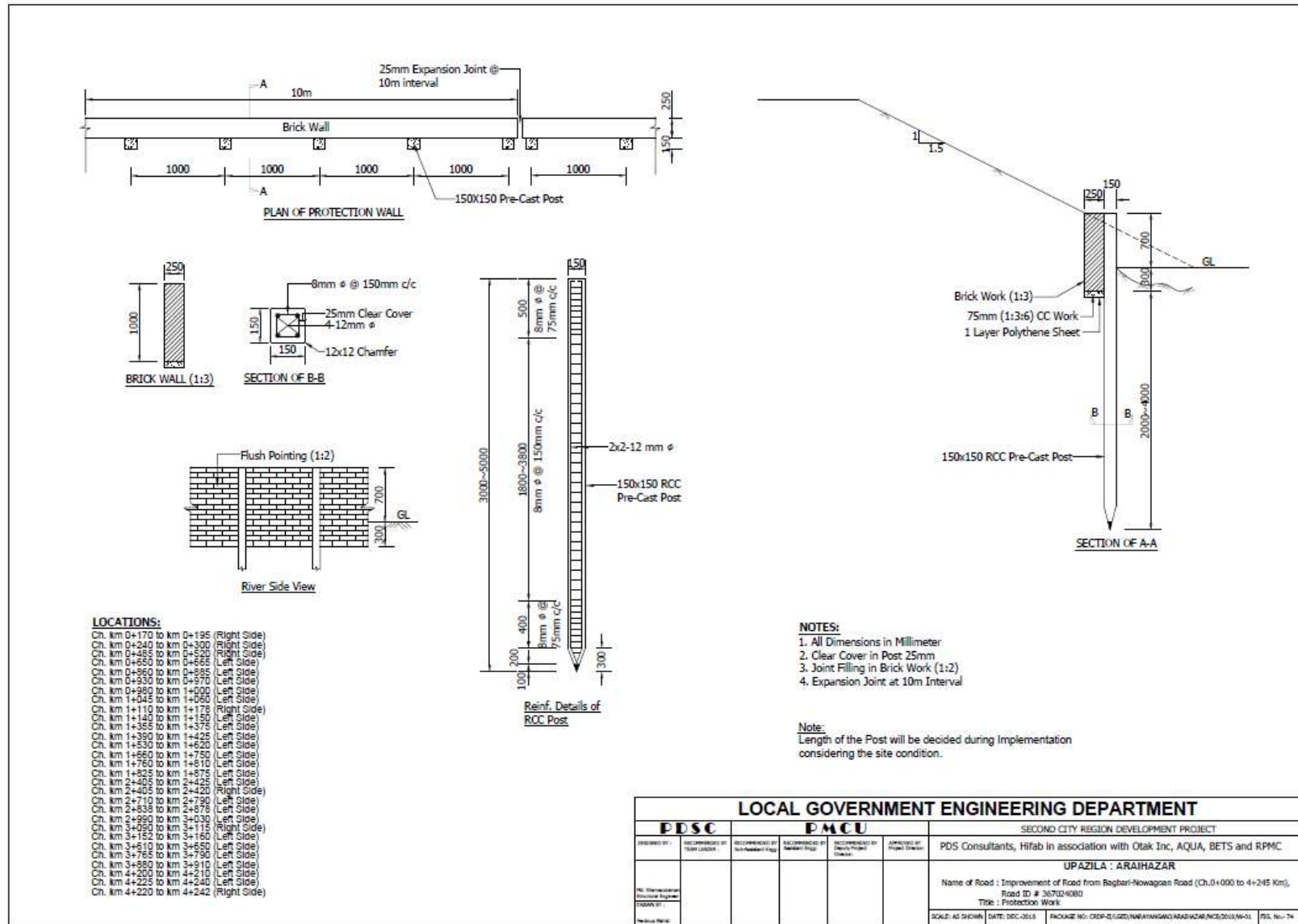
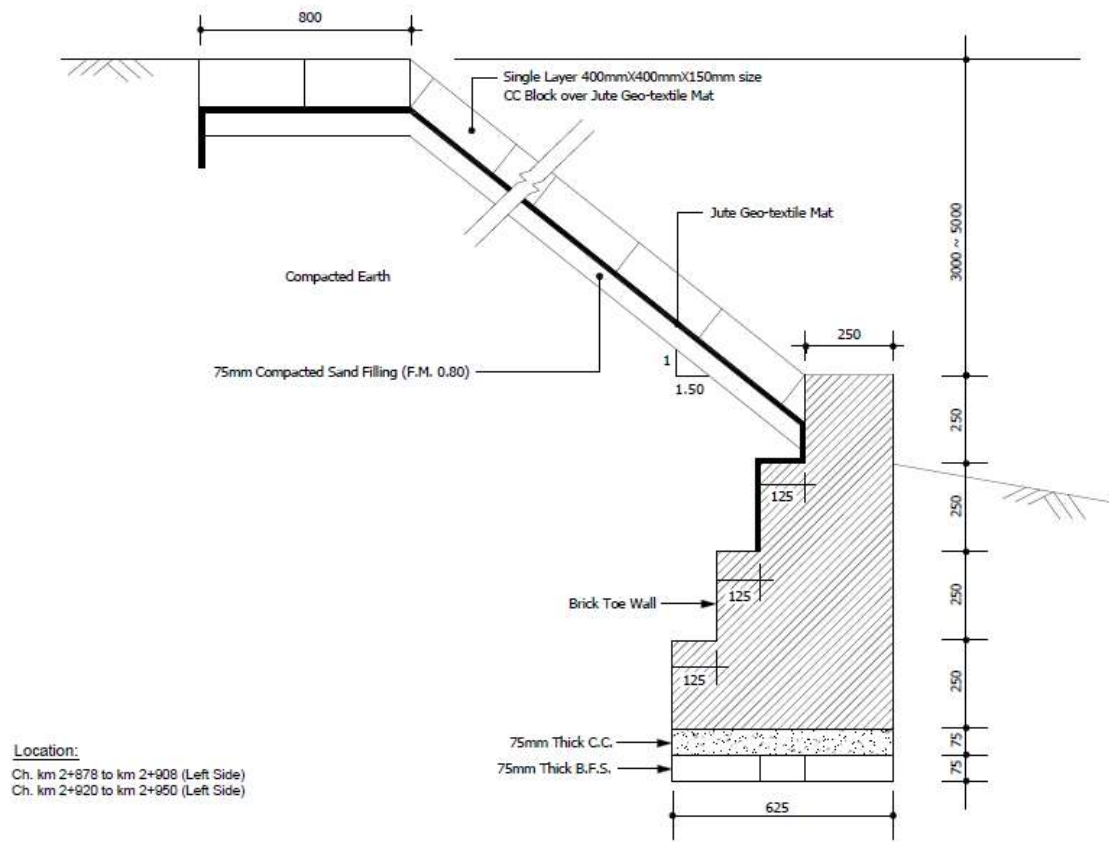


Figure 21: Typical Cross section of Protection Work

**Location:**

Ch. km 2+878 to km 2+908 (Left Side)

Ch. km 2+920 to km 2+950 (Left Side)

LOCAL GOVERNMENT ENGINEERING DEPARTMENT

PDS		PMCU		SECOND CITY REGION DEVELOPMENT PROJECT	
DESIGNED BY :	RECOMMENDED BY :	RECOMMENDED BY :	RECOMMENDED BY :	APPROVED BY :	PDS Consultants, Hifab in association with Otak Inc, AQUA, BETS and RPMC
	Project Engineer	Sub-Headed Engg.	Headed Engg.	Deputy Project Director	
Name of Road : Improvement of Road from Bagbari-Nowagan Road (Ch. 0+000 to 4+245 Km), Road ID # 36702-0080		UPAZILA : ARAHAZAR		Title : Protection Work at Bridge Approaches	
Scale : As shown		Date : Dec-2018		Project No : CRP-CLUE/ENR/AR/HAZ/NOG/NO/2018/04/01	
Project No :		Date :		File No : 75	

74. **Road 4: Improvement of Mukundi - Araihasar Road (Road ID 4004).** Proposed interventions planned for the Existing Mukundi - Araihasar Road of length 1.500 km (Ch.0+000m to 1+500 km) and a link road of 0.300 km are as follows:

- (i) Improvement of the existing 2-lane road, including footpaths on both sides of the road which are within ROW;
- (ii) Replacement of the existing box culvert and the other two U-drains structures together with the construction of proposed cross drains of size 1.00 m x 1.20 m;
- (iii) Pavement works comprising construction of sub-grade, sub-base, base binder course and wearing course;
- (iv) Road improvement based on design that considers the road safety requirements per LGED published guidelines and standards. This includes planning of cross section, bus and truck stand; and
- (v) Protection works (palisading) undertaken at the locations where ditches and ponds adjacent to the road embankment are found. These will protect road edges from being eroded or sliding. Locations and lengths of proposed protection works at different sections are shown in Table 14 below:

Table 14: Locations and Lengths of Proposed Protection Works Along Mukundi - Araihasar Road (Road ID 4004)

Sl. No.	Left Side Chainage and Length	Right Side Chainage and Length
1	0+555 - 0+605 (50 m)	0+125 - 0+140 (15 m)
2	0+640 - 0+655 (15 m)	0+610 - 0+640 (30 m)
3	0+775 - 0+810 (35 m)	0+775 - 0+830 (55 m)
4		1+396 - 1+465 (69 m)
5		1+470 - 1+505 (35 m)
Total length	100 m	204 m

m = meter.

75. The existing status with proposed development interventions of this road component is summarized in Table 15.

76. The typical section for the roadway design considerations with their cross-sections are exhibited in the following Figures 21 to 23.

**Table 15: Summary of Proposed Improvement Works for Mukundi – Araihaazar Road
(Road ID 4004)**

Road/Drainage Improvement Components	Length to be Improved (km)	Chainage (m)	Present condition	Existing/ Proposed Carriage way Width (m)	Existing Road Width (m)	Proposed Development
Package W-01						
<u>Road</u> Improvement of Road Mukundi - Araihaazar	1.500	0+000 - 0+768	Partial damaged BC, cracks, potholes, broken edge and depressions	3.0 / 3.0	4.30 – 5.20	Improved to Rigid Pavement (CC) providing with all standard pavement base layers. Soft shoulder of width 1150 mm at each side of pavement. Note: Width of soft shoulder will be varied depending on the availability of free space.
		0+768 - 1+500	Partial damaged BC, cracks, potholes, broken edge and depressions	3.0 / 3.0	4.30 – 5.20	Remove existing damaged BC; provide 100mm WBM and 40mm dense BC carpeting over the total width of the carriageway. Soft shoulder of width 1125mm at each side of pavement. Note: Width of soft shoulder will be varied depending on the availability of free space.
	0.280 + 0.020 Total:0.300	0+000-0+280 0+280-0+300		3.0 / 3.0	4.30 – 5.20	Remove existing damaged HBB; provide 250mm ISG 200mm Sub Base, 150mm Base and 40mm dense BC over the total width of the carriageway. Note: Width of soft shoulder will be varied depending on the availability of free space.
<u>Link Road</u> Connecting to Gazipur HBB and Chowgoria Road						

Figure 22: Typical Cross Section of the Road (Ch. 0+000 - 0+768 kilometer)

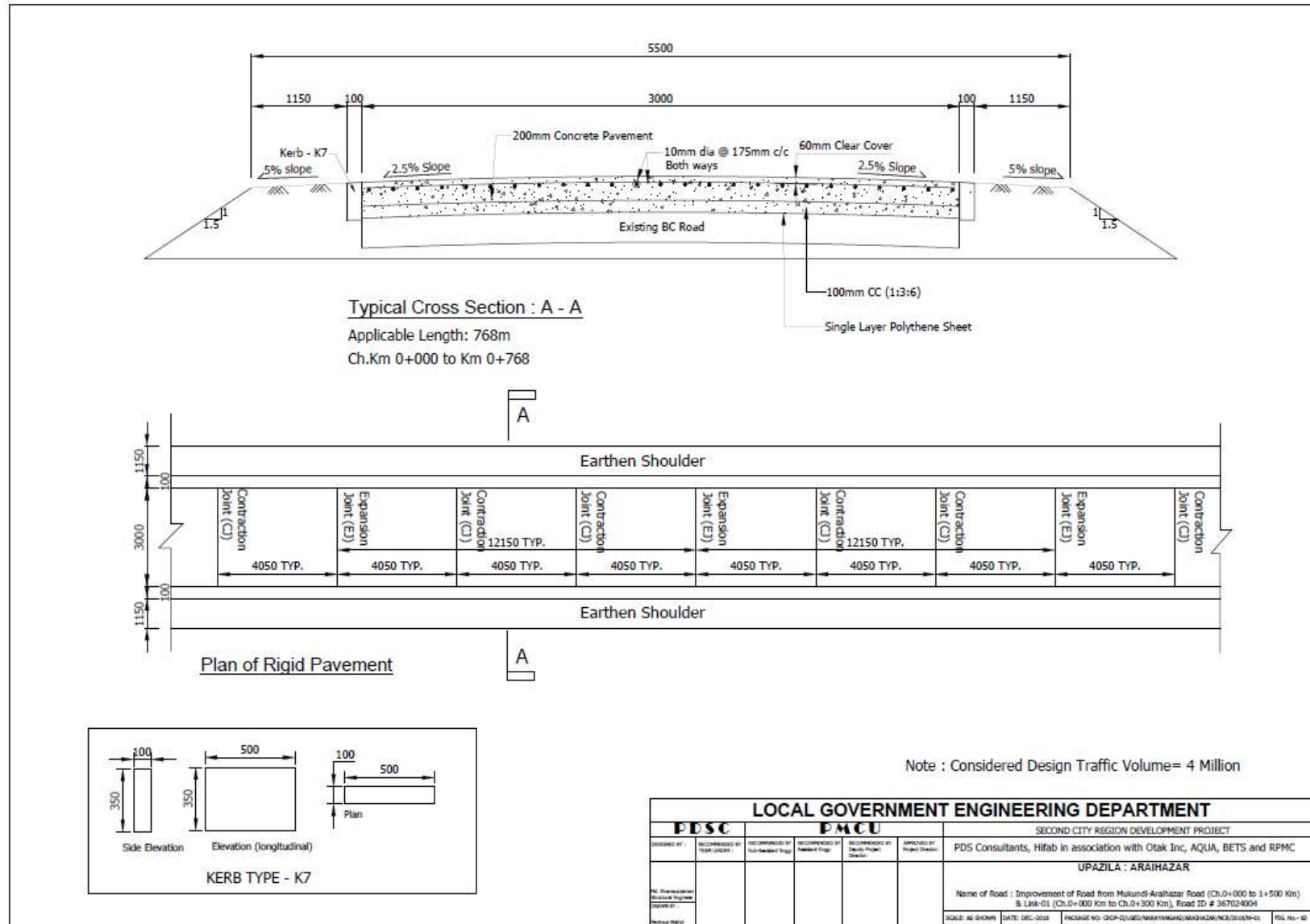
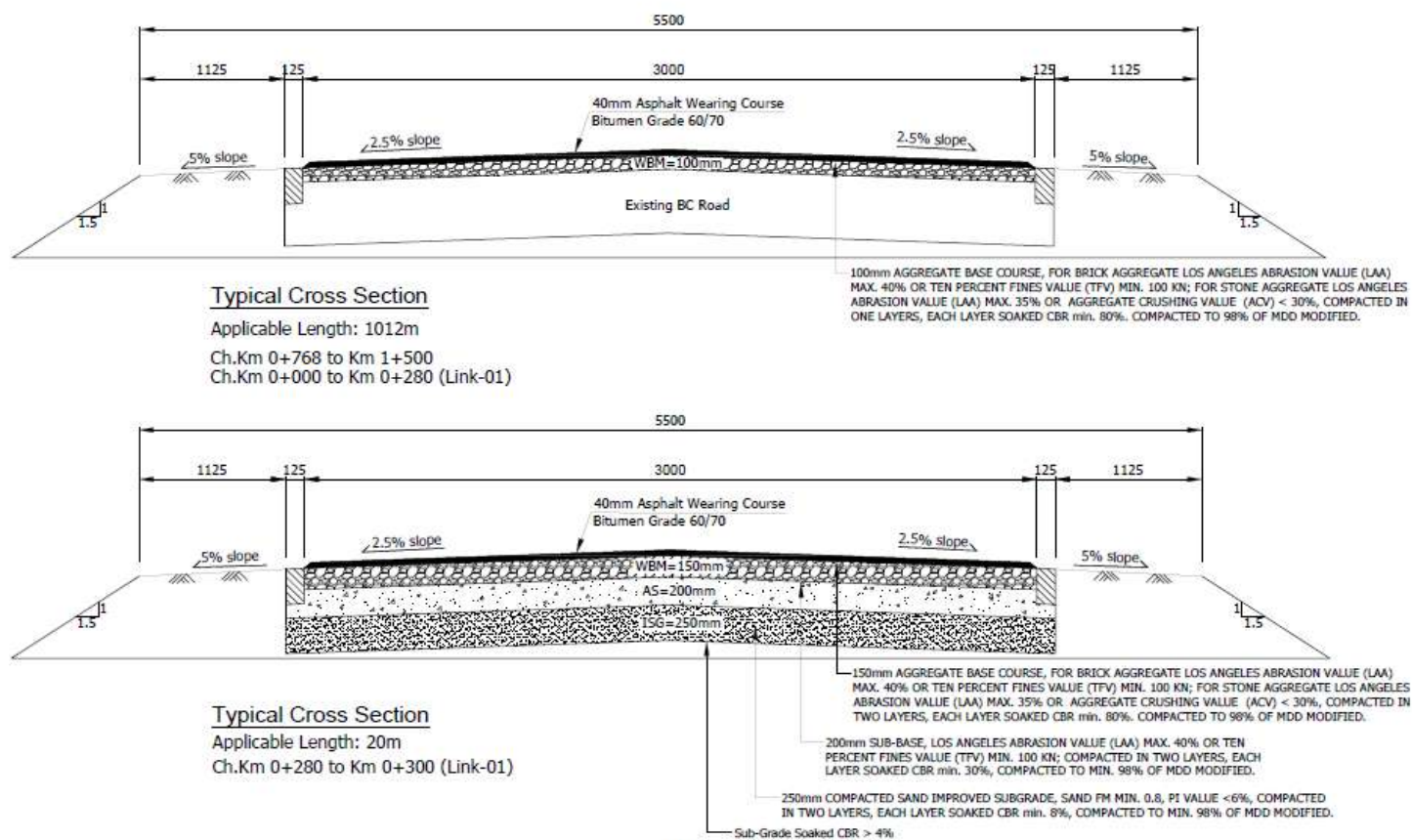


Figure 23: Typical Cross Section of the Road (Ch. 0+768 - 1+500 km and 0+280-0+300 kilometer; Link Road- 0+000-0+280 kilometer)

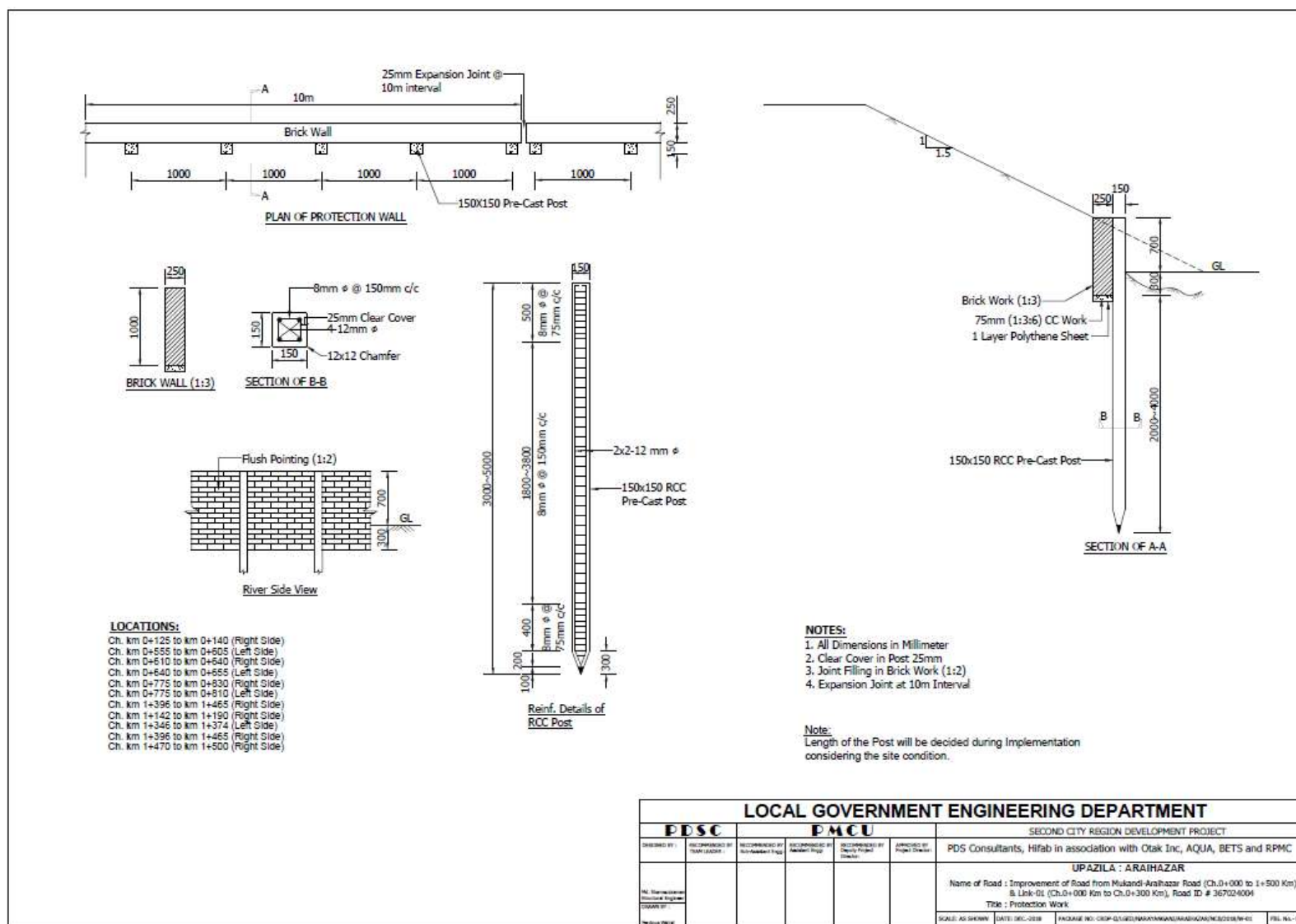


Note:

Considered Design Traffic 0-100 CVD and Subgrade CBR 4%-6%.
But Carriageway maintained as per existing width.

LOCAL GOVERNMENT ENGINEERING DEPARTMENT					
PDS	PMCU			SECOND CITY REGION DEVELOPMENT PROJECT	
DESIGNED BY :	APPROVED BY : TEAM LEADER:	RECOMMENDED BY: Sub-Main Road Engg.	RECOMMENDED BY: Arterial Engg.	APPROVED BY: Project Director:	PDS Consultants, Hifab in association with Otak Inc, AQUA, BETS and RPMC
PL: Main Roads Engineering Project Divisional Engineer				UPAZILA : ARAHAZAR	
				Name of Road : Improvement of Road from Mukundi-Aralhar Road (Ch.D+000 to +150 Km) & Link-01 (Ch.D+000 Km to Ch.D+300 Km), Road ID # 367024004	
				SCALE: AS SHOWN	(DATE: DEC -2018) PACKAGE NO.: CSPR-12-UGES-NARA-YANGANG-NARA3-DRAWING/NCR/2018/033/NH-63 PDS No.- 98

Figure 24: Typical Cross Section of Protection Work



IV. DESCRIPTION OF THE ENVIRONMENT

A. Physical Resources

77. **Location and Extent.** The proposed subproject is located in Araihaazar Upazila of Narayanganj District in the division of Dhaka, Bangladesh, and in between 23°40' and 23°53' north latitudes and in between 90°35' and 90°45' east longitudes. It is bounded by Narsingdi Sadar upazila on the north, Homna upazila on the south, Banchharampur upazila on the east and Rupganj and Sonargaon upazilas on the west. Total area of the Upazila is area 183.35 square kilometer (km²).

78. **Topography, Soil and Geology.** The area is generally flat and poorly drained. Its elevation is about 7 m above mean sea level and the area is nearly slope from west to east. Soils are somewhat porous allowing for some seepage of surface water into the soil, but in general, the area is subject to seasonal flooding.

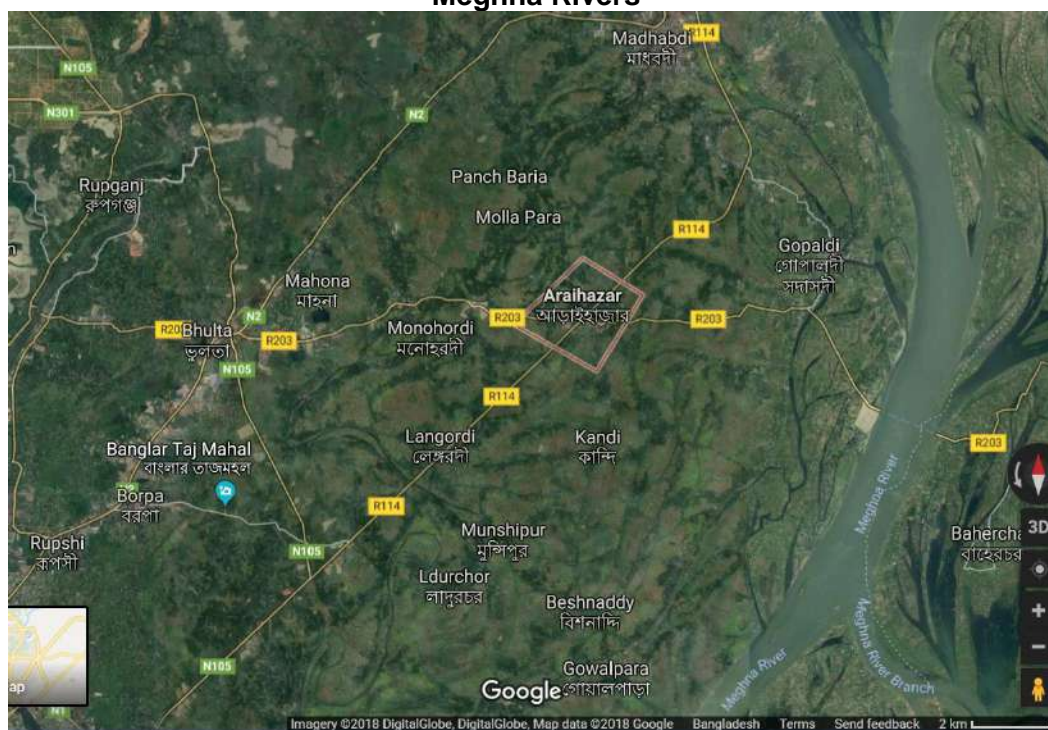
79. **Climate.** The temperature at Araihaazar ranges from 22° to 32°, and the monthly rainfall averages 15 millimeter (mm) during winter season and 430 mm during monsoon season.

80. **Air Quality.** No information is available on local air quality. Population density within the subproject area of the Upazila is high, although there are not many motor vehicles operating on the subproject roads and other roads within the upazila. It is expected that the subproject will not cause significant deterioration of air quality in the area. Close vegetation is observed in and around the subproject area. Prior to construction activities, subproject contractors will conduct air quality measurements as baseline. During construction, contractors will be required to conduct air quality measurements and ensure that the subproject does not cause deterioration of ambient air quality. This is included in the environmental management plan hereof.

81. **Noise Level.** No information is available on local noise level. Prior to construction activities, subproject contractors will conduct noise level measurements as baseline. During construction, contractors will be required to conduct noise level measurements and ensure that the subproject does not cause deterioration of noise level beyond the standards. This is included in the environmental management plan hereof.

82. **Surface Water.** Shitalakshya river and Meghna river are the major channels in the area, which are the ultimate discharge points of smaller streams within the Upazila. Shitalakshya river is more than 10 km to the west of the subproject area, while Meghna river is more than 6 km to the eastern side of subproject area. Canals and streams flowing through the Upazila area flow to either these two rivers. Figure 24 below shows the location of the subproject sites from these river system.

Figure 25. Map showing Location of Subproject Sites Relative to Shitalakshya and Meghna Rivers



Source: Google Earth.

83. **Groundwater.** Groundwater is abundant in Bangladesh. Water tables are generally shallow and aquifers are productive. The main aquifer, which is the source of water supply, is found at a depth of greater than 50 m.

B. Ecological Resources

1. Terrestrial Ecosystem

84. **Terrestrial flora.** The ecological setting is mostly settled countryside with typical homestead and roadside vegetation. There are no extensive forested areas in the near vicinity, yet tree cover from cultivated species could be high in some areas. There is no natural forest located alongside any of the subproject road of Araihasar Upazila. Only roadside trees are found which are largely maintained by the community or social forestry program. Social forestry program would mean any reforestation initiatives among government, non-government, institutional or people's organizations. Main crops grown inside the subproject area include paddy, jute, peanut, onion, garlic, chili and other vegetables.

85. **Terrestrial fauna.** The diversified habitat and ecosystem in the proposed area support various types of animals. Most of the amphibians, reptiles and mammals were identified by using books and description of the local people during the field survey by LGED, and these species are common in many areas of Bangladesh. The subproject area is considered a developed and modified urban setting. There are no endangered or critical species and critical habitats found during the field surveys.

2. Aquatic Ecology

86. **Aquatic flora.** Different types of aquatic flora species were recorded in the study areas. These are found in canals and ponds in the area and grow abundantly during monsoon season or when these canals and ponds are filled with rain water. The most abundant hydrophytes in the project area are Kochuripana (*Eichhornia crassipes*), Topapana (*Pistia stratiotes*), Khudipana (*Lemna minor*) Pata Jhajii (*Vallisneria spiralis*), Shapla (*Nymphaea* sp.), Kolmi (*Ipomoea aquatica*), Helenchaa (*Enhydra fluctuant*), and Duckweed (*Spiredella* sp.). Numerous algae (e.g., *Spirogyra* and *Scytonema*) and amphibian plant, Dhol kolmi (*Ipomoea fistulosa*) are also found in the road side water bodies. There are no endangered aquatic flora species found in water bodies in the subproject areas.

87. **Aquatic fauna.** There are species of fishes and shrimps found in project road area. The fishery grounds in the subproject area comprise of ponds, beels, rivers, flood lands, borrow pits, and canals. There are no endangered aquatic fauna species found in water bodies in the subproject areas. These water bodies are normally full during monsoon seasons, while some dry up during summer or dry seasons.

3. Economic Development

88. **Land Use.** Per rough estimates, the total agricultural land is approximately 15,000 hectares (ha), while fallow land is approximately 1,000 ha. In terms of cropping these agricultural lands, estimates are: single crop — 10%, double crop — 60%, and triple crop — 30%. Land under irrigation is 45%. As regards the ownership of agricultural land, estimates are: landowner — 45% and landless — 55%. Cultivable land per person is 0.15 ha.

89. **Industry and Agriculture.** There are few small and medium industries of different types operating in the upazila (e.g., rice mill, flour mill, jute mill, cotton mill, paper mill, hosiery industry, bakery, bidi factory etc.). There are also cottage industries operating in the area (e.g., goldsmith, blacksmith, weaving, wood work, embroidery etc.). As observed from field visit at proposed subproject site, no industries were found to encroach the ROW for the proposed development. Main crops grown in the area are paddy, wheat, potato, brinjal, patal, cauliflower, sugarcane and mula (radish). Kaun and sesame are now becoming rarely or hardly grown crops in the area.

90. **Infrastructure, Transport and Communications.** Existing infrastructure in Araihaazar upazila includes many roads that are poorly maintained, degraded in condition and often impassable for small vehicles. Relatively bigger or larger vehicles are able to traverse some of these roads but at very slow speeds. Forms of the existing roads and drains are as follows: 355.02 km paved, 251.29 km earthen, 0.35 km brick drain and 35 km natural drain. In terms of transport and movement, regular bus services are available in the upazila to travel to other areas of Bangladesh. Whereas, movements within the upazila are served by rickshaw, auto-rickshaw, easybike, maxi (laguna) and rickshaw van.

4. Social and Cultural Resources

91. **Demography.**¹³ The total population of Rupganj Upazila is 331,566 composed of 171,482 males and 160,084 females. Religious groups in the area are Muslim (319,854), Hindu (116,553), Buddhist (22), Christian (28) and others (9). It has 52,963 households with average household size is 7.1. The population density is 2,053 persons per km², Information obtained from the

¹³ Banglapedia. The National Encyclopedia of Bangladesh. [Araihaazar Upazila](#).

Upazila suggests that the main occupations of general people are agriculture 28.48%, non-agricultural laborer 8.29%, commerce 20.19%, transport and communication 4.84%, industry 15.13%, service 5.96%, construction 1.40%, religious service 0.26%, rent and remittance 3.44% and others 12.01%.

92. **Local Market and Bazar.** There are 34 hats and bazaar in the subproject Upazila; most noted of which are Gopaldi Bazar, Araihasar Bazar (formerly Kalibari), Kamrangir Char Bazar, Jangalia Bazar and Radhanagar Bazar. It is noteworthy to point out that Murapara bazar, Kaladi bazaar, and Handi market are partly or fully situated along the side of the proposed subproject road alignment (footnote 13).

93. **Health and Educational Facilities.** There are numerous health facilities, educational and religious institutions within the upazila: (i) health centers include one hospital, five satellite clinics, seven family planning clinics, four health and family welfare centers, seven union health centers, and one clinic; (ii) educational institutions include four colleges, two technical colleges, 24 secondary schools, 104 primary schools, and 51 madrasas; (iii) noted educational institutions include Araihasar Pilot School (1897), Satgram Government High School (1910), Duptara C.C High School (1912), Central Coronation High School (1912), Sadasardi High School (1913), and Gopaldi High School (1919); and religious institutions include 290 mosques, ten temples, and three tombs. Average literacy rate within the Upazila area is 37.4% (41.2% male and 33.4% female) (footnote 13).

94. **Water Supply and Sanitation.** There is no piped water supply system in the upazila. The sources of drinking area include tube-well (94.02%), tap (0.40%), pond (0.21%) and others (5.37%). Sanitation facilities are available in the form of improved sanitary latrines. However, many of the households still lack sanitary latrine facilities (footnote 13).

95. **Access to electricity.** All the unions of the upazila are under rural electrification network. However, only 60.90% of the households have access to electricity (footnote 13).

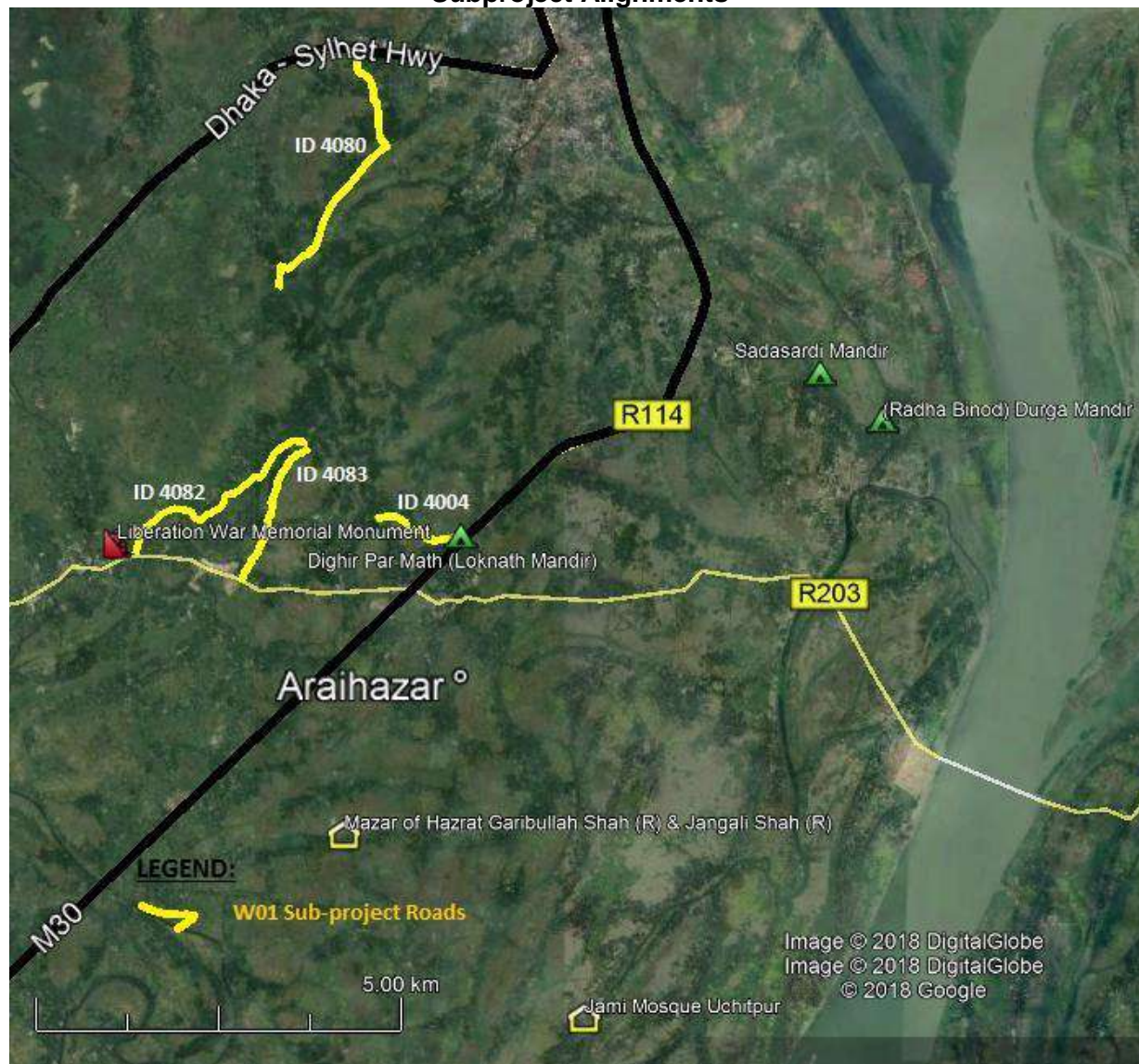
96. **Pollution and Road Safety.** People are concerned about increasing pollution in the subproject area as well as safety of people while crossing the roads. Industries within the subproject road were found discharging the untreated effluent to local drains, canals and water courses which may result in the contamination of the land area and water bodies. Accident is reported to take place now and then on the subproject road due to rough driving as well fast speed and non-availability of safe passage for crossing the road.

1. History, Culture and Tourism

97. The upazila area is also enriched with cultural heritage sites and structures such as the following: (i) two-storied building with 108 rooms (Sadasardi), (ii) mazars of Hazrat Garibullah Shah (R) and Jangali Shah (R) at Haizadi, (iii) colored glass decorated Durga Mandir, (iv) house of Zamindar Birendra Roy Chowdhury, (v) Dighipar Math (Araihasar), (vi) single-domed Jami Mosque (Uchitpur), and (vii) marks of the war of liberation (Memorial monument). These are playing a vital economic role in this Upazila. These archaeological/cultural heritage and relics are generally of local interest and tourist attraction only. None of these sites and structures are included in the list of UNESCO World Heritage Sites or protected monuments by the Bangladesh Department of Archaeology. None of these are located near or along the alignments of the subproject and will not be affected by the proposed roadway improvements. The nearest structure is already more than 300 m by straight line distance from the nearest subproject alignments. Sasardi is already about 5 km northeast of the Araihasar Upazila, while Haizadi and Uchitpur are

more than 4 km south of Araihasar Upazila. Based on actual field visits by PMCU in 2017 and 2018, no physical cultural resources are found in the corridor of impacts. Figure 25 below shows the nearest physical cultural resources and are more than 300 m from the road alignments.

Figure 26: Aerial Map Showing the Locations of Cultural Heritage Sites Relative to the Subproject Alignments



2. Socioeconomic Benefits from the Road Improvement Schemes

98. Expected outcomes after implementation of the schemes will be:
- (i) Increased property values and revenue income of the Upazila;
 - (ii) Improved environmental conditions and reduced environmental pollution risk;
 - (iii) Improved tourist potential, providing an enhanced business environment for local businesses and investment;
 - (iv) Increased job opportunities in small industries due to expansion of trade and commerce;
 - (v) Increased economic and financial opportunities;

- (vi) Creation of short-term employment opportunities in construction work during the period of implementation;
- (vii) Improved traffic management, public transport and sustainable environmental conditions; and
- (viii) Generation of employment opportunities.

99. **Summary of environmental features around the road alignments.** To understand the effect of the proposed of the subproject to receptors, information on some important environmental key features for all the four subproject roads have been collected and analyzed. From analysis, these roads reveal more or less similar pattern of environmental features around them. Table 16 summarizes these environmental features.

Table 16: Summary of Environmental Features around Road Alignments

Sl. No.	Environmental Features	Within 100 meter from Centerline of Road	Within 7 kilometer from Centerline of Road
1	Ecological		
a)	Presence of Wildlife Sanctuary/ National Park	No	No
b)	Reserved Forests	No	No
c)	Wetland/water bodies	Small ponds/ditches. None is protected	1 river (Meghna which is more than 6 km away) /ponds and ditches, but none is protected
d)	Migratory route for wild animals	No	No
e)	Migratory routes for birds	No	No
f)	Migratory routes for fishes	Yes (during rainy season)	Yes (during rainy season)
g)	Presence of Dolphin	No	No
h)	Tree/vegetation cover	Yes. Moderate trees and vegetation. No threatened or endemic tree.	Yes. Moderate trees and vegetation. No threatened or endemic tree.
i)	Birds Nesting	Yes. On trees along the sides of road alignments and trees within the 100 meter distance, birds may also nest.	Yes. On trees along the sides of road alignments and trees within the 7 km distance, birds may also nest.
2.	Archaeological Monuments	No	No
3.	Groundwater	Available at low depth, drinking water at about 50 m below ground.	Available at low depth, drinking water at about 50 m below ground.
4.	Land Use	Agricultural, Rural Settlement, Urban Settlement, Commercial, Industrial	Agricultural, Rural Settlement, Urban Settlement, Commercial, Industrial, Some Rural Community Forests (not protected forests).
5.	Physical Cultural structures and social	Road in some areas passes through few religious structures and/ or graveyard located near the road alignments. However, none of these will be affected.	Road passes through rural-urban and peri-urban areas. Few religious structures and/ or graveyard located near the road alignments.

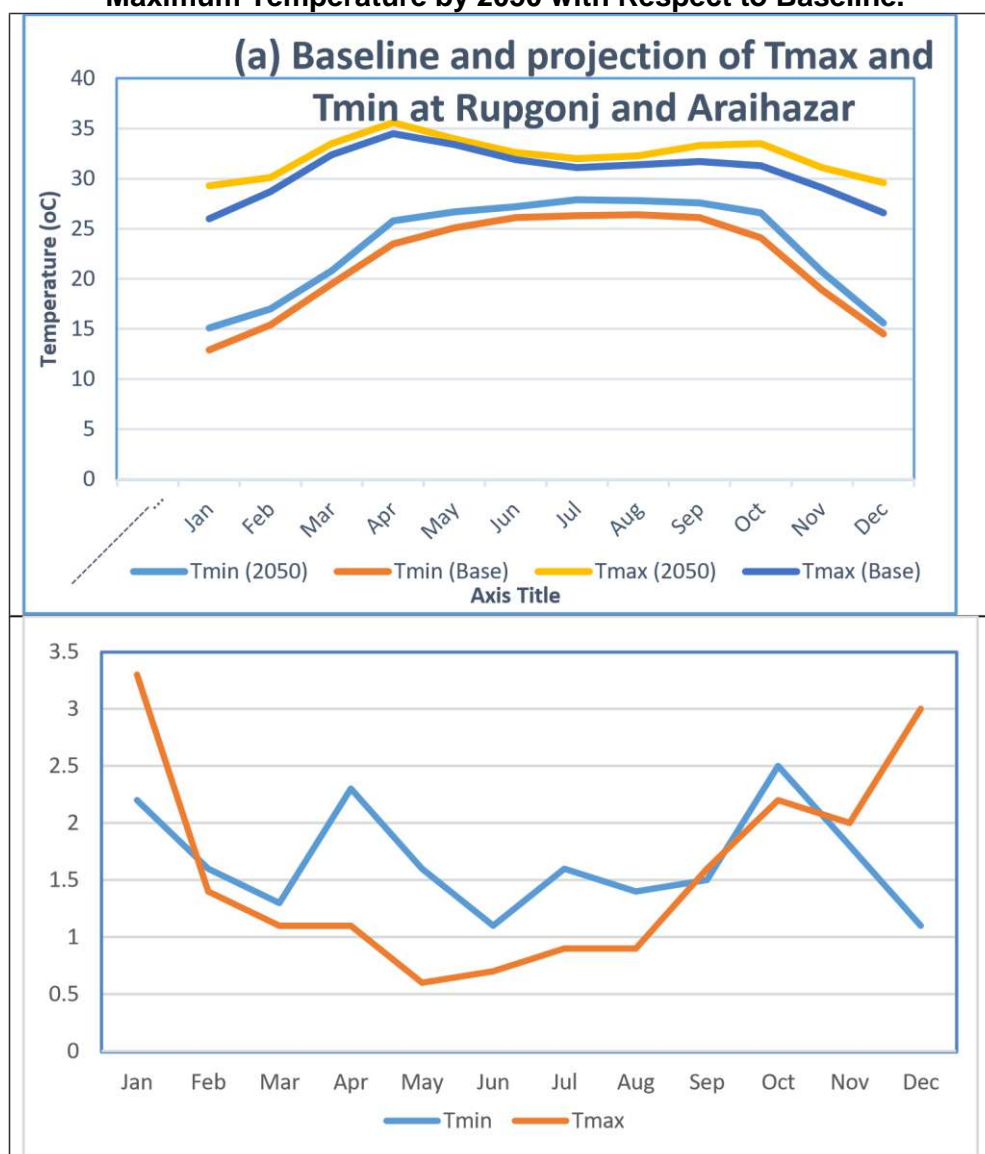
km = kilometer, m = meter.

Source: PMCU/LGED field surveys conducted in 2017 and 2018.

3. Baseline and Projected Climate

100. A climate change vulnerability and disaster risk assessment were conducted for the various subprojects under the project.¹⁴ Results of this assessment have been used to design the various subprojects, including the Araihaazar roads subprojects. The baseline climate and future projection at 2050 for minimum temperature (Tmin), maximum temperature (Tmax) and rainfall for Araihaazar for RCP 6.0 are shown in Figure 27, which demonstrate that the temperature is expected to increase in the future. The rainfall change is shown in Figure 28 while changes of both temperature and rainfall are shown in Table 17.

Figure 27: Temperature Baseline and Projection for 2050 (a) and Change of Minimum and Maximum Temperature by 2050 with Respect to Baseline.



¹⁴ LGED. 2017. Climate Change Vulnerability and Disaster Risk Assessment: Design Options for Dhaka City Region Roads Subprojects. CRDP-II.

Figure 28: Baseline and Projection for 2050 of Rainfall (a) and the Change of Rainfall in 2050 with Respect to the Baseline for Araihaazar and Rupganj

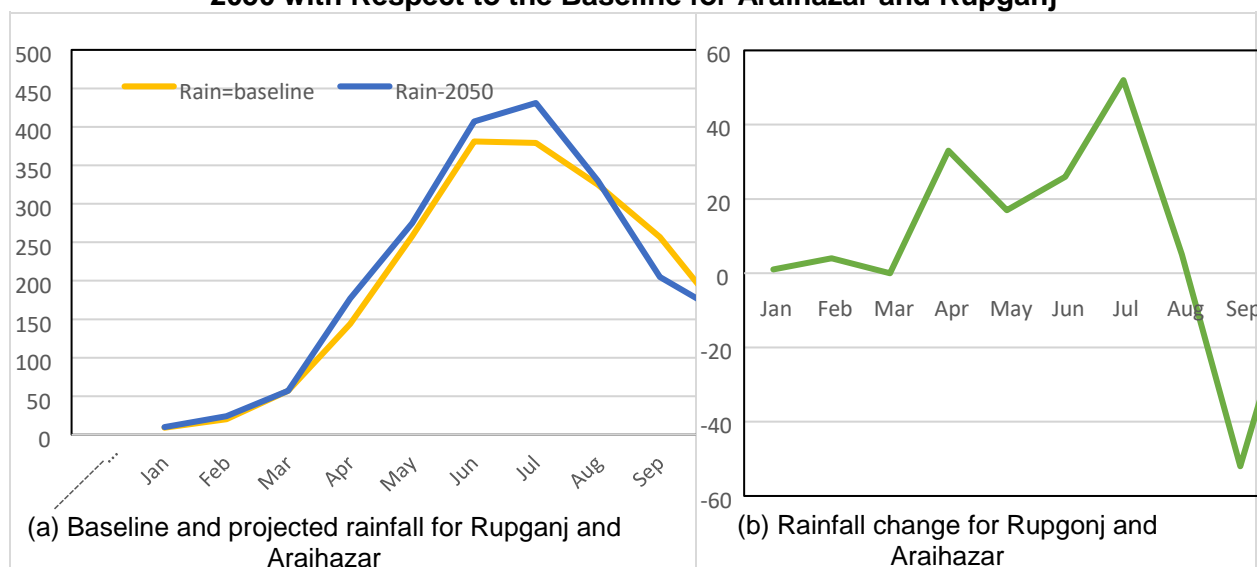


Table 17: Table showing Changes of Tmin and Tmax and Rainfall in Rupganj and Araihaazar

Month	Tmin (°C)	Tmax (°C)	Mean (°C)	Rainfall (mm)	Change of Rainfall (%)	Seasonal
Jan	2.2	3.3	2.75	1	11	0% (DJF)
Feb	1.6	1.4	1.5	4	20	
Mar	1.3	1.1	1.2	0	0	11% (MAM)
Apr	2.3	1.1	1.7	33	23	
May	1.6	0.6	1.1	17	7	
Jun	1.1	0.7	0.9	26	7	7 % (JJA)
Jul	1.6	0.9	1.25	52	14	
Aug	1.4	0.9	1.15	5	2	
Sep	1.5	1.6	1.55	-52	-20	-10% (SON)
Oct	2.5	2.2	2.35	1	1	
Nov	1.8	2	1.9	4	11	
Dec	1.1	3	2.05	-5	-100	

DJF = December, January and February, °C = degree Celsius, JJA = June, July and August, MAM = March, April and May, mm = millimeter, % = percent, SON = September, October and November, Tmax = maximum temperature, Tmin = minimum temperature.

101. For roads, the critical climate parameter is precipitation in terms of volume and intensity, and their impact on occurrences of flooding depending on location. In combination with geology and geography, a related variable is soil moisture as it affects road foundation stability.

102. Hot days temperature is also an important road design consideration, particularly for asphalt roads, due to its effect on stiffness of the pavement. The stiffness modulus of asphalt is affected by temperature. Migration/bleeding of liquid asphalt is a concern at sustained air temperatures above 32°C. For concrete roads, the range of temperature variation determines the proper width of joints, including the composition of the joint sealants.

103. For bridges, the critical design parameter derived from precipitation and catchment characteristics is flood level which determines the required vertical clearance of the bridge deck.

V. ASSESSMENT OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Compliance with Subproject Selection Criteria

104. The subproject was selected based on the selection criteria in the environmental assessment and review framework (EARF) of the project. Table 18 below is a summary of the assessment of compliance with the subproject selection criteria under the project.

Table 18: Compliance Matrix with Subproject Selection Criteria

Criteria	Remarks
1) Complies with all requirements of relevant national, state and local laws, rules and regulations.	Being complied on ongoing basis.
2) Complies with all requirements of ADB Safeguards Policy Statement (SPS) 2009, and follow procedures set down in the environmental assessment and review framework (EARF).	Being complied on ongoing basis.
3) Does not trigger environmental category A per ADB SPS. In particular, does not encroach any sensitive areas and/or critical habitats per definition of ADB SPS, and does not cause significant adverse environmental impacts that are irreversible, diverse, or unprecedented, which may affect an area larger than the sites or facilities subject to physical works.	Complied.
4) Does not include and/or involve any activities listed in ADB's Prohibited Investment Activities List (Appendix 5 of ADB SPS). These activities do not qualify for ADB's financing.	Complied.
5) Avoids any work in or near environmentally sensitive locations, including sites with national or international designation for nature conservation, cultural heritage, or any other reason.	Complied.
6) Does not result in destruction of or encroachment onto physical cultural resources such as archaeological monuments; heritage sites; and movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance.	Complied.
7) Alignments or project locations avoid or minimize, when avoidance is not possible, the cutting of trees. Include provisions for compensatory plantation at ten trees per every tree to be cut.	Complied. Included in the environmental management plan (EMP).
8) Reflects inputs from public consultation and disclosure for site selection.	Complied. Also, to be complied in future consultations. The

Criteria	Remarks
	initial environmental examination (IEE) provides for this criterion.
9) All the road works shall be designed to blend in with the environment.	Complied.
10) Does not lead to alteration of surface water hydrology of streams/waterways that may result in increased sediment load due to erosion from construction sites.	Complied. Included in the EMP.
11) Provides for appropriate protection/mitigation measures to address noise impacts on adjoining communities, especially sensitive receptors as schools/hospitals along the roads.	Complied. Included in the EMP.
12) Ensure requirements for drainage maintenance measures are incorporated into the operations and maintenance manual and suitable budget allowed for to ensure ongoing performance of measures.	Complied. Included in the EMP.
13) For subproject components that may affect natural streams or rivers, all comments and advice received from project management coordination unit (PMCU), project implementation unit (PIU), design engineers, and appropriate departments are incorporated into the planning, design and construction of the subprojects as far as practicable.	Being complied on ongoing basis.
14) Provides for appropriate protection/mitigation measures to address noise impacts on adjoining communities, especially sensitive receptors as schools/hospitals along the roads.	Complied. Included in the EMP.
15) Ensure requirements for drainage maintenance measures are incorporated into the operations and maintenance manual and suitable budget allowed for to ensure ongoing performance of measures.	Complied. Included in the EMP.
16) Ensures detailed designs and environmental safeguards conditions are included in the planning.	Complied. Included in the EMP.
17) Provides for (i) capacity building of PIU staff composting plant operation and maintenance, and (ii) market study on the users of compost to assess sustainability of the demand for such compost.	Complied. Included in the EMP.

B. Anticipated Impacts and Mitigation Measures - Planning, Location and Design Phase

105. **Impacts due to location.** These Impacts are associated with planning particularly on the site selection. They include impacts due to encroaching on sensitive areas and impacts on the people who might lose their homes or livelihoods due to the development of the proposed site. However, in the case of the road subproject, no significant impacts are anticipated since the road construction and/or rehabilitation works will be done on existing road alignments with ROW and located in built up areas. There will be no road widening works that will encroach any private property. The road shoulders or footpaths to be constructed and/or rehabilitated are also within existing ROW.

106. **Impacts due to Climate Change.** The impact of climate change is high for the road subproject. The design of the roads and other related infrastructures should consider future changes in climate patterns such as flooding due to extended monsoon seasons and increased level of precipitation, droughts, and increased global temperature, among others. More particularly for the subproject, the planning and design of the subprojects should consider the following:

- (i) Likely changes in the climatic conditions with respect to temperature, flooding, salinity, and acidity, including drainage aspects; and

- (ii) Likely impacts on road surfaces and runoff due to climate change-induced heavier and more erratic rainfall.

107. **Mitigation Measures.** The impacts of climate change will be mitigated upfront during the design and planning stage for the infrastructures. Among these measures are the following:

- (i) Due to climate change, the river water level will rise and as a result, the bridge clearance will be lower. Therefore, consideration of increase bridge height is required;
- (ii) The differences in water level between base and future time should be computed as it is needed to estimate the additional road embankment height required in making the roads safer against climate change-induced flooding;
- (iii) The proposed road area might have to drain a significant additional discharge due to climate change-induced higher rainfall during extreme events. Therefore, adequate number of drainage facilities along with comparatively larger openings should be considered in structure for the proposed road; and
- (iv) Maximum possible efforts have to be made for minimizing cutting of trees while designing widening option for the proposed road.

108. Apart from the above climate change considerations in the design of the subproject, the other impacts, issues, concerns and mitigation measures during the design phase are illustrated in Table 19 below.

Table 19: Issues, Concerns and Mitigation Measures During Design Phase

Project Activity	Potential Environmental Impacts	Proposed Mitigation Measures	Responsibility
Detailed design			
Incorporation of sloped areas in subproject design	Soil erosion and slope instability	<ul style="list-style-type: none"> • Incorporate measures and sites for handling excessive spoil materials • Incorporate drainage plan in final design 	Project management coordination unit (PMCU), preparation, design and supervision consultant (PDSC)
Incorporation of community health and safety measures in the design	Road accidents	<ul style="list-style-type: none"> • Ensure to include in the design the following: (i) road signages in critical areas or curves, (ii) speed limiters such as humps, (iii) barricades or similar structures in accident-prone areas, and (iv) pedestrian crossing lanes, among others. 	PMCU, PDSC
Location trees, utilities and other infrastructures before construction.	Disruption of utility services; False claims from people; Water quality changes due to construction. Interference with other utilities and other infrastructures, including heritage areas, if any, during construction	<ul style="list-style-type: none"> • Avoid alignments that will run over trees and utilities such as electric poles, etc. • Innovate and design footpaths that will avoid cutting of trees. • Provide budget for restoration/replacement of damaged utilities • Provide budget for tree planting as replacement activity for cut trees, if any. 	PMCU, PDSC

Project Activity	Potential Environmental Impacts	Proposed Mitigation Measures	Responsibility
		<ul style="list-style-type: none"> • Avoid placing alignment near heritage buildings and religious structures. • Photograph all sites within heritage areas to enable before and after comparison (note: all roads are to be reinstated to original character especially in heritage areas) • Ensure compliance with any Department of Archaeology rules during design. • If deemed required, consult structural engineers to determine the impact of vibration to all kinds of infrastructures adjacent to the road alignments. 	
Construction in the vicinity of residential areas	<p>Nuisance to nearby receptors.</p> <p>Impacts to qualities of ambient air, surface water, groundwater, and land.</p> <p>Impacts to health and safety of community and workers.</p>	<ul style="list-style-type: none"> • Ensure compliance with national or international standards on noise, ambient air and effluent, whichever are more stringent. • Ensure all bid and contract documents prepared and finalized have copy of the initial environmental examination (IEE) as attachment. 	PMCU, PDSC
Operation and maintenance (O&M) manual preparation	Impacts to health and safety of community.	<ul style="list-style-type: none"> • Prepare a comprehensive O&M manual to include periodic inspection and maintenance of roads, conduct of road repairs, etc. 	PMCU, PDSC
Site selection of sources of construction materials such as sand and gravels.	Extraction of materials can disrupt natural land contours and vegetation resulting in accelerated erosion; Disturbance in natural drainage patterns, ponding and water logging, and water pollution.	<ul style="list-style-type: none"> • Procure construction materials such as sand, gravels, or aggregates from government-authorized dealers only. • If quarrying is to be the source, ensure to conduct at sites authorized by the government such as the Bangladesh Water Resources Development Board for sand quarrying. 	PMCU, PDSC
Spoil management and disposal	Inappropriate disposal of spoils will cause nuisances to affected properties, including siltation of canals.	<ul style="list-style-type: none"> • Identify designated disposal sites approved by the upazila. • A spoil management plan will be developed. 	PMCU, PDSC
Construction camps	Inappropriate location for construction camps will impact the general welfare and	<ul style="list-style-type: none"> • Identify construction camp sites that are strategically located relative to the work sites. 	PMCU, PDSC

Project Activity	Potential Environmental Impacts	Proposed Mitigation Measures	Responsibility
	health and safety of the workers.	<ul style="list-style-type: none"> • Ensure these camp sites can be easily provided with the basic amenities for the workers. 	

IEE = initial environmental examination, O&M = operation and maintenance, PDSC = preparation, design and supervision consultant, PMCU = Project management and coordination unit, PIU = project implementation unit.

C. Anticipated Impacts and Mitigation Measures - Construction Phase

109. In the case of this subproject, environmental impacts during construction phase will not be severe because: (i) most of the component works are relatively small and involve straightforward construction, so impacts will be mainly localized and not greatly significant; (ii) most of the predicted impacts are associated with the construction process, and are produced because of the invasive nature of excavation activities and earth movements; and (iii) being located in the built-up area of the rural and urban areas, will not cause direct impact on biodiversity values.

1. Construction Method

110. The civil works for road construction and/or rehabilitation include earth work excavation. Earth work excavation will be undertaken using various heavy equipment such as bulldozers, backhoes, dump trucks, compactors, etc. Excavation and construction activities will be done through a segmentation or chainage-wise planning with around 100 m – 200 m per segment or stretch. This will ensure that impacts can be easily managed by the contractor.

111. **Non-Compliance with Environmental Legislation.** This issue will arise when there is a lack of awareness among subproject staff and management of environmental safeguard requirements, compliance with the requirements, conditions specified in the IEE report, approval status, and consent.

112. Mitigation measures include (i) capacity strengthening of the PMCU Environmental Officer and the counterpart PIU focal persons on environmental safeguards; and (ii) ensuring that necessary permits are obtained.

2. Impact on Physical Resources

113. **Topography, Soils and Geology.** Subproject activities are not large enough to affect these features so, there will be no impacts.

114. **Sources of Materials.** Significant amount of gravel, sand and aggregate, will be required for this subproject. The contractor will be required to:

- (i) Prepare Aggregates Management Plan as part of the SEMP;
- (ii) Source aggregates only from entities with environmental clearances and license;
- (iii) Use quarry sites and sources permitted by relevant government agencies only, such as the Bangladesh Water Resources Development Board for sand quarrying;
- (iv) No new quarry sites shall be used for the subproject;
- (v) Verify suitability of all material sources and obtain approval of implementing agency; and
- (vi) Document all sources of materials and include in the monthly reporting to the PIU.

115. **Air Quality.** While most construction works will be conducted during the dry season, there is potential for creating dust from (i) excavation of dry soil and backfilling; (ii) transport, loading and unloading of natural aggregates; (iii) movement of construction-associated vehicles; (iv) on-site rock crushing and concrete mixing; (v) emissions from construction vehicles, equipment, and machinery used for excavation and construction, which may contain pollutants such as carbon monoxide, sulphur oxides, particulate matter, nitrous oxides, and hydrocarbons; and (vi) burning of firewood for cooking and heating in work and labor camps.

116. To mitigate the impacts, contractors will be required to:

- (i) follow World Bank's Environmental Health and Safety (EHS) Guidelines on Construction and Decommissioning Activities;¹⁵
- (ii) confine earthworks according to excavation segmentation plan that should be part of site-specific environmental management plan (SEMP);
- (iii) prepare and implement a dust management plan that should be part of the SEMP;
- (iv) consult with PIU on the designated areas for stockpiling of sand, gravel, and other construction materials (ideally about 500 m from residential areas);
- (v) bring construction materials (aggregates, sand, etc.) to the construction site as and when required to avoid heavy stockpiling at the sites;
- (vi) damp down with water dry exposed surfaces and stockpiles of aggregates at least twice daily, or as necessary;
- (vii) if re-surfacing of disturbed roads cannot be done immediately, spread crushed gravel over backfilled surfaces;
- (viii) during demolition, water exterior surfaces, unpaved ground in the immediate vicinity and demolition debris;
- (ix) place signage at active work sites in populated areas;
- (x) require trucks delivering aggregates and cement to have tarpaulin cover;
- (xi) clean wheels and undercarriage of vehicles prior to leaving construction sites;
- (xii) limit speed of construction vehicles on access roads and work sites to a maximum of 30 km/h;
- (xiii) prohibit burning firewood in work and labor camps (promote liquified petroleum gas for cooking purposes and electric heater for heating purposes);
- (xiv) use vehicles that have government-issued permits and registrations; and
- (xv) prohibit open burning of solid waste.

117. **Noise Levels.** Noise-emitting construction activities include earthworks, concrete mixing, demolition works, movement and operation of construction vehicles and equipment, and loading and unloading of coarse aggregates. The significance of noise impact will be higher in areas where noise-sensitive institutions such as health care and educational facilities are situated. Noise levels should not exceed the national standards for noise or WHO noise level guidelines, whichever is more stringent, or result in increase in background noise level of 3 decibels at the nearest receptor location off-site.¹⁶ The comparative illustration of national standards versus WHO guidelines is in

118. Table 4 of Section II.

119. To mitigate the impacts, contractors will be required to:

¹⁵ IFC World Bank Group. 2007. [Environmental, Health, and Safety \(EHS\) Guidelines – General EHS Guidelines: Construction and Decommissioning](#).

¹⁶ IFC World Bank Group. 2007. [Environmental, Health and Safety \(EHS\) Guidelines – General EHS Guidelines: Environmental – Noise Management](#).

- (i) follow World Bank's EHS Guidelines on Construction and Decommissioning Activities (footnote 15);
- (ii) if applicable to subproject alignment, prepare and implement a noise and vibration management plan that should be part of the SEMP;
- (iii) provide prior information to the local public, including institutions such as schools and hospitals, about the work schedule;
- (iv) use equipment that emits the least noise, well-maintained and with efficient mufflers. Install silencers if necessary and practical;
- (v) restrict noisy activities to day time;
- (vi) avoid use of noisy equipment or doing noisy works at night time;
- (vii) limit engine idling to a maximum of one minute;
- (viii) spread out the schedule of material, spoil and waste transport;
- (ix) minimize drop heights when loading and unloading coarse aggregates; and
- (x) not use horns unless it is necessary to warn other road users or animals of a vehicle's approach.

120. **Surface Water Quality.** Some sections of the road alignments are located along or cross water bodies, exposing these water bodies to risks of pollution caused by: (i) poorly managed construction sediments, and waste materials; (ii) poor sanitation practices of construction workers; and (iii) improper storage of petroleum products or chemicals used during construction such as fuel, oil and lubricants. Although construction works will be scheduled during dry season, any unavoidable excavation or construction works during monsoon season will wash down these pollutants to the water bodies.

121. To mitigate these impacts, the contractor will be required to:

- (i) follow World Bank's EHS Guidelines on Construction and Decommissioning Activities (footnote 15);
- (ii) dispose excess spoils per the Spoil Management Plan attached in Appendix 5;
- (iii) locate temporary storage areas on flat grounds and away from main surface drainage routes (ideally at least 100 m from surface water);
- (iv) shield temporary storage areas with sandbags;
- (v) provide adequate water supply and sanitation facilities at work sites;
- (vi) provide impervious bunded areas with 110% volume for storage of petroleum products used during construction, such as fuel, oils, and lubricants;
- (vii) provide orientation and training to assigned workers on the correct handling of petroleum-based products, clean-up of equipment, and response measures in case spills or emergencies using a well prepared emergency response plan; and
- (viii) ensure no refueling within 100 m from surface water.

122. For management and final disposal of solid wastes following mitigation, contractors will be required to apply the follow-up measures such as:

- (i) follow World Bank's EHS Guidelines on Construction and Decommissioning Activities (footnote 15);
- (ii) collection of recyclable solid wastes and supply to scrap vendors;
- (iii) ensure all the camp wastes and construction wastes are placed in the designated waste collection pits (lined to ensure no seepage of leachate) away from receiving water;

- (iv) establishment of separate bunded and lined areas with 110% volume for the storage of all the toxic material wastes, including batteries, oil filters, mobile, burnt oils, etc. at the construction site; and
- (v) consultation with PIU on the proper disposal of all residual wastes.

123. **Groundwater.** Subproject activities do not interfere with groundwater regime. No groundwater abstraction is proposed, and all activities are limited on land surface activities. Groundwater quality will not be impacted by the subproject.

124. However, as a precautionary measure, the mitigation measures for avoiding seepage of pollutants to the groundwater will be in place. Contractors will be required to:

- (i) follow World Bank's EHS Guidelines on Construction and Decommissioning Activities (footnote 15);
- (ii) provide impervious bunded areas with 110% volume for storage of petroleum products used during construction, such as fuel, oils, and lubricants. This will ensure these chemicals will not seep into the ground and eventually affecting groundwater quality; and
- (iii) no toilets shall be put up within 500 m from groundwater wells, if any.

125. **Landscape and Aesthetics.** The construction work is likely to generate considerable quantities of waste soil. Indiscriminate disposal of the soil and waste, excess construction material, concrete, packing materials, containers, lubricants and oils may affect the landscape and aesthetics of local environment.

126. These impacts are negative but short-term and reversible by mitigation measures. As mitigation measures, contractors will be required to:

- (i) dispose excess spoils per the Spoil Management Plan attached in Appendix 5;
- (ii) avoid stockpiling of excess excavated soils as far as possible;
- (iii) avoid disposal of any debris and waste soils in or near water bodies/rivers;
- (iv) coordinate with PIU for beneficial uses of excess excavated soils or immediately dispose to designated areas;
- (v) recover used oil and lubricants and reuse or remove from the sites;
- (vi) manage solid waste according to the following preference hierarchy: reuse, recycling and disposal to designated areas; and
- (vii) remove all wreckage, rubbish, or temporary structures which are no longer required;

127. **Impact on Ecological Resources.** Subproject sites are located within the town area. There is no biodiversity or natural habitat in these sites. As such, no impacts on ecological resources is envisaged.

128. **Impacts on Terrestrial Ecology.** Haphazard site clearing, parking, and movement of construction vehicles and equipment stockpiling, will result in disturbance to the land in the subproject area. However, the subproject area does not include any forest, so the impacts to flora and fauna will be minimal. For trees found along the alignments that will be used for footpaths or drains, the design will ensure that these trees will not be cut.

129. To mitigate these impacts, contractors will be required to:

- (i) avoid, or minimize when avoidance is not possible, tree cutting;
- (ii) for any tree cut, conduct replacement planting at a ratio of 1:10 consistent with the approved EARF for the project and social forestry program of LGED (see Appendix 6 for LGED Tree Plantation Program);
- (iii) protect giant trees and locally-important trees (for religious reasons), if any, during implementation;
- (iv) prevent workers or any other person from removing and damaging any flora and fauna found in the subproject sites; and
- (v) prohibit employees and workers from poaching animals and cutting of trees for firewood at the subproject sites or their vicinities.

130. **Impacts on Aquatic Ecology.** Some of the subproject sites are near or adjacent to ponds of khals (canals) that have been formed as water bodies and serve as catchment of rainwater during monsoon season. Through the years, these ponds and khals are utilized as fish ponds of the local communities. All aquatic animals in these ponds are not protected species and are grown for livelihood and income purposes by the local communities. Nevertheless, the construction of the subproject may affect these ponds due to siltation and therefore may impact the quality of the water and eventually the productivity and harvest of these aquatic resources.

131. To mitigate this impact, contractors will be required to:

- (i) provide temporary protection at sections adjacent or near ponds or khals to avoid sliding of soils;
- (ii) store spoils away from these ponds to avoid being washed down the ponds or khals (ideally at least 100 m from the surface water); and
- (iii) not undertake construction works near these sites during the spawning and breeding period between June and September.

132. **Impacts to traffic flow.** During construction, few disturbances will occur. Mitigation measures include the preparation and implementation of a traffic management plan in coordination with local authorities and PIU. The traffic management plan shall include the following: (i) installation of clear signages; (ii) barricades; (iii) lightings at night; and (iv) markers to direct traffic movement in sites, among others.

133. **Impacts on physical cultural resources.** The subproject will not encroach into or run over any physical cultural resources. Strip maps showing alignments with physical cultural resources, specifically religious establishment, are shown in Appendix 7. As well, the subproject area is not a potential archaeological area and therefore no impact is envisaged. However, as a precautionary approach, the contractor will be required to:

- (i) strictly follow the protocol by coordinating immediately with PIU and Bangladesh Department of Archaeology for any suspicion of chance finds during excavation works;
- (ii) stop work immediately to allow further investigation if any finds are suspected; and
- (iii) request authorized person from the Bangladesh Department of Archaeology to observe when excavation resumes for the identification of the potential chance find, and comply with further instructions.

134. **Impacts on the socioeconomic, environment and resources.** The impacts will result from excavation works, stockpiling, the operation of construction vehicles and equipment, and accidental damage to utilities (e.g., power supply poles, open drains, and water taps or hoses).

The potential impacts include disturbance to economic activities, particularly to the businesses operating along the alignments of construction works.

135. To mitigate these impacts, the contractor will be required to:

- (i) prepare a traffic management plan in collaboration with local authorities;
- (ii) where traffic congestion will likely occur, place traffic flagmen during working hours;
- (iii) avoid full road closures by applying section-wise and/or chainage-wise approach during excavation, concreting and/or curing periods;
- (iv) if full road closure is not possible especially on very narrow roads, ensure that alternate routes are identified and that affected residents and establishments are informed prior to conducting the construction activities;
- (v) provide appropriate compensation to qualified affected people or businesses per approved resettlement plan for the subproject;
- (vi) manage stockpile;
- (vii) manage pumped water from excavations either to drains or drums for later use;
- (viii) relocate the affected power supply poles, and
- (ix) advise the concerned authority during accidental damage to utilities.

136. **Community health and safety hazards.** Communities will be moderately exposed to threats due to impacts on air and water quality, ambient noise level; mobility of people such as the children and elderly, goods, and services; accesses to properties, economic activities, and social services; service disruptions, etc. Construction workers may potentially bring communicable diseases in the community.

137. To mitigate these impacts, the contractor will be required to implement its approved SEMP, which should include a community health and safety plan following international best practices on community health and safety such as those in Section 4.3 of World Bank EHS Guidelines on Construction and Decommissioning Activities (footnote 15). As a minimum and whichever is applicable, the community health and safety plan shall ensure the following:

- (i) implement risk management strategies to protect the community from physical, chemical, or other hazards associated with sites under construction and decommissioning;
- (ii) restricting access to the site, through a combination of institutional and administrative controls, with a focus on high risk structures or areas depending on site-specific situations, including fencing, signage, and communication of risks to the local community;
- (iii) removing hazardous conditions on construction sites that cannot be controlled affectively with site access restrictions, such as covering openings to small confined spaces, ensuring means of escape for larger openings such as trenches or excavations, or locked storage of hazardous materials; and
- (iv) implement measure to prevent proliferation of vectors of diseases at work sites;
- (v) adequate space and lighting, temporary fences, shining barriers and signage at active work sites;
- (vi) contractor's preparedness in emergency response;
- (vii) adequate dissemination of GRM and contractor's observance and implementation of GRM; and
- (viii) upon availability, local people should be given an opportunity for work in the subproject activities.

138. **Occupational health and safety hazards.** Workers will be exposed to the crosscutting threats of the impacts above during construction. Inadequate supply of safe and potable water and inadequate sanitation facilities; poor sanitation practices on site; poor housing conditions; the handling and operation of construction equipment; handling of hazardous substances; exposure to extreme weather and non-observance of health and safety measures pose additional threats to the health and safety of construction workers. Construction workers may be potentially exposed to communicable and transmittable diseases in the community and the workforce.

139. To mitigate these impacts, contractors will be required to implement its approved SEMP, which should include an occupational health and safety plan following international best practices on occupational health and safety such as those in Section 4.2 of World Bank EHS Guidelines on Construction and Decommissioning Activities (footnote15). As minimum and whichever are applicable, the occupational health and safety plan shall ensure the following:

- (i) Communication and Training
 - (a) Training of all workers on occupational health and safety prior to construction works;
 - (b) Conduct of orientation to visitors on health and safety procedures at work sites;
 - (c) Signages strategically installed to identify all areas at work sites, including hazard or danger areas;
 - (d) Proper labeling of equipment and containers at construction and storage sites; and
 - (e) Suitable arrangements to cater for emergencies, including: first aid equipment; personnel trained to administer first aid; communication with, and transport to, the nearest hospital with an accident / emergency department; monitoring equipment; rescue equipment; firefighting equipment; and communication with nearest fire brigade station;
- (ii) Physical Hazards
 - (a) Use of personal protective equipment by all workers such as earplugs, safety shoes, hard hats, masks, goggles, etc. as applicable, and ensure these are used properly;
 - (b) Avoidance of slips and falls through good house-keeping practices, such as the sorting and placing loose construction materials or demolition debris in established areas away from foot paths, cleaning up excessive waste debris and liquid spills regularly, locating electrical cords and ropes in common areas and marked corridors, and use of slip retardant footwear;
 - (c) Use of bracing or trench shoring on deep excavation works;
 - (d) Adequate lighting in dark working areas and areas with night works;
 - (e) Rotating and moving equipment inspected and tested prior to use during construction works. These shall be parked at designated areas and operated by qualified and trained operators only;
 - (f) Specific site traffic rules and routes in place and known to all personnel, workers, drivers, and equipment operators; and
 - (g) Use of air pollution source equipment and vehicles that are well maintained and with valid permits;
- (iii) General Facility Design and Operation
 - (a) Regular checking of integrity of workplace structures to avoid collapse or failure;

- (b) Ensuring workplace can withstand severe weather conditions;
- (c) Enough work spaces available for workers, including exit routes during emergencies;
- (d) Fire precautions and firefighting equipment installed;
- (e) First aid stations and kits are available. Trained personnel should be available at all times who can provide first aid measures to victims of accidents;
- (f) Secured storage areas for chemicals and other hazardous and flammable substances are installed and ensure access is limited to authorized personnel only;
- (g) Good working environment temperature maintained;
- (h) Worker camps and work sites provided with housekeeping facilities, such as separate toilets for male and female workers, drinking water supply, wash and bathing water, rest areas, and other lavatory and worker welfare facilities; and
- (i) Maintain records and make reports concerning health, safety and welfare of persons, and damage to property. Take remedial action to prevent a recurrence of any accidents that may occur.

D. Anticipated Impacts and Mitigation Measures – Operation and Maintenance Phase

140. **Impacts to community health and safety.** Once in operation, the improved roads may result to elevated noise level and air emissions from increased vehicular traffic. Increase in carbon monoxide, sulphur oxides, particulate matter, nitrous oxides, and hydrocarbons in the air is expected. The construction and rehabilitation of the roads will give way to much faster vehicle speeds which could endanger people, especially the children and elderly persons, and households along the road alignments. Damage to the roads may also cause accidents to passing vehicles and may inflict harm to the local people.

141. To mitigate these impacts, the PIU will be required to:

- (i) Conduct regular inspection of the roads to check for damages, and undertake rehabilitation measures for any damages found;
- (ii) Inspect and maintain the integrity of road barriers, especially at critical curves or locations that are prone to vehicular accidents;
- (iii) Inspect and maintain speed limiters such as humps installed on road sections near residential areas, schools, and religious establishments;
- (iv) Inspect and maintain all road signages, including appropriate warning signages at silent zones, and ensure that these are reflectorized and visible even during night time;
- (v) Ensure pedestrian crossings and other safety measures to protect children and elderly persons, are maintained; and
- (vi) Continuing driver education/awareness campaigns and road safety campaigns in schools.

VI. CONSULTATION, INFORMATION DISCLOSURE, AND GRIEVANCE REDRESS MECHANISM

A. Consultation

142. Stakeholder consultation and participation was an essential process during subproject preparation. The process of engaging stakeholders and affected people involved key informant

interviews, on-site discussions and random field interviews of stakeholders.

143. **Preliminary Consultation.** Public consultations were conducted in January 2018 and March 2018 which were attended by various stakeholders. The summary of consultation meeting is attached as Appendix 8. The following are some of the concerns discussed:

- (i) Local people will support the project activities;
- (ii) The main issue arising from the consultation is that the people of this area suffer huge traffic congestion due to movement of heavy container truck. They cannot easily move to the school, hospital, and working places from their residences due to congestion. Hence, the people will benefit from the subproject, especially those who are residing alongside the roads;
- (iii) The area is dominated by businesses and is about 70%. The people in this area depends largely on these businesses, while the rest on services and agricultural cultivations;
- (iv) During the construction period short term, the consultees believe that community activities will be affected. However, the PIU explained that the project will ensure measures shall be put in place to avoid any negative impact to the community;
- (v) It was emphasized that no resettlement and land acquisition will be required for the project. However, compensations will be provided to affected persons who will be temporarily disrupted of their businesses during construction;
- (vi) It was confirmed with the local stakeholders that there is no protected areas in and around the project areas;
- (vii) The project will never impact on natural water body and not contaminate the soil resources. It was explained that the project will implement appropriate mitigation measures to ensure the natural water bodies in the area will not be negatively impacted; and
- (viii) The participants assured that they welcome the project, and will support/cooperate in all stages of the project works.

144. **Future consultations during final detailed design stage.** The stakeholder consultations during the final detailed design stage will continue to discuss about the subproject, including the implementation of the EMP and SEMP developed for the subproject. PMCU, PIU and PDSC will ensure that consultations will be conducted as meaningful per definition of ADB SPS (footnote 6). Araihaazar PIU will ensure that these consultations include participation of the representatives of institutional establishments along the subproject road alignments such as schools, hospitals, and religious establishments and mosques. These religious establishments or mosques are identified in Appendix 7.

B. Information Disclosure

145. Information shall be disclosed through public consultation and more formally by making documents and other materials available in a form and at a location in which they can be easily accessed by stakeholders. This normally involves making draft reports available for the public in the subproject locations and providing a mechanism for the receipt of comments, and making documents available more widely by lodging them on ADB and LGED websites. LGED through the PMCU will submit to ADB the following documents for disclosure on ADB's website:¹⁷

¹⁷ Per ADB SPS, 2009, prior to disclosure on ADB website, ADB reviews the "borrower's/client's social and environmental assessment and plans to ensure that safeguard measures are in place to avoid, wherever possible, and minimize, mitigate, and compensate for adverse social and environmental impacts in compliance with ADB's

- (i) the final IEE report;
- (ii) new or updated IEE reports and corrective action plan prepared during project implementation, if any; and
- (iii) semi-annual environmental monitoring reports.

146. PMCU will provide relevant environmental information, including information from the relevant documents in a timely manner, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. For illiterate people, other suitable communication methods will be used.

147. For the benefit of the community, the summary of the IEE will be translated in Bangla and made available at: (i) office of PMCU; and (ii) offices of the Araihaazar PIU. Hard copies of the IEE will be available in the PMCU and Araihaazar PIU, and accessible to citizens as a means of disclosing the document and at the same time creating wider public awareness. On demand, the person seeking information can obtain a hard copy of the complete IEE document at the cost of photocopy from the offices of the PMCU or Araihaazar PIU, on a written request and payment for the same to the Project Director. Electronic version of the IEE will be placed in the official website of LGED after approval of the documents by Government and clearance from ADB. PMCU will issue notification on the disclosure mechanism in local newspapers, ahead of the initiation of implementation of the project, providing information on the project, as well as the start dates, etc. The notice will be issued by the PMCU and Araihaazar PIU in local newspapers one month ahead of the implementation works. This will create awareness of the project implementation among the public. PMCU and Araihaazar PIU will consider other additional means of information disclosure depending on practicability, such as the distribution of posters to libraries within the locality to mass campaign the basic tenets of the IEE.

C. Grievance Redress Mechanism

148. The project will adopt the grievance redress mechanism (GRM) outline of the first CRDP. The GRM shall be set up to register grievances of the people regarding technical, social and environmental aspects. Also, the GRM welcomes all kinds of technical and safeguards-related queries, comments, suggestions and complaints from anyone. The process will be designed to be transparent, gender responsive, culturally appropriate and commensurate to the risks and adverse impacts of the project, as well as readily accessible to all segments of the affected people. The project GRM will not supersede any legal government grievance procedures.

149. Affected people are to be informed about the mechanism through information caravan and orientation in the community to be conducted by the project officers and staff, printing of pamphlets and brochures, media and public outlets. To ensure wider coverage, complaints or grievances can be reported through but not limited to: letters, e-mails, text messages, verbal narration from walk-in complainants, phone calls, fax, online grievance registration form (in local dialects) through the project website, installation of Grievance Intake Box at the project area and other mode of filing that the affected people have access to. For those affected people who cannot read and write, a community leader/volunteer will be identified in every project area. The community leader/volunteer will serve as the focal person who will assist the affected people in filing the complaints. This participatory process shall ensure that all views of the people are adequately reviewed and suitably incorporated in the design and implementation process. The GRM will be implemented in three levels. See Figure 28 for the outline.

150. **First Level.** The first level and most accessible and immediate venue for the fastest resolve of grievances is the PIU, chiefly through the environment and/or social safeguard officers and project manager (or equivalent), with assistance from the environmental and social safeguard specialists of the preparation, design and supervision consultant (PDSC). The contact phone number will be posted in the project areas and at PMU and PIU websites and notice boards. Grievances will be resolved through continuous interactions with affected persons and the PIU will answer queries and resolve grievances regarding various issues including EMP implementation, land acquisition, structures acquisition, livelihood impacts, entitlements, and assistance. Corrective measures will be undertaken at the field-level itself within five days and feedback provided to the complainant on actions taken for resolution. All grievances will be documented with full information of the person and issue. A sample grievance form that may be used is in Appendix 9. The suggested format for record-keeping of grievance is in Appendix 10.

151. **Second Level.** Should the grievance remain unresolved, the PIU project manager (or equivalent), will activate the second level of the GRM by referring the issue (with written documentation) to the local grievance redress committee (GRC) of the *pourashava* or city corporation, who will, based on review of the grievances, address them in consultation with the safeguards officers of the PIU and PMCU, and affected persons. A hearing will be called, if necessary, where the affected person can present his/her concern/issues. The process will promote conflict resolution through mediation. The PIU project manager will be responsible for processing and placing all papers before the GRC, recording decisions, issuing minutes of the meetings, providing feedback to complainants and taking follow up actions so that formal orders are issued and decisions are carried out. The local GRC will consist of the following persons: (i) chief executive officer or secretary of the *pourashava* or city corporation (GRC Chair); (ii) representative of the mayor of the *pourashava* or city corporation; (iii) representative of the affected persons; (iv) official of the land registry department; (v) official of the DOE divisional office; (vi) town planner of the *pourashava* or city corporation; and (vii) environmental and/or social safeguards officers of the PIU. The local GRC shall meet weekly, unless the Head of the PIU informs that there are no grievances to address, or they shall meet as needed as per the severity of the grievance. The local GRC will suggest corrective measures at the field level and assign responsibilities for implementing its decisions.

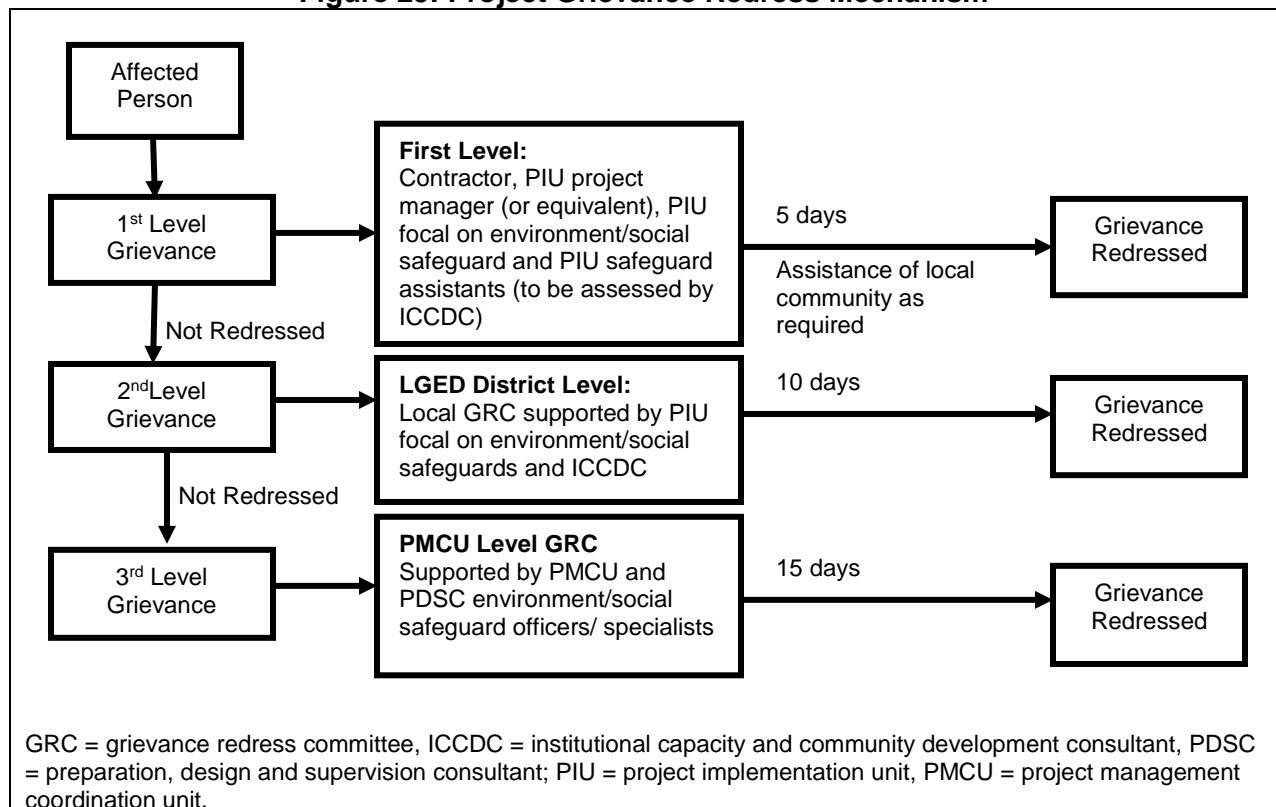
152. The functions of the local GRC are as follows: (i) provide support to affected persons on problems arising from land acquisition (temporary or permanent), asset acquisition and eligibility for entitlements, compensation and assistance, and other environmental or social safeguard issues unresolved at the first level of GRM; (ii) record grievances of affected persons, categorize and prioritize them and provide solutions within 10 days from receipt of grievance from the first level; and (iii) report to the aggrieved parties about developments regarding their grievances and decisions of the GRC.

153. **Third Level.** Should the grievance remain unresolved, the PIU head will activate the third level of the GRM by informing the PMCU project director who will, based on review of the local GRC minutes and consultation with the local GRC chair, activate the PMCU level GRC. This committee shall comprise the following representatives: (i) project director, PMCU; (ii) deputy project director, PMCU; (iii) environmental/resettlement safeguards officer of the PMCU; (iv) representative from Land Ministry; (v) representative from DOE; (vi) representative of the affected persons; and (vii) environmental and/or social safeguards officers of the PIU. The project director will sign off on all grievances received by the PMCU.

154. The GRC at the PMCU level shall meet based on the receipt of grievances, and the meeting shall be convened, and grievance redressed within 15 days of receipt of the grievance

by the PMCU. The environmental and/or social safeguards officer of the PMCU will be responsible for processing and placing all papers before the PMCU GRC, recording decisions, issuing minutes of the meetings and taking follow up action to see that formal orders are issued and the decisions carried out, and final decision conveyed to the complainant.

Figure 29: Project Grievance Redress Mechanism^a



^a Outline adopted from GRM of CRDP, and revised to conform with new arrangements and nomenclatures of the project.

155. The GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage. This can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

156. If the established GRM is not in a position to resolve the issue, the affected persons can also use the ADB Accountability Mechanism through directly contacting (in writing) the complaint receiving officer at ADB headquarters. The complaint can be submitted in any of the official languages of ADB's Developing Member Countries. The ADB Accountability Mechanism information will be included in the project information document to be distributed to the affected communities, as part of the project GRM.

VII. ENVIRONMENTAL MANAGEMENT PLAN

A. Institutional Arrangements

157. **Project Management Coordination Unit.** LGED will be the executing agency responsible for overall guidance of the project and implementation of urban roads and solid waste

management subprojects. The PMCU, headed by a Project Director will be responsible¹⁸ for planning, management, coordination, supervision and progress monitoring of the project in the two city regions. The PMCU has the responsibility of fulfilling environmental requirements of the government and conducting required level of environmental assessment as per ADB SPS, 2009. To ensure effective implementation of the environmental aspects, one full-time environmental safeguards officer who is a permanent employee of LGED will be assigned at PMCU. The environmental safeguards officer will primarily be responsible for the compliance to the statutory and legal requirements, including overall supervision of the implementation of the environmental management provisions in the IEEs/EMPs for the subprojects. The PDSC will assist the PMCU in this regard.

158. Project Implementation Unit. The Araihasar PIU will be responsible for the day-to-day activities of project implementation in the field and will have direct supervision to all contractors at subproject sites. Araihasar PIU will appoint at least one environment staff responsible for day-to-day monitoring of the project progress and implementation of the environmental provisions in the EMP. and the environment staff will ensure compliance with government and ADB requirements on environmental safeguards. The Araihasar PIU will prepare quarterly progress reports on all aspects concerning environmental assessment, management, monitoring, and report to the PMCU.

159. Preparation, Design and Supervision Consultants. The preparation, design and supervision consultants (PDSC) team shall include the following environmental safeguards expertise to effectively implement the EARF and relevant provisions of the IEE reports of the subprojects: (i) an international environmental safeguards specialist (to be hired only on “as needed” basis); and (ii) national environmental specialists (for duration of implementation). These personnel will provide technical support to the PMCU and Araihasar PIU including implementation of the environmental requirements, according to ADB SPS, 2009, and assist in monitoring impacts and mitigation measures associated with subprojects. The PDSC safeguards specialists will support environmental management functions including updating subproject IEEs with respect to environmental management plans, assisting in preparing IEEs, and assist in monitoring impacts and mitigation measures associated with subprojects. The consultants will also provide needed training and capacity building support to the PMCU and Araihasar PIU. The Terms of Reference for project environmental personnel is provided in Appendix 11.

160. Contractors. The contractors will have specific roles in the implementation of the EMPs. Each contractor shall have at least one full time environmental health and safety supervisor (or equivalent) responsible for implementing applicable measures in the EMP. All these specific roles and responsibilities are discussed in this IEE report which shall form part of the contract documents. Araihasar PIU will monitor contractors’ environmental performance.

161. Table 20: Institutional Roles and Responsibilities Table 20 summarizes the overall roles and responsibilities of PMCU, Araihasar PIU, and ADB.

Table 20: Institutional Roles and Responsibilities

Project Management Coordination Unit	Project Implementation Unit	ADB
Pre-construction stage		

¹⁸ PMCU responsibilities shall include management of (i) Local Government Grant facility, (ii) Investment components under the project, and (iii) Institutional Strengthening and Capacity building of the local governments. The project PMCU will be advised by a Technical Advisory and Selection Committee and an Urban Management Support unit.

Project Management Coordination Unit	Project Implementation Unit	ADB
Environmental officer of the PMCU, with assistance from the environmental specialist(s) of the PDSC to conduct rapid environmental assessment (REA) for each subproject using checklists available on ADB's website. Based on the REA, categorize the project based on ADB's SPS. Submit all categorization forms to ADB.	PDSC will assist the PIU and conduct IEE (or update existing IEE) for all Category B subprojects, which will include an EMP. PIU with assistance from the environmental officer of the PMCU and the environmental specialist of the PDSC to carry out public consultation during IEE process and incorporate consultation findings into project designs and IEE.	ADB to review the REA checklists and reconfirm the categorization.
PMCU based on review, will approve the IEE and send to ADB for review and clearance before contract award. The IEE also made available on request. Ensure IEE with the corresponding EMP is part of contract documents for category B subprojects and/or components. If the subproject and/or component is of category 'C', the PMCU to provide generic mitigation measures, if any, to be implemented. For Category C subprojects, no IEE/EIA is required, only a review of the environmental implications.	After the approval of IEE by PMCU and clearance by ADB, PIU with the assistance of PDSC to disclose the IEE and EMP to public information as required by ADB's SPS. PDSC, on behalf of the PIU, to incorporate mitigation measures in project design, specified in IEE and incorporate environmental mitigation and monitoring measures that need to be incorporated into contract document.	ADB will review and grant clearance of IEE/EMPs for subprojects before award of contracts. ADB will disclose cleared and government-endorsed IEEs on its website.
Environmental officer of PMCU to provide guidance to the PIU to ensure conformance of all subprojects to the regulatory compliance, with regard to environment. This shall include guidance in preparation of the documents as required for the issuance of ECC under the ECR and other necessary clearances such as for example tree cutting permits from the Ministry of Environment and Forests, submission of application forms, and liaising with agencies towards obtaining ECC, tree-cutting permits, and other clearances from relevant government agencies. Environmental officer of PMCU shall notify the ADB on obtaining of these clearances, including the conditions specified if any in the clearances, and integration of these into the contracts/EMP.	ECR stipulates that for (i) green, (ii) orange-A, (iii) orange-B, and (iv) red category projects, obtaining of environmental clearance certificate from DOE is a prerequisite. The environmental support staff of the PIU with assistance from PDSC environmental specialists shall compile the necessary information required for submission of application forms for clearances, obtaining NOC from local authorities, etc. Until the obtaining of clearance certificate from DOE, the environmental support staff will interact with the DOE on a regular basis and provide necessary documentation/clarifications as required.	ADB to ensure that the clearance requirements are included in the contract provisions/EMP.
Environmental officer of PMCU to ensure that the IEE containing the EMP of each subproject is included in the bid and contract documents. At the same time, the environmental officer of PMCU to ensure that the total budget for implementing the EMP is included in the bid and contract documents.	The environmental support staff of PIU to ensure that: (i) each contractor prepares its SEMP based on the EMP in the subproject IEE, and (ii) budget is included in the SEMP.	
Construction stage		
PMCU to review the PIU monthly monitoring reports to ensure that all	Contractors to conduct environmental monitoring and implement EMPs. PIU	ADB to review the reports and

Project Management Coordination Unit	Project Implementation Unit	ADB
mitigation measures are implemented. PMCU to consolidate the monthly reports and submit semi-annual reports to ADB for review. Corrective actions to be undertaken if needed.	with support of the environmental specialist(s) of PDSC to (i) review and approve the contractors' implementation plan for the environmental provisions in the EMP, and (ii) monitor the implementation of mitigation measures by contractor. The PDSC with PIU to prepare monthly progress reports including a section on implementation of the mitigation measures and submit to PMCU for review. PMCU to submit semi-annual monitoring report to ADB.	provide necessary advice/guidance needed to the PMCU.
Operation Stage		
LGED and Araihaazar PIU to conduct monitoring, as specified in the environmental monitoring plan of EMP. The DOE to monitor the performance, if required and as specified in monitoring plan of EMP.		ADB to review semi-annual environmental monitoring report and disclose on its website. ADB to prepare project completion report
PMCU to continue submission of semi-annual environmental monitoring report to ADB until ADB issues a project completion report.		

ADB = Asian Development Bank, DOE = Department of Environment, ECC = Environmental Compliance Certificate, ECR = Environmental Conservation Rules, EIA = environmental impact assessment, EMP = environmental management plan, IEE = initial environmental examination, PDSC = preparation, design, and supervision consultant, NOC = no objection certificate, PIU = project implementation unit, PMCU = project management coordination unit, REA = rapid environmental assessment, SPS = safeguards policy statement.

B. Environmental Management Plan

162. An environmental management plan (EMP) has been developed to provide mitigation measures to reduce all negative impacts to acceptable levels.

163. The EMP will guide the environmentally-sound construction of the subproject and ensure efficient lines of communication between PMCU, Araihaazar PIU, consultants and contractors. The EMP will (i) ensure that the activities are undertaken in a responsible non-detrimental manner; (ii) provide a pro-active, feasible and practical working tool to enable the measurement and monitoring of environmental performance on site; (iii) guide and control the implementation of findings and recommendations of the environmental assessment conducted for the subproject; (iv) detail specific actions deemed necessary to assist in mitigating the environmental impact of the subproject; and (v) ensure that safety recommendations are complied with. The EMP includes a monitoring program to measure the environmental condition and effectiveness of implementation of the mitigation measures. It will include observations on- and off-site, document checks, and interviews with workers and beneficiaries.

164. The contractor will be required to (i) carry out all of the mitigation and monitoring measures set forth in the approved EMP; and (ii) implement any corrective or preventive actions set out in safeguards monitoring reports that PMCU will prepare from time to time to monitor implementation

of this IEE, EMP and site-specific EMP (SEMP). The contractor shall allocate budget for compliance with these IEE, EMP and SEMP measures, requirements and actions. The contractor will be required to submit to PIU, for review and approval, SEMP including (i) proposed sites/locations for construction work camps, storage areas, hauling roads, lay down areas, disposal areas for solid wastes and excavation spoils; (ii) specific mitigation measures following the approved EMP; and (iii) monitoring program per EMP. No works can commence prior to approval of SEMP.

Table 21: Environmental Management Plan Matrix

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
1. Before Construction Activities					
Consents, permits, clearances, etc.	Failure to obtain necessary consents, permits, and other appropriate regulatory clearances can result to design revisions and work stoppage	<ul style="list-style-type: none"> - Obtain all of the necessary consents, permits, and clearances before the start of civil works. - Include in detailed design drawings and documents all conditions and provisions if necessary 	Project management coordination unit (PMCU), Araihaazar project implementation unit (PIU), preparation, design and supervision consultant (PDSC)	Incorporated in final design and communicated to contractors	Before award of contract
Existing utilities	Disruption of services	<ul style="list-style-type: none"> - Identify and include locations and operators of these utilities in the detailed design documents to prevent unnecessary disruption of services during construction - Require construction contractors to prepare a contingency and spoil management plan 	PMCU, Araihaazar PIU, PDSC	List of affected utilities and operators; Bid document to include a requirement for a contingency plan for service interruptions, e.g. provision of water if disruption is more than 24 hours, spoil management plan	During detailed design phase Review of spoils management plan: Twice (once after first draft and once before final approval)
Construction work camps, stockpile areas, storage areas, and disposal areas	Disruption to traffic flow and sensitive receptors	<ul style="list-style-type: none"> - Determine locations before award of construction contracts 	PMCU, Araihaazar PIU, PDSC	List of selected sites for construction work camps, hot mix plants, stockpile areas, storage areas, and disposal areas.	During detailed design phase

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
				Written consent of landowner/s (not lessee/s) for reuse of excess spoils to agricultural land	
Waste generation	Generation of solid waste, wastewater from labor camp and other construction waste may cause pollution	<ul style="list-style-type: none"> - Follow the principle of "Reduce, Reuse, Recycle, and Recover" - Prohibition of unwanted littering and discharge of waste. - Solid waste is either managed in a pit or disposed in municipal collection system. 	Contractor	Contractor records. Visual inspection	Visual inspection by Araihaazar PIU and PDSC on monthly basis
Sources of materials	Extraction of materials can disrupt natural land contours and vegetation resulting in accelerated erosion, disturbance in natural drainage patterns, resulting water logging, and water pollution	<ul style="list-style-type: none"> - Prepare list of approved quarry sites and sources of materials 	PMCU, Araihaazar PIU, PDSC	List of approved quarry sites and sources of materials; (ii) Bid document to include requirement for verification of quarry sites	During detailed design phase, as necessary with a discussion with detailed design engineers and Araihaazar PIU suitability of sources and permit for additional quarry sites if necessary.
Environmental management plan (EMP) Implementation Training	Without training, the EMP may not be implemented efficiently. Hence, will have impact to the	<ul style="list-style-type: none"> - Project manager and contractors should be trained on EMP implementation, spoils management, standard operating procedures (SOP), health and safety 	PMCU, Araihaazar PIU, PDSC, Contractor's Environmental Supervisor	Record of completion (Safeguards Compliance Orientation) Contractor records for EMP implementation	During the detailed design phase before the mobilization of workers to site

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
	environment, workers, and community	(H&S), applicable regulatory compliance.		on at worksites	
2. During Construction Activities					
A. Physical Characteristics					
Topography landforms, geology, and soils and river morphology and hydrology	Sand, gravel or crushed stone will be required for this town project. Extraction of natural aggregate materials may cause localized changes in topography and landforms (if on land) or river morphology and hydrology (if on the river).	<ul style="list-style-type: none"> - Utilize readily available sources with environmental clearance and license - Borrow areas and quarries comply with environmental requirements. - Coordinate with local authorities such as the Bangladesh Water Resources Development Board for quarrying from rivers. Alternative sources should be identified. 	Contractor	Records of sources of materials	Monthly by Araihaaz PIU
Water quality	Trenching and excavation, run-off from stockpiled materials and chemical contamination from fuels and lubricants may result to silt-laden runoff during rainfall, which may cause siltation and reduction in the quality of adjacent bodies of water.	<ul style="list-style-type: none"> - Follow WB EHS Guidelines on Construction and Decommissioning Activities; - Dispose excess spoils per the Spoil Management Plan attached in Appendix 5; - Locate temporary storage areas on flat grounds and away from main surface drainage routes (ideally at least 100 m from surface water); - Shield temporary storage areas with sandbags; - Provide adequate water supply and sanitation facilities at work sites; 	Contractor	Areas for stockpile storage of fuels and lubricants and waste materials; Number of silt traps installed along trenches leading to water bodies; No visible degradation to nearby drainage, water bodies due to construction activities	Visual inspection by Araihaaz PIU and/or PDSC on weekly basis Frequency and sampling sites to be finalized during detailed design.

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
		<ul style="list-style-type: none"> - Provide impervious bunded areas with 110% volume for storage of petroleum products used during construction, such as fuel, oils, and lubricants; - Provide orientation and training to assigned workers on the correct handling of petroleum-based products, clean-up of equipment, and response measures in case spills or emergencies using a well prepared emergency response plan; - Ensure no refueling within 100 m from surface water. - Take precautions to minimize the overuse of water; - Prevent wastewater into water sources; - Ensure safe water diversion; and - No obstruction in flowing water. 			
Air quality	Work at the dry season and transporting construction materials may increase dust, carbon, monoxide, sulfur oxides, particulate matter, nitrous oxides, and hydrocarbon	<ul style="list-style-type: none"> - Follow World Bank's Environmental Health and Safety (EHS) Guidelines on Construction and Decommissioning Activities; - Confine earthworks according to excavation segmentation plan that should be part of site-specific environmental management plan (SEMP); 	Construction Contractor	Location of stockpiles; Number of complaints from sensitive receptors; Heavy equipment and machinery with air pollution control devices; A certification that vehicles	Visual inspection by Araihaaz PIU and/or PDSC on monthly basis Ambient air quality testing will be conducted consistent with the monitoring plan, or

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
	s in air environment	<ul style="list-style-type: none"> - Prepare and implement a dust management plan that should be part of the SEMP; - Consult with PIU on the designated areas for stockpiling of sand, gravel, and other construction materials (ideally about 500 m from residential areas); - Bring construction materials (aggregates, sand, etc.) to the construction site as and when required to avoid heavy stockpiling at the sites; - Damp down with water dry exposed surfaces and stockpiles of aggregates at least twice daily, or as necessary; - If re-surfacing of disturbed roads cannot be done immediately, spread crushed gravel over backfilled surfaces; - During demolition, water exterior surfaces, unpaved ground in the immediate vicinity and demolition debris; - Place signage at active work sites in populated areas; - Require trucks delivering aggregates and cement to have tarpaulin cover; - Clean wheels and undercarriage of 		are compliant with Bangladesh vehicle emission standards. Ambient air quality tests.	increase frequency as may be needed.

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
		<ul style="list-style-type: none"> vehicles prior to leaving construction sites; - Limit speed of construction vehicles on access roads and work sites to a maximum of 30 km/h; - Prohibit burning firewood in work and labor camps (promote liquified petroleum gas for cooking purposes and electric heater for heating purposes); - Use vehicles that have government-issued permits and registrations, complying with Bangladesh vehicle emission standards; and - Prohibit open burning of solid waste. - - 			
Acoustic environment	Temporary increase in noise level and vibrations by excavation equipment, and the transportation of materials, equipment and people.	<ul style="list-style-type: none"> - Follow WB EHS Guidelines on Construction and Decommissioning Activities. - If applicable to subproject alignment, prepare and implement a noise and vibration management plan that should be part of the SEMP; - Provide prior information to the local public, including institutions such as schools and hospitals, about the work schedule; 	Contractor	Number of complaints from sensitive receptors; Use of silencers in noise-producing equipment Use of sound barriers or enclosures for generators, if any; Noise level measured at day time and night time	Visual inspection by Araihaaz PIU and/or PDSC on monthly basis

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
		<ul style="list-style-type: none"> - Use equipment that emits the least noise, well-maintained and with efficient mufflers. Install silencers if necessary and practical; - Restrict noisy activities to day time; - Avoid use of noisy equipment or doing noisy works at night time; - Limit engine idling to a maximum of one minute; - Spread out the schedule of material, spoil and waste transport; - Minimize drop heights when loading and unloading coarse aggregates; - Not use horns unless it is necessary to warn other road users or animals of a vehicle's approach; - Warning signs in noise hazard areas. Require workers to wear ear plugs while in these areas; and - Identify vibration risk to nearby structures. Take caution working in such areas. 			
Aesthetics	Interference with the enjoyment of the area and creation of unsightly or	<ul style="list-style-type: none"> - Prepare a debris disposal plan. - Minimize stockpile size - Clear wastes regularly - Avoid stockpiling of excess spoils. 	Contractor	<p>Number of complaints from sensitive receptors;</p> <p>Worksite clear of all</p>	Visual inspection by Araihaazar PIU and/or PDSC on monthly basis

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
	offensive conditions	<ul style="list-style-type: none"> - Cover delivery trucks during transportation. - Clean roads. - Use screening enclosure shade cloth, temporary walls - Clean site regularly. - Follow the principle of "Reduce, Reuse, Recycle, and Recover" 		<p>types of wastes</p> <p>Worksite clear of any wastes unutilized materials, and debris</p> <p>Transport route and worksite cleared of dirt</p>	
B. Biological Characteristics					
Biodiversity	<p>Potential cutting of trees along road alignments</p> <p>Threat to animals due to poaching or leisure catching by workers in the subproject areas</p>	<ul style="list-style-type: none"> - Tree cutting will be avoided, or minimized if total avoidance is not possible, for this subproject. - In case of unavoidable tree cutting, replacement of ten trees per tree cut and follow the Local Government Engineering Division (LGED) tree plantation program to implement this measure (see Appendix 6 for the LGED Manual). Further, any tree cutting activities shall be undertaken only outside the bird breeding season. - Any encounter with nomadic animal species will ensure these creatures are not hurt or killed. Any unintentional catch of any species should be reported and surrendered to authorized 	Contractor	<p>Number of trees cut and planted if any (during detailed design stage)</p> <p>Some complaints from sensitive receptors on disturbance of vegetation, poaching fishing, etc.</p>	Visual inspection by Araihaazar PIU and/or PDSC on monthly basis

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
		authorities for proper handling.			
C. Socioeconomic Characteristics					
Existing economic activities or businesses Existing provisions for pedestrians and other forms of transport	Potential road closures due to construction activities. Hauling of construction materials and operation of equipment on-site can cause traffic problems.	<ul style="list-style-type: none"> - Implement the Traffic Management Plan - Prepare suitable alternate transportation routes - Safe passage for vehicles and pedestrians - Avoid full road closures where possible by implementing section-wise or chainage wise approach during excavation, concreting and/or curing periods - Where full road closure is necessary especially in very narrow roads, inform affected residents or establishment prior to any construction activity and provide them with alternate routes. Ensure to complete construction activities in the fastest way possible. Provide appropriate compensation to qualified affected persons or businesses - Schedule material deliveries on low traffic hours. - Erect and maintain barricades if required 	Contractor	Traffic route during construction works, including number of permanent signs, barricades, and flagmen on worksite; Number of complaints from sensitive receptors; Some signage placed at the subproject location. Number of walkways, signage, and metal sheets placed at subproject location	Visual inspection by Araihaazar PIU and/or PDSC on monthly basis

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
		<ul style="list-style-type: none"> - Inform through display board about nature, duration of construction and contact for complaints - Complete the work quickly in nearby institution, place of worship, business, hospitals, and schools. - Consult with business and institutions for work schedules. - Restore damaged properties and utilities 			
Socioeconomic status	Staffing will be required during construction. This can result in an increase in local revenue.	<ul style="list-style-type: none"> - Engage the local workforce. However, child and forced labor shall be strictly prohibited. - Secure construction materials from local market. 	Contractor	Employment records; Records of sources of materials Records of compliance with Bangladesh Labor Act 2006.	Visual inspection by Araihaazar PIU and/or PDSC on monthly basis
Other amenities for community welfare	Civil works may result in an impact to the sensitive receptors such as residents, businesses, and the communities. Excavation may also damage infrastructure located alongside the roads.	<ul style="list-style-type: none"> - Identify location and nature of existing infrastructure before excavation - Minimize repeated disturbance to locals by integrating other forms of infrastructures. - Inform local about nature, duration and possible impacts of the construction and integrate their concerns - Promptly relocate infrastructure materials - Take prior permission from local authority for water use 	Contractor	Number of complaints from sensitive receptors	Visual inspection by Araihaazar PIU and/or PDSC on monthly basis

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
		<ul style="list-style-type: none"> - Restore damaged properties and utilities to pre-work conditions. 			
Community health and safety	<p>Construction works will impede the access of residents and business in limited cases. Construction works will raise danger to community people.</p>	<ul style="list-style-type: none"> - Restrict work force in designated areas. - Identify stockyard areas in consultation with local administration - Work on private land requires written permission of landowners. - Prefer small mechanical excavator for trenching - Prohibit alcohol and drugs on site - Prevent excessive noise; - Code of conduct for workers includes restricting workers in designated areas, no open defecation, no littering, no firewood collection, no fire except designated places, no trespassing, no residence at construction sites, and no obligation to potentially dangerous work - Follow international best practices on community health and safety such as those in Section 4.3 of World Bank Environmental Health and Safety (EHS) Guidelines on Construction and Decommissioning Activities - Maintain a complaint logbook in workers camp 	Contractor	<p>The number of permanent signs, barricades, and flagmen on worksites per Traffic Management Plan (see Appendix 10 for sample which can be modified according to applicability); Number of complaints from sensitive receptors; Number of walkways, signs, and metal sheets placed at the subproject location Agreement between landowner and contractors in case of using private land as work camps storage areas etc.</p>	Visual inspection by Araihaazar PIU and/or PDSC on weekly basis

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
		and take action promptly of complaints			
Workers Health and Safety	There is invariably a safety risk when construction works such as excavation and earthmoving are conducted in urban areas. Workers need to be mindful of the occupational hazards, which can arise from working at height and excavation works.	<ul style="list-style-type: none"> - Comply with Bangladesh Labor Act 2006. - Follow international best practices on occupational health and safety such as those in Section 4.2 of World Bank EHS Guidelines on Construction and Decommissioning Activities. - Train all site personnel on environmental health and safety - Exclude public from worksites - Provide personal protective equipment to workers and ensure their effective usage - Document procedures to be followed for site activities. - Maintain accident reports and records. - Make first aid kits readily available. - Maintain hygienic accommodation in work camps. - Ensure uncontaminated water for drinking, cooking and washing. - Ensure clean eating areas. - Ensure sanitation facilities are readily available. - Provide medical insurance coverage for workers. 	Contractor	Site-specific health and safety plan Equipped first-aid stations Medical insurance coverage for workers Number of accidents Records of supply of uncontaminated water Condition of eating areas of workers Record of orientation training Availability of personal protective equipment at construction site Percentage of moving equipment outfitted with audible back-up alarms Signage for storage and disposal areas Condition of sanitation facilities for workers	Visual inspection by Araihaazar PIU and/or PDSC on a weekly basis.

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
		<ul style="list-style-type: none"> - Provide orientation for guest visitors. - Ensure that visitors do not enter hazard areas unescorted. - Require workers to wear high visibility clothes. - Ensure moving equipment is outfitted with audible backup alarms. - Chemical and material storage areas need to be marked clearly. - Hearing protection equipment enforced in noisy environment. 			
D. Historical, Cultural, and Archaeological Characteristics					
Physical and cultural heritage	There are no archaeological, paleontological, or architectural sites of significance listed by Bangladesh Department of Archaeology and United Nations Educational, Scientific and Cultural Organization (UNESCO).	<ul style="list-style-type: none"> - Stop work immediately to allow further investigation if any findings are suspected. 	Contractor	Records of chance finds	Visual inspection by Araihaazar PIU and/or PDSC Monthly basis.
E. Others					
Submission of EMP implementation Report	Unsatisfactory compliance to EMP	<ul style="list-style-type: none"> - Appointment of full time EHS supervisor (or equivalent) - Timely monitoring reports with field photographs 	Contractor	Availability and competency of appointed supervisor Daily monitoring sheets by Contractor	Monthly monitoring report to be submitted by contractors to Araihaazar

Field	Impacts	Mitigations Measures	Responsible for Implementation	Monitoring Indicator	Frequency of Monitoring
				EHS supervisor Monthly monitoring reports by Contractor to Araihaazar PIU.	PIU and Araihaazar PIU submit quarterly reports to PMCU. PMCU to submit semi-annual monitoring report to ADB
3. During Post Construction Activities and Operation and Maintenance					
Post construction site clearing activities	Damage due to debris, spoils, excess construction materials	<ul style="list-style-type: none"> - Remove spoils wreckage, rubbish, or temporary structures no longer required; - All disrupted utilities should be restored - All affected structures rehabilitated /compensated - The construction camp needs to clear of spills e.g. oil, paint, etc. and other pollutants after dismantling - All hardened surfaces shall be ripped; all imported materials shall be removed, and all temporary services shall be cancelled - Fully reinstate path ways, other local infrastructure, and agricultural land to at least their pre-project condition as recorded by the Contractor - Request PMCU or PIUs in writing that worksites and camps are already vacated and 	Contractor	PMCU and/or Araihaazar PIU report in writing that (i) worksite is restored or reinstated to at least original conditions; (ii) camp has been vacated and restored to pre-project conditions; (iii) all construction related structures not relevant to operation and maintenance are removed, and (iv) worksite clean-up is satisfactory.	Before turnover of completed works to Araihaazar PIU

Field	Impacts	Mitigations Measures	Responsible for Implementati on	Monitoring Indicator	Frequenc y of Monitorin g
		restored to at least pre-project conditions			

C. Environmental Monitoring Program

165. Monitoring of mitigation measures during construction is the responsibility of the PIU supported by the PMCU Environment Officer and PDSC Environmental Specialist. Table 22 shows the proposed Environmental Monitoring Plan for this subproject, which specifies the various monitoring activities, indicating location, frequency of monitoring and responsibility.

Table 22: Environmental Monitoring Program

Activities or Items to Monitor	Location	Responsible for Activities	Monitoring Method	Monitoring Frequency	Monitoring Responsibility
PRE-CONSTRUCTION					
Secure Environmental Compliance Certificate from Department of Environment	PMCU office	PMCU, PDSC	Copy of approved ECC	Before construction activities	PMCU, PDSC
IEEs and EMPs are included in bid and contract documents	PMCU office	PMCU, PDSC	Copies of bid and contract documents	Before approval tender document	PMCU, PDSC
Site-specific EMP (SEMP) submitted by Contractor for approval by PIU	PIU office	Contractor, PIU	Copy of approved SEMP	Before construction activities commence	PMCU, PDSC
Spoil management plan (SMP) submitted by Contractor for approval by PIU	PIU office	Contractor, PIU	Copy of approved SMP	Before construction activities commence	PMCU, PDSC
Traffic management plan (TMP) submitted by Contractor for approval by PIU	PIU office	Contractor	Copy of approved TMP	Before construction activities commence	PMCU, PDSC
Baseline environmental data gathering	All subproject sites	Contractor	Ambient air quality sampling Noise level measurements	Once before construction activities commence	PMCU, PDSC
Secure all other necessary permits and licenses from relevant government agencies		Contractor	Copies of permits and licenses	Before construction activities commence	PMCU, PIU, PDSC
CONSTRUCTION					
Implementation of SEMP; including implementation of community and occupational health and safety measures.	Subproject sites	Contractor	Site visits, Contractor records,	Weekly or as needed	PIU, PDSC
Implementation of SMP	Subproject sites	Contractor	Site visits, Contractor records	Weekly or as needed	PIU, PDSC
Implementation of TMP	Subproject sites	Contractor	Site visits, Contractor records	Weekly or as needed	PIU, PDSC
Conduct of ambient air quality sampling and noise level measurements	Subproject sites	Contractor	Contractor records, Results of laboratory analyses	At least semi-annual or as needed	PMCU, PIU, PDSC
Develop and apply archaeological protocol to protect chance finds	All subproject sites	Contractor, PMCU, Araihaazar PIU, PDSC	Contractor records	Once until protocol is approved	PMCU, PIU, PDSC
Provide EHS training for all	All	Contractor	Contractor	Monthly	PIU, PDSC

Activities or Items to Monitor	Location	Responsible for Activities	Monitoring Method	Monitoring Frequency	Monitoring Responsibility
personnel	subproject sites		records; Interviews to workers		
Keep accident reports and records	All subproject sites	Contractor	Contractor records; Interviews to workers and community people	Monthly	PIU, PDSC
Employ workforce from communities near sites	All subproject sites	Contractor	Contractor records	Monthly	PIU, PDSC
Implementation of EHS measures at construction camps	Construction camp sites	Contractor	Site visits; Interviews to workers at camps	Monthly	PIU, PDSC
OPERATION AND MAINTENANCE					
Maintain safe passage for vehicles and pedestrians during maintenance activities	Subproject road sites	PIU	Site observations	Monthly	LGED
Maintain all road signages at critical points particularly the accident-prone areas and areas near institutional establishments such as schools, places of worship, hospitals.	Subproject road sites	PIU	Site observations	Monthly	LGED
Provide signboards informing nature and duration of maintenance activities	Subproject road sites	PIU	Site observations	Monthly	LGED
Prevent run-off/deposit of foreign materials (oil, grease, solid waste, plastics) into watercourses, and clean drain periodically; dispose of materials removed from drains	Subproject road sites	PIU	Site observations	Monthly	LGED
Dispose of material from blocked drain in location away from roadway and drain	Subproject road sites	PIU	Site observations	Monthly	LGED

EHS = environmental, health and safety, IEE = initial environmental examination, LGED = Local Government Engineering Division, PDSC = preparation, design and supervision consultant, PIU = project implementation unit, PMCU = project management coordination unit, SMP = spoil management plan, TMC = traffic management plan.

D. Capacity Development Training

166. The PMCU safeguards experts (environmental and social) with support from PDSC Environment Specialist and Social Safeguard Specialist will be responsible for training the Araihasar PIU safeguards officers (environmental and social). Training modules will need to cover safeguards awareness and management in accordance with both ADB and government requirements as specified below:

- (i) Environmental Safeguards
 - (a) sensitization on ADB's safeguard policy on environment;
 - (b) introduction to environment and environmental considerations in roads, drainage and solid waste management projects;
 - (c) review of IEEs and integration into the project detailed design;
 - (d) community and occupational health and safety considerations;
 - (e) consultation and participation requirements;
 - (f) project GRM and ADB's Accountability Mechanism;
 - (g) improved coordination within nodal departments; and
 - (h) monitoring and reporting system. The contractors will be required to conduct environmental awareness and orientation of workers prior to deployment to work sites.
- (ii) Social Safeguards
 - (a) sensitization on ADB's policies on Involuntary Resettlement and Indigenous People;
 - (b) introduction to social safeguards assessment and document requirements;
 - (c) Consultation and participations requirements;
 - (d) Project GRM and ADB's Accountability Mechanism; and
 - (e) monitoring and reporting system.

167. The proposed training project along with the frequency of sessions is presented in Table 23.

Table 23: Training Program for Environmental Management

Items	Pre-construction	Construction	
Training Title	Orientation workshop	Orientation program/ workshop for contractors and supervisory staff	Experiences and best practices sharing
Purpose	To make the participants aware of the environmental safeguard requirements of ADB and Government of Bangladesh and how the project will meet these requirements	To build the capacity of the staff for effective implementation of the designed EMPs aimed at meeting the environmental safeguard compliance of ADB and Government of Bangladesh	To share the experiences and best practices aimed at learning lessons and improving implementation of EMP
Contents	Module 1: Orientation ADB Safeguards Policy Statement Government of Bangladesh Environmental Laws and Regulations	Roles and responsibilities of officials/contractors/consultants towards protection of the environment Environmental issues during construction Implementation of EMP	Experiences on EMP implementation – issues and challenges Best practices followed

Items	Pre-construction	Construction	
	Module 2: Environmental Assessment Process ADB environmental process, identification of impacts and mitigation measures, formulation of an environmental management plan (EMP), implementation, and monitoring requirements Review of environmental assessment report to comply with ADB requirements Incorporation of EMP into the project design and contracts	Monitoring of EMP implementation Reporting requirements	
Duration	1 day	1 day	1 day on a regular period to be determined by PMCU and PDSC
Participants	PMCU and PIU staff (technical and environmental) involved in the project implementation	PMCU, PIU, Contractors	PMCU, PIU, Contractors

E. Environmental Management and Monitoring Plan Implementation Cost (Indicative)

168. Most of the costs associated with environmental mitigation and enhancement measures are included in the EMP budget. In consideration to the environmental impacts and their mitigation measures for this subproject, some items need to be incorporated in the Bill of Quantities (BOQ) of this subproject. A substantial part of environmental costs shall cover under civil works contract. However, environmental costs under civil works contract are not included here. Costs of these items will be dealt elsewhere in the respective project component document. The environmental costs presented in Table 24 are tentative provisions based on experience of undertaking similar works under different LGED projects. For the details of environmental costs under civil works contract, individual contract package bid document may be consulted. It is assumed that the environmental cost under civil works contract for each contract package will be more or less same.

Table 24: Tentative Environmental Management Plan Budget for Bill of Quantities

(The following items need to be incorporated in the BOQ of this subproject):

Item No.	Description of Items	Unit	Quantity	Unit Rate (Tk)	Item Total (Tk)
1	Environmental Monitoring a) Air Quality, b) Noise level, c) Water quality, d) Sediment at work site to the entire satisfaction of the engineer-in-charge.	Lumps um		20000	20,000.00
2	Dust suppression measures (excluding watering for compaction) to the entire satisfaction of the engineer-in-charge.	m	9970	2.00	19,940.00
3	Prevention of spillage, leakages of polluting materials to the entire satisfaction of the engineer-in-charge.	Lumps um		5000	5,000.00
4	Providing and maintaining adequate potable water supply facilities (shallow Tube well) at camp site and work site to the entire satisfaction of engineer-in-charge. Two Water Supply Tube wells	Nos.	1	10000	10,000.00
5	Providing and maintaining adequate sanitation facilities at camp site and work site to the entire satisfaction of engineer-in-charge. Two Sanitation Toilets (one for women and one for men)	Nos.	2	5000	10,000.00
6	Rehabilitation of ancillary sites including stockpile sites, brick crushing sites, borrow areas, workforce camp, to the entire satisfaction of the engineer-in-charge.	m	5000	2	10,000.00
7	Proper disposal of camp site wastes to the entire satisfaction of the engineer-in-charge.	Lump sum		10000	10,000.00
8	Maintain First aid box at camp site to the entire satisfaction of the engineer-in-charge.	Lump sum		5000	5,000.00
Estimated cost for additional environmental items					89,940.00

VIII. MONITORING AND REPORTING

169. PMCU will monitor the progress of EMP implementation in the different subproject jurisdictions. The PMCU and PIU will undertake site inspections and document review to verify compliance with the EMP and progress toward the final outcome. The contractor will conduct day to day implementation of the SEMP.

170. The contractor will submit monthly reports to the PIU with jurisdiction over the subproject sites. The monthly reports will include compilation of copies of monitoring sheets accomplished and duly signed by the contractor's EHS supervisor (or equivalent) on a daily basis. A sample daily monitoring sheet which can be used by the contractors is in Appendix 12. This monitoring sheet is indicative which can be further enhanced depending on the actual situations at subproject construction sites.

171. The PIU will submit quarterly environmental monitoring reports to PMCU, which will include summary of daily monitoring activities of contractor and results of any independent monitoring or inspection activities of the PIU. In the conduct of these independent inspection activities, PIU will be supported by PDSC in this regard. A sample inspection checklist is in Appendix 13. This checklist is indicative which can be further enhanced depending on the actual situations at subproject construction sites.

172. PMCU shall consolidate quarterly reports from the PIUs including Araihaazar PIU and results of its independent monitoring or inspection activities. PMCU shall accomplish semi-annual environmental monitoring report (SEMRs), which shall be submitted to ADB for review and disclosure on ADB website. Submission of SEMR will continue until ADB issues a project completion report. The template for the SEMR is attached as Appendix 14.

173. ADB will carry out the following monitoring actions to supervise the project implementation:

- (i) On a need basis, conduct site visits for subproject with potential adverse environmental or social impact;
- (ii) Conduct supervision missions with detailed review by ADB's environment/social safeguard specialists and/or officers and/or consultants for subprojects with adverse environmental and social impacts;
- (iii) Review the SEMRs submitted by PMCU to ensure that adverse impacts and risks are mitigated as planned in the EMP;
- (iv) Work with LGED to rectify to the extent possible any failures to comply with its environmental safeguard commitments, as covenanted in the loan agreement and elaborated in all environmental safeguard documents; and formulate and implement a corrective action plan to re-establish compliance as appropriate; and
- (v) Prepare a project completion report that assesses whether the objective and desired outcomes of the safeguard plans have been achieved, taking into account the baseline conditions and the results of monitoring.

174. ADB's monitoring and supervision activities are carried out on an on-going basis until a project completion report is issued. ADB issues a PCR within 1-2 years after the project is physically completed and in operation.

IX. CONCLUSION AND RECOMMENDATIONS

175. The proposed subproject is not an environmentally critical undertaking. IEE indicates that the proposed subproject, and its components, is not located within or adjacent to environmentally sensitive areas.

176. The extent of adverse impacts is expected to be local, confined within the projects' main areas of influence, waste disposal sites, and the routes to and from these sites. With mitigation measures in place and ensuring that the bulk of earthworks are completed before the onset of the rainy season, the potential adverse impacts during construction would be site-specific.

177. The few adverse impacts of moderate magnitude during construction will be temporary and short-term (i.e., most likely to occur only during peak construction activities). These will not be sufficient to threaten or weaken the surrounding resources. Mitigation measures, integral to socially and environmentally responsible construction practices, are commonly used at construction sites and are well known to contractors. Hence, mitigation measures would not be difficult to implement.

178. Based on the above findings, the classification of the subproject under package no. CRDP-II/LGED/Narayanganj/Araihazar/NCB/2018/W-01 as Category B per ADB SPS, 2009 is confirmed, and no further special study or detailed EIA needs to be undertaken.

179. However, this IEE has been prepared based on preliminary designs of the subproject. Therefore, the PMCU shall update this draft IEE based on final detailed design and submit to ADB for review and disclosure. The approved updated IEE shall be treated as the final IEE, and shall be attached in the bid and contract documents. No works can commence until (i) the final IEE approved by ADB is provided to the Contractor, and (ii) the SEMP prepared by the Contractor is approved by Araihazar PIU. If circumstances would require, the IEE will be further updated for ADB's review during the implementation period. In the event of unanticipated impact and/or any design change and/or non-compliance during subproject implementation period, the IEE shall be updated to include (i) assessment of the unanticipated impact and corresponding mitigation measures; and/or (ii) information on the design change and assessment of associated environmental impacts, if any; and/or (iii) corrective actions, associated cost and schedule; respectively.

RAPID ENVIRONMENTAL ASSESSMENT CHECKLIST

Country/Project Title: Bangladesh / City Regions Development Project - II
Subproject / Package No.: CRDP-II/LGED/Narayanganj/Araihazar/ NCB/2018/W-01

Screening Questions	Yes	No	Remarks
A. Project Siting Is the project area adjacent to or within any of the following environmentally sensitive areas?			
▪ Cultural heritage site		✓	Based on desk review of locations and field verifications by Project Management and Coordination Unit (PMCU), there are no environmentally sensitive areas located within or near the subproject sites.
▪ Protected Area		✓	
▪ Wetland		✓	
▪ Mangrove		✓	
▪ Estuarine		✓	
▪ Buffer zone of protected area		✓	
▪ Special area for protecting biodiversity		✓	
B. Potential Environmental Impacts Will the Project cause...			
▪ encroachment on historical/cultural areas; disfiguration of landscape by road embankments, cuts, fills, and quarries?		✓	
▪ encroachment on precious ecology (e.g. sensitive or protected areas)?		✓	
▪ alteration of surface water hydrology of waterways crossed by roads, resulting in increased sediment in streams affected by increased soil erosion at construction site?	✓		Construction and rehabilitation of roads and drainages will potentially increase siltation of surface waters near or along the alignments. However, this impact will be mitigated through implementation of measures in the EMP.
▪ deterioration of surface water quality due to silt runoff and sanitary wastes from worker-based camps and chemicals used in construction?	✓		Construction and rehabilitation of roads and drainage will potentially increase siltation of surface waters near or along the alignments. However, this impact will be mitigated through implementation of measures in the EMP.
▪ increased local air pollution due to rock crushing, cutting and filling works, and chemicals from asphalt processing?		✓	Rock crushing and asphalt processing will not be undertaken under the subprojects. Aggregates to be used in the construction will be sourced from legitimate suppliers.
▪ risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project construction and operation during project construction and operation?	✓		Construction activities will pose risks to workers. However, this can be mitigated through the implementation of the EMP particularly occupational health and safety measures both at work sites and construction camp sites.
▪ noise and vibration due to blasting and other civil works?	✓		Construction activities will elevate noise levels and vibration. However, this can be mitigated through the implementation of related measures in the EMP.
▪ dislocation or involuntary resettlement of people?		✓	Not anticipated. All works will be confined on existing road and drainage alignments.
▪ dislocation and compulsory resettlement of people living in right-of-way?		✓	Not anticipated. All identified road and drainage alignments are free of settlements. No widening work is included.
▪ disproportionate impacts on the poor, women and children, Indigenous Peoples or other vulnerable groups?		✓	Once completed, the roads and drainages under the subprojects will benefit all sectors of the society, including the disadvantaged and vulnerable groups.

<ul style="list-style-type: none"> other social concerns relating to inconveniences in living conditions in the project areas that may trigger cases of upper respiratory problems and stress? 	✓		Construction activities will potentially increase pollutant concentration in ambient air. However, this can be mitigated through the implementation of community and occupational health and safety measures in the EMP.
<ul style="list-style-type: none"> hazardous driving conditions where construction interferes with pre-existing roads? 	✓		Construction activities may pose hazardous driving conditions at the sites. However, the implementation of the traffic management plans (TMPs) will mitigate this impact.
<ul style="list-style-type: none"> poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases (such as STI's and HIV/AIDS) from workers to local populations? 	✓		Construction activities may result to poor sanitation and improper solid waste handling and disposal. However, this can be mitigated through the implementation of related measures in the EMP.
<ul style="list-style-type: none"> creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents? 	✓		The EMP provides measures to avoid proliferation of disease vectors.
<ul style="list-style-type: none"> accident risks associated with increased vehicular traffic, leading to accidental spills of toxic materials? 		✓	Not anticipated.
<ul style="list-style-type: none"> increased noise and air pollution resulting from traffic volume? 	✓		Construction activities will elevate noise levels and worsen air pollution due to traffic. However, the TMPs will provide measures to avoid traffic congestion at subproject sites.
<ul style="list-style-type: none"> increased risk of water pollution from oil, grease and fuel spills, and other materials from vehicles using the road? 		✓	Not anticipated.
<ul style="list-style-type: none"> social conflicts if workers from other regions or countries are hired? 		✓	Labor requirements will be sourced locally.
<ul style="list-style-type: none"> large population influx during project construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)? 		✓	Labor requirements will be sourced locally.
<ul style="list-style-type: none"> risks to community health and safety due to the transport, storage, and use and/or disposal of materials such as explosives, fuel and other chemicals during construction and operation? 	✓		Construction activities will pose risks to community health and safety. However, this can be mitigated through the implementation of related measures in the EMP. These measures include implementation of the WB EHS guidelines on construction and decommissioning related to community health and safety.
<ul style="list-style-type: none"> community and occupational safety risks due to both accidental and natural causes, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project construction, operation and decommissioning. 	✓		Construction activities will pose risks to community health and safety. However, this can be mitigated through the implementation of related measures in the EMP. These measures include implementation of the WB EHS guidelines on construction and decommissioning related to community and occupational health and safety.

A Checklist for Preliminary Climate Risk Screening

Country/Project Title: Bangladesh / City Regions Development Project - II
Subproject / Package No.: CRDP-II/LGED/Narayanganj/Araihazar/ NCB/2018/W-01

Screening Questions		Score	Remarks ^a
Location and Design of project	Is siting and/or routing of the project (or its components) likely to be affected by climate conditions including extreme weather related events such as floods, droughts, storms, landslides?	1	
	Would the project design (e.g. the clearance for bridges) need to consider any hydro-meteorological parameters (e.g., sea-level, peak river flow, reliable water level, peak wind speed etc.)?	1	
Materials and Maintenance	Would weather, current and likely future climate conditions (e.g. prevailing humidity level, temperature contrast between hot summer days and cold winter days, exposure to wind and humidity hydro-meteorological parameters likely affect the selection of project inputs over the life of project outputs (e.g. construction material)?	1	
	Would weather, current and likely future climate conditions, and related extreme events likely affect the maintenance (scheduling and cost) of project output(s) ?	1	
Performance of project outputs	Would weather/climate conditions, and related extreme events likely affect the performance (e.g. annual power production) of project output(s) (e.g. hydro-power generation facilities) throughout their design life time?	1	

^a If possible, provide details on the sensitivity of project components to climate conditions, such as how climate parameters are considered in design standards for infrastructure components, how changes in key climate parameters and sea level might affect the siting/routing of project, the selection of construction material and/or scheduling, performances and/or the maintenance cost/scheduling of project outputs.

Options for answers and corresponding score are provided below:

Response	Score
Not Likely	0
Likely	1
Very Likely	2

Responses when added that provide a score of 0 will be considered low risk project. If adding all responses will result to a score of 1-4 and that no score of 2 was given to any single response, the project will be assigned a medium risk category. A total score of 5 or more (which include providing a score of 1 in all responses) or a 2 in any single response, will be categorized as high risk project.

Result of Initial Screening (Low, Medium, High): Medium

Other Comments: _____

Prepared by: _____

**TEMPLATE FOR APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE
FROM BANGLADESH DEPARTMENT OF ENVIRONMENT**

Application for Environmental Clearance Certificate

[See Rule 7(5) of ECR]

Director/Deputy Director
Department of Environment
Dhaka Division/Chittagong Division/Khulna Division/Rajshahi Division (Bogra),

Sir,

I do hereby apply for Environmental Clearance Certificate for my proposed industrial unit or project, or for the existing industrial unit or project, and enclose papers and furnish information as follows:

1. (a) Name of the industrial unit or project :
Address of location of the industrial unit of Project :
- (b) Address of the present office :
2. (a) Proposed industrial unit or project :
Expected date of starting construction :
Expected date for completion of construction :
Expected date of trial production, in case of industrial unit, in :
other cases, date of starting operation of the project :
- (b) Existing industrial unit or project :
Date of starting trial production in case of industrial unit, in :
other cases, date of starting operation of the project :
3. Name of product and quantity to produced :
(daily/monthly/yearly)
4. (a) Name of raw material and quantity :
(daily/monthly/yearly)
- (b) Source of raw material :
5. (a) Quantity of water to be used daily :
(b) Source of water :
6. (a) Name of fuel and quantity (daily/monthly/yearly) :
(b) Source of fuel :
7. (a) Probable quantity of daily liquid waste :
(b) Location of waste discharge :
(c) Probable quantity of daily emission of gaseous :
substance :
(d) Mode of emission of gaseous substance :
8. Mouza (village) map indicating "Daag" (plot) and "Khatiyani" :
(land tax account) number
9. Approval of Rajdhani Unnayan Katiripakkhya / Chittagong :
Development Authority / Khulna Development Authority /
Local Authority (if applicable)
10. (a) Design and time schedule of proposed Effluent :
Treatment Plant :
(b) Fund allocated :

- (c) Area :
- 11. Process Flow Diagram :
- 12. (a) Location map of industrial unit or project :
- (b) Layout plan (with location of Effluent Treatment Plant) :
- 13. (a) IEE / EIA report * (if applicable) :
- (b) Environmental Management Plan*(if applicable) :
- 14. Feasibility Report (if applicable) :

Seal

Signature of the entrepreneur:

Name:

Address:

Phone:

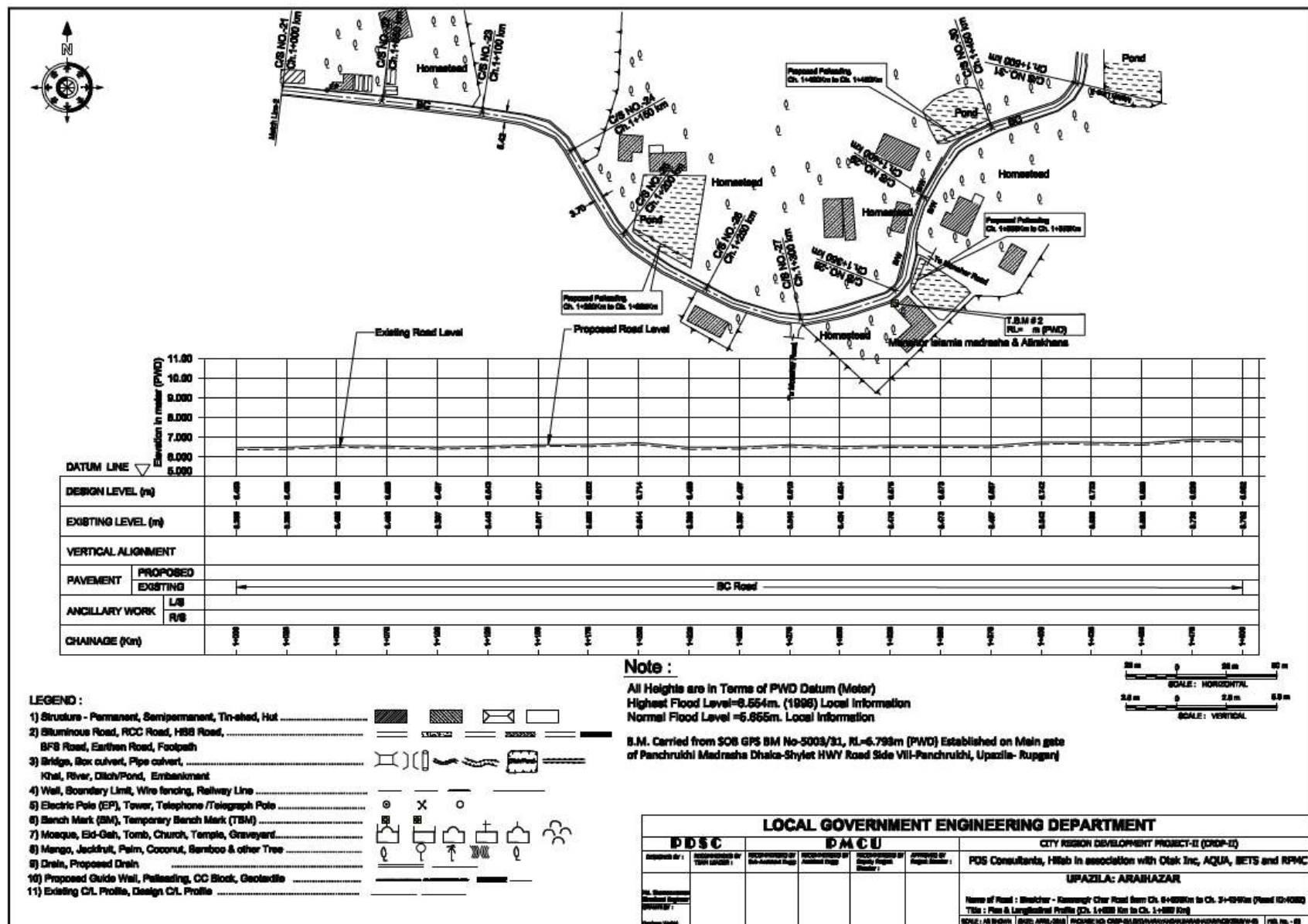
Date:

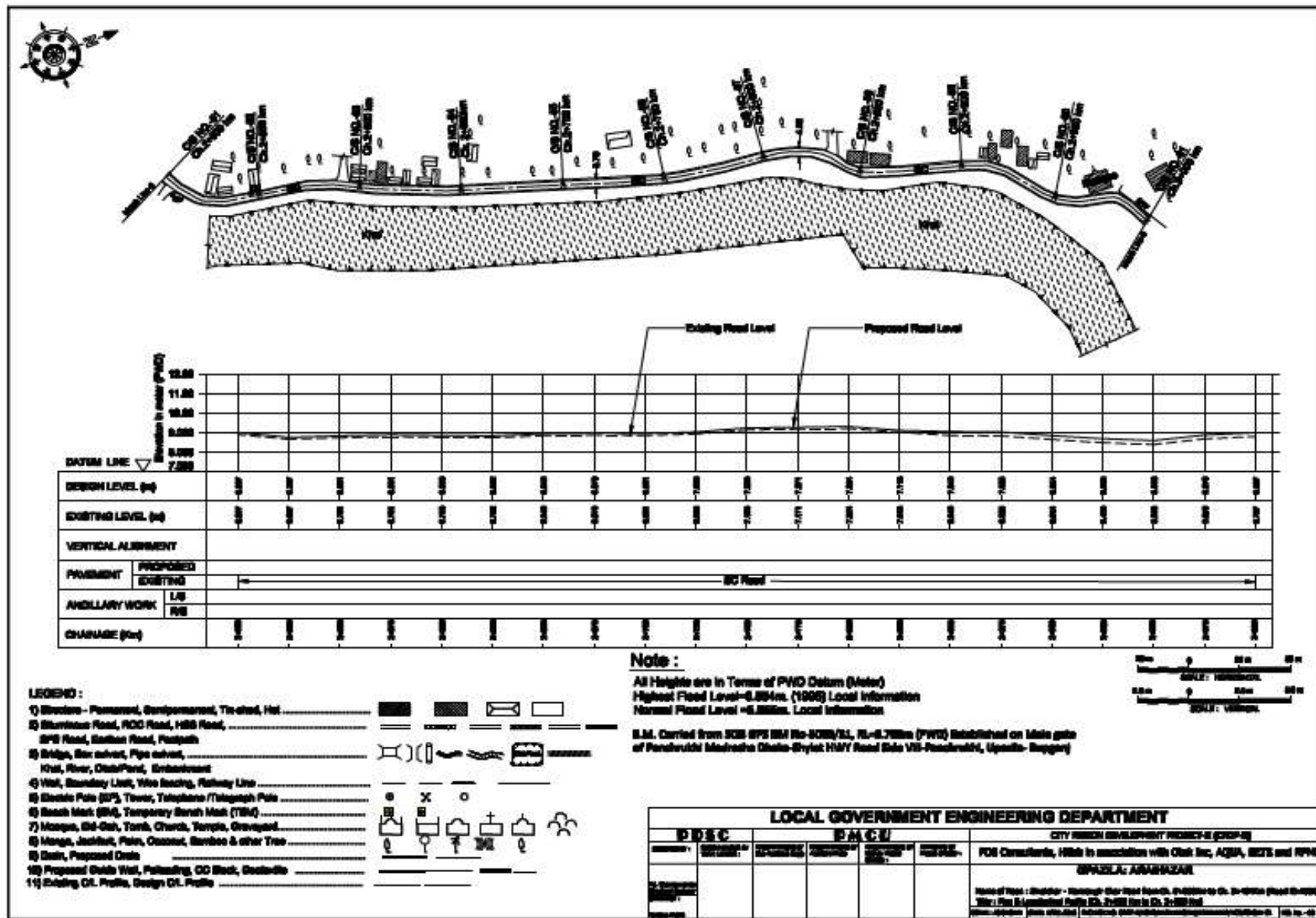
Declaration

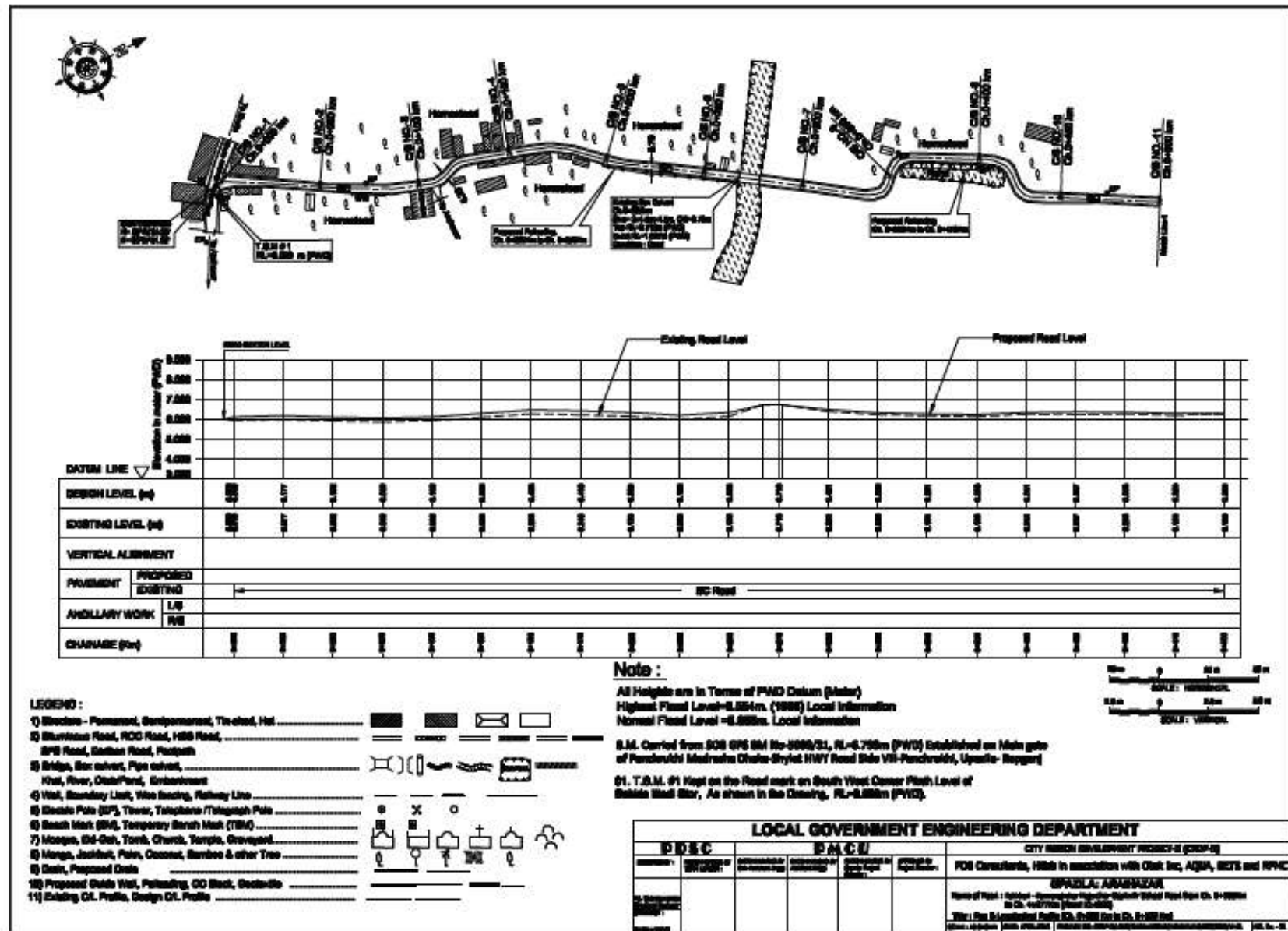
I do hereby declare that all information provided by me in this application are true to the best of my knowledge and no information has been concealed or distorted.

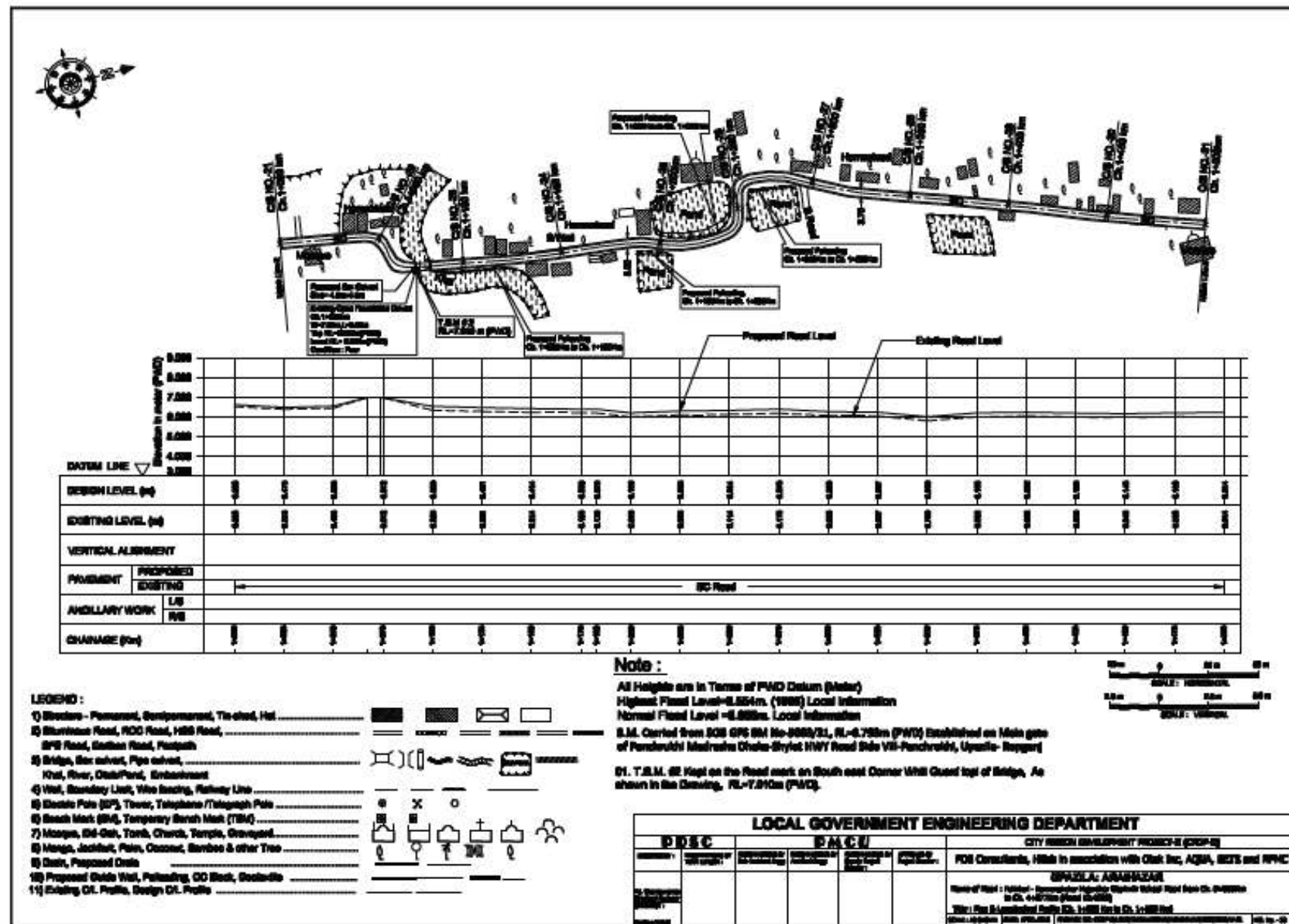
Name and Signature of Entrepreneur

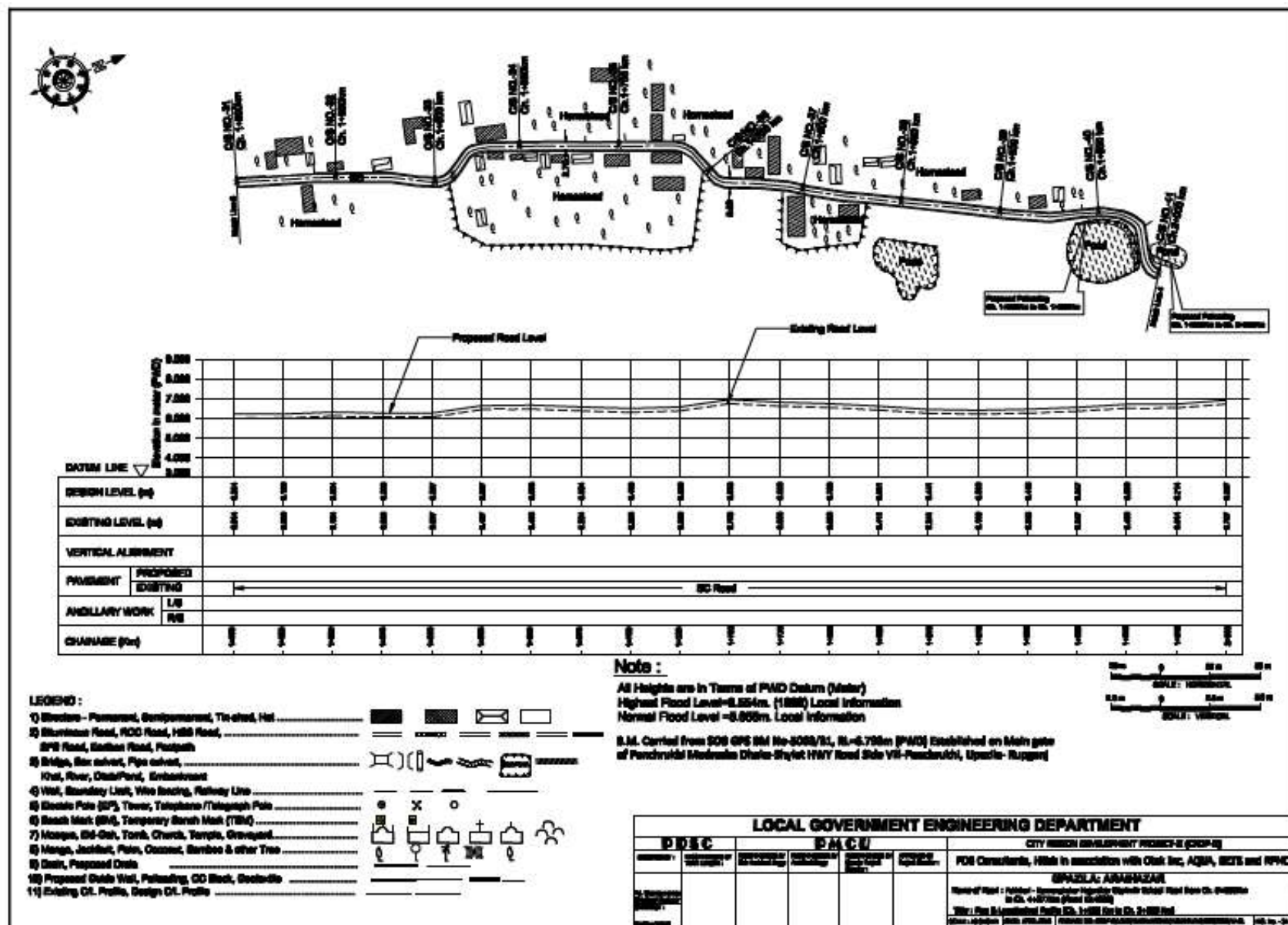
* Each page must be countersigned by the person who fills out this application form and by the entrepreneur.

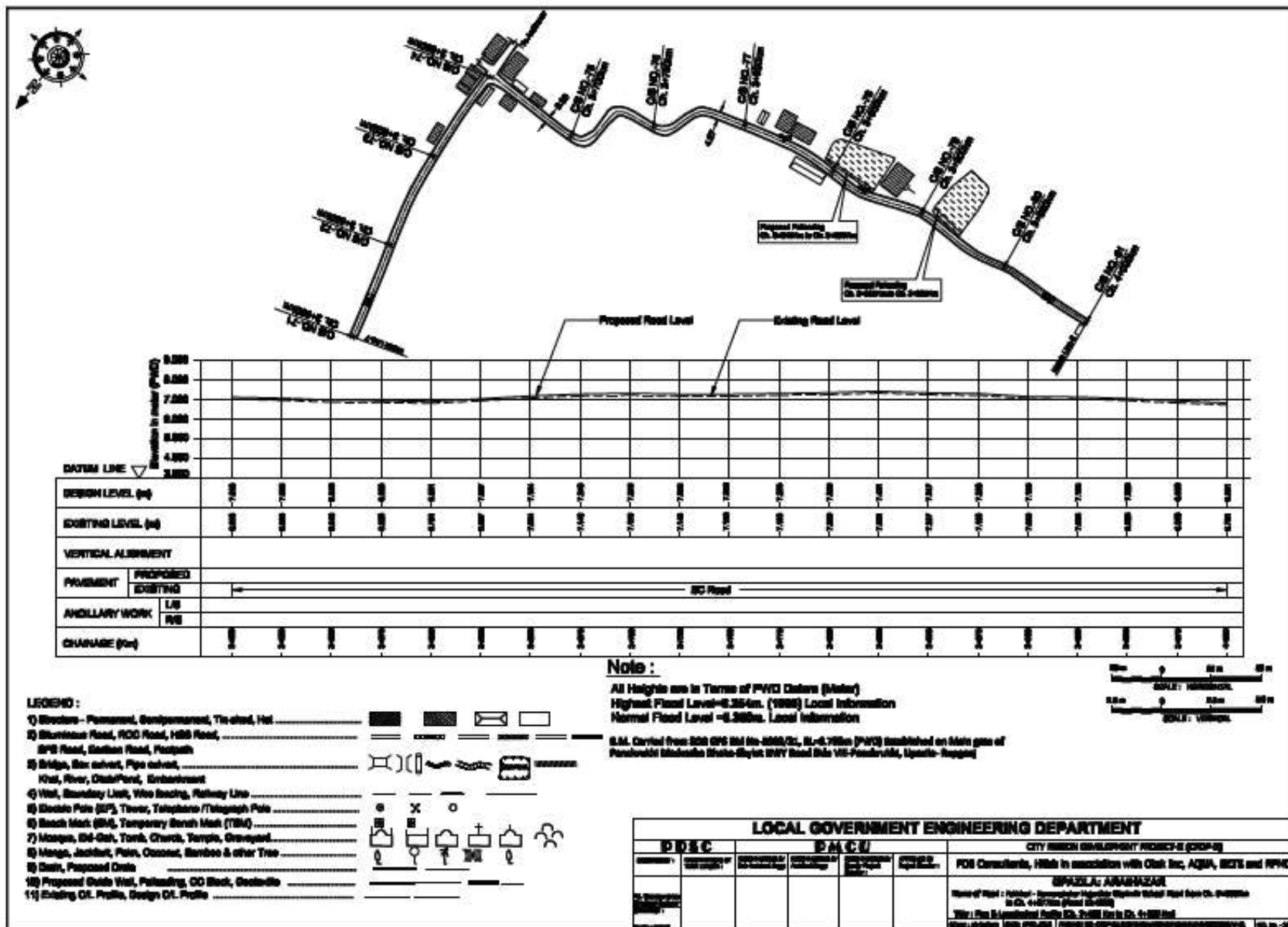


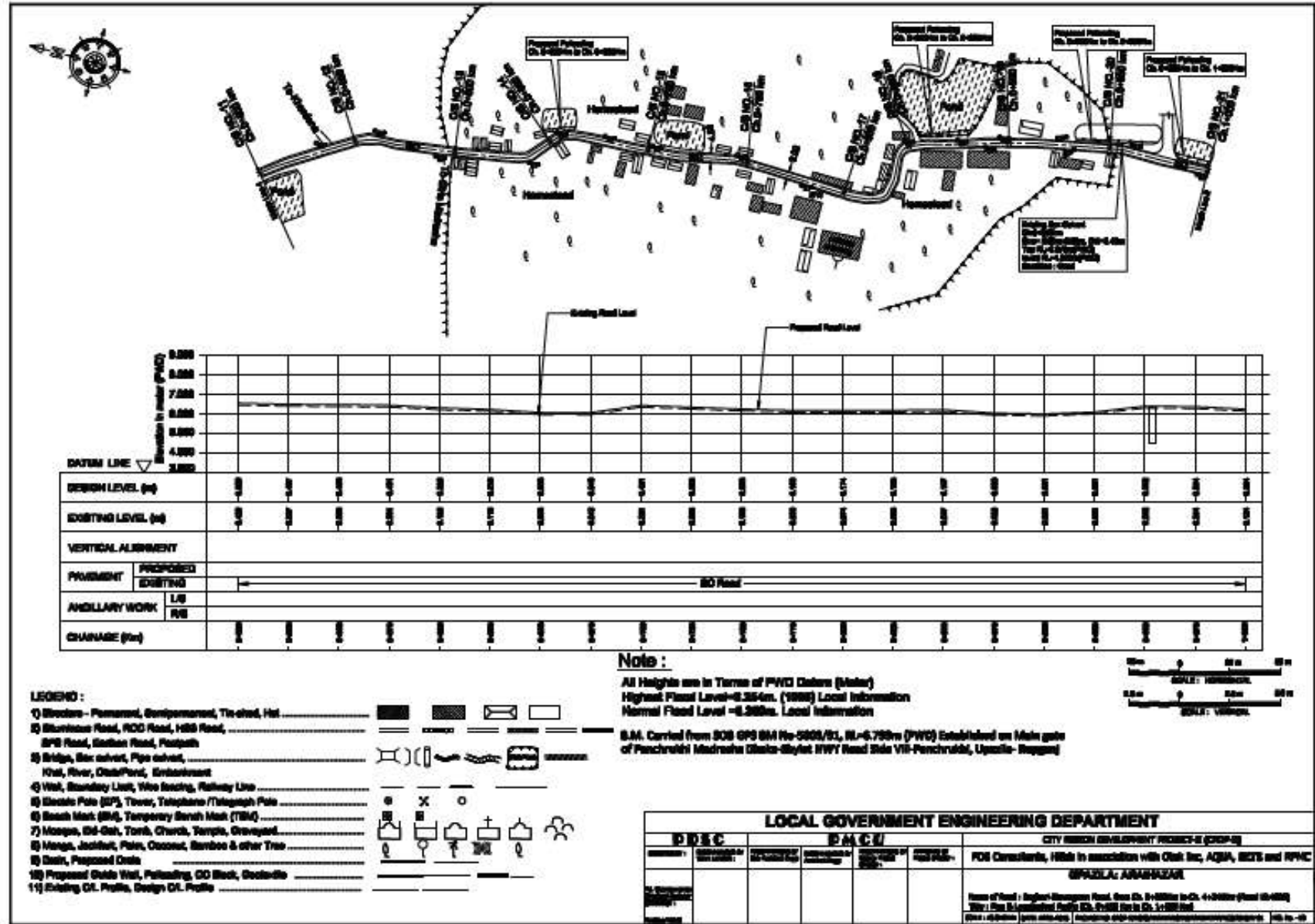


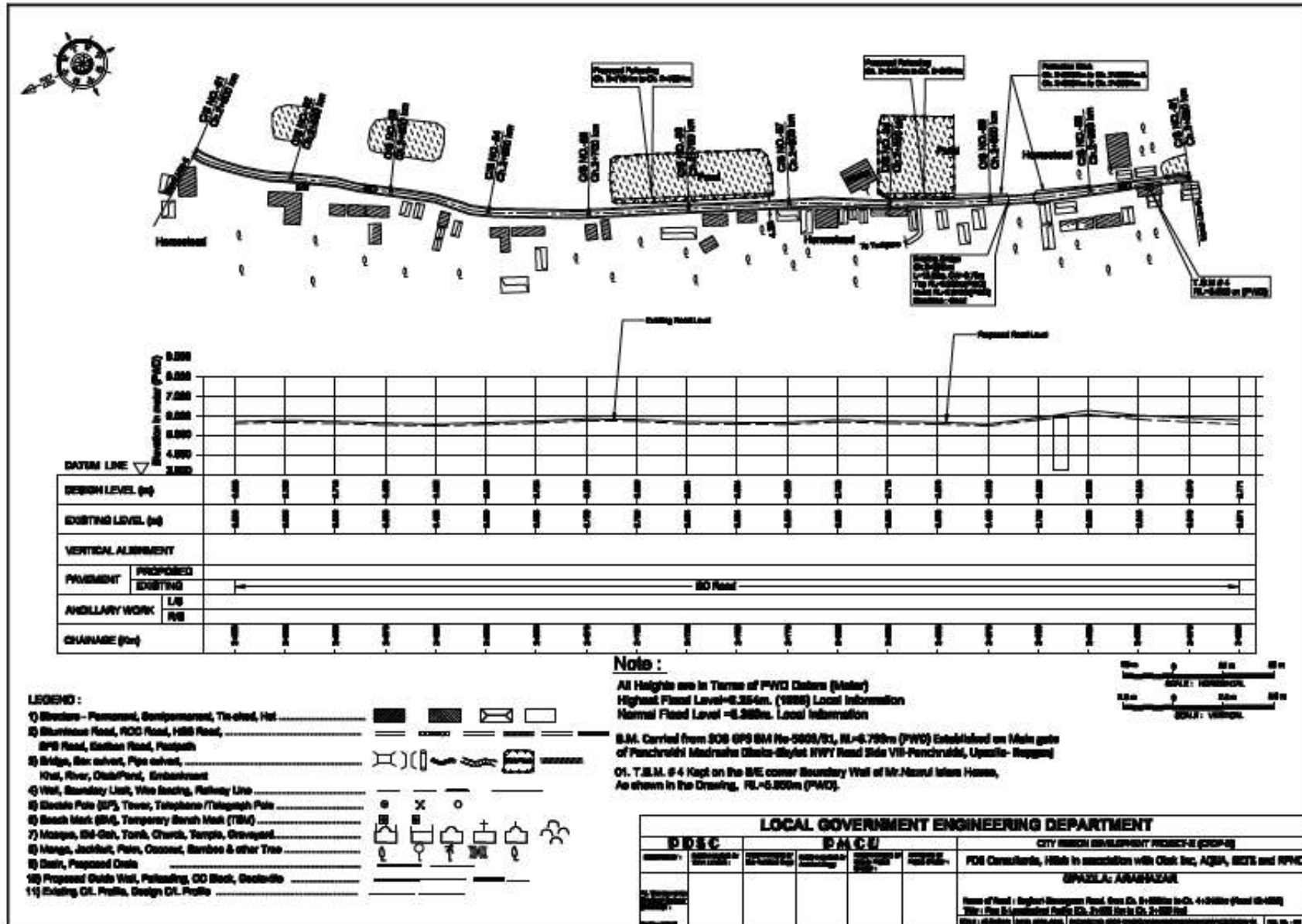


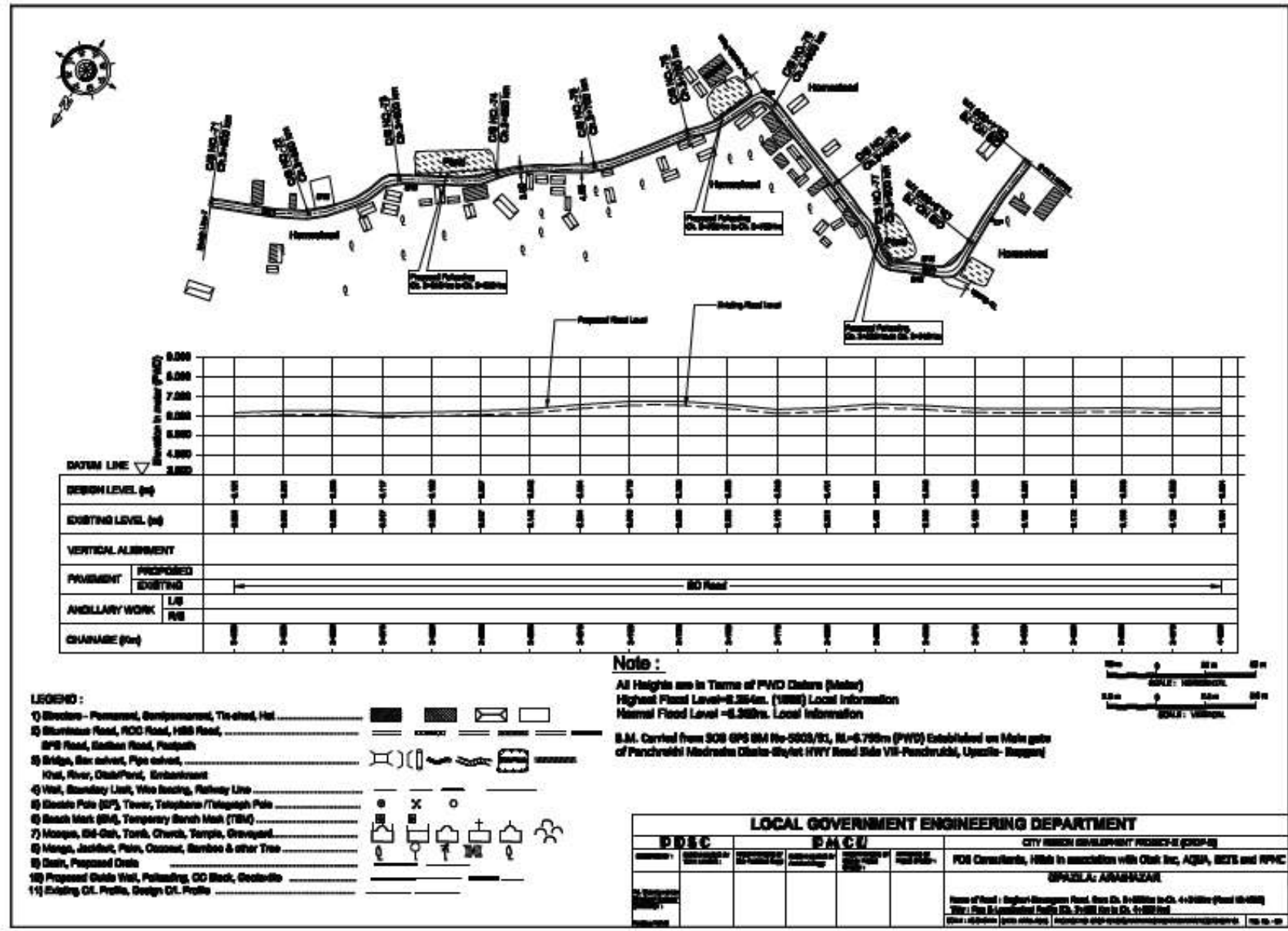


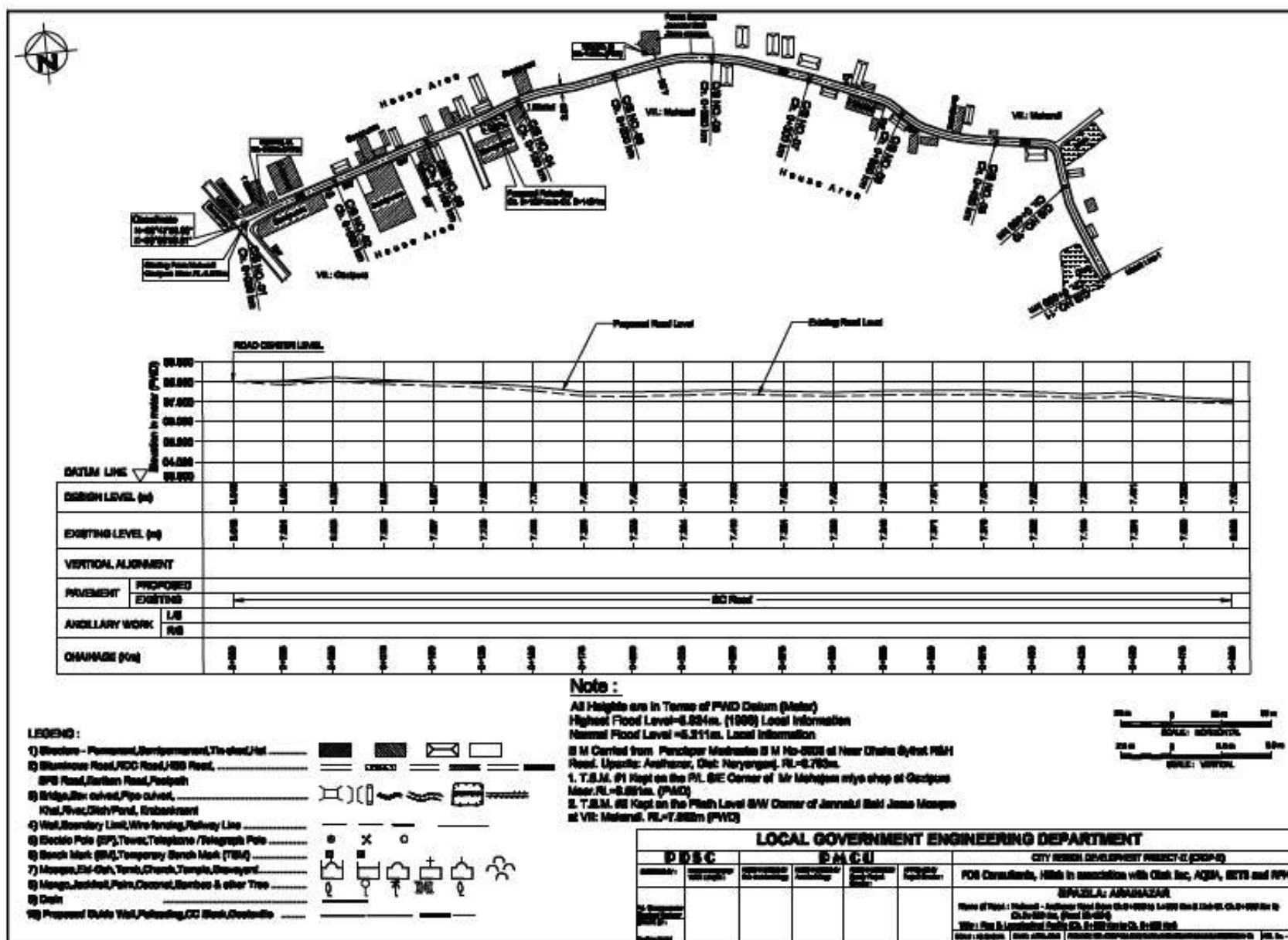


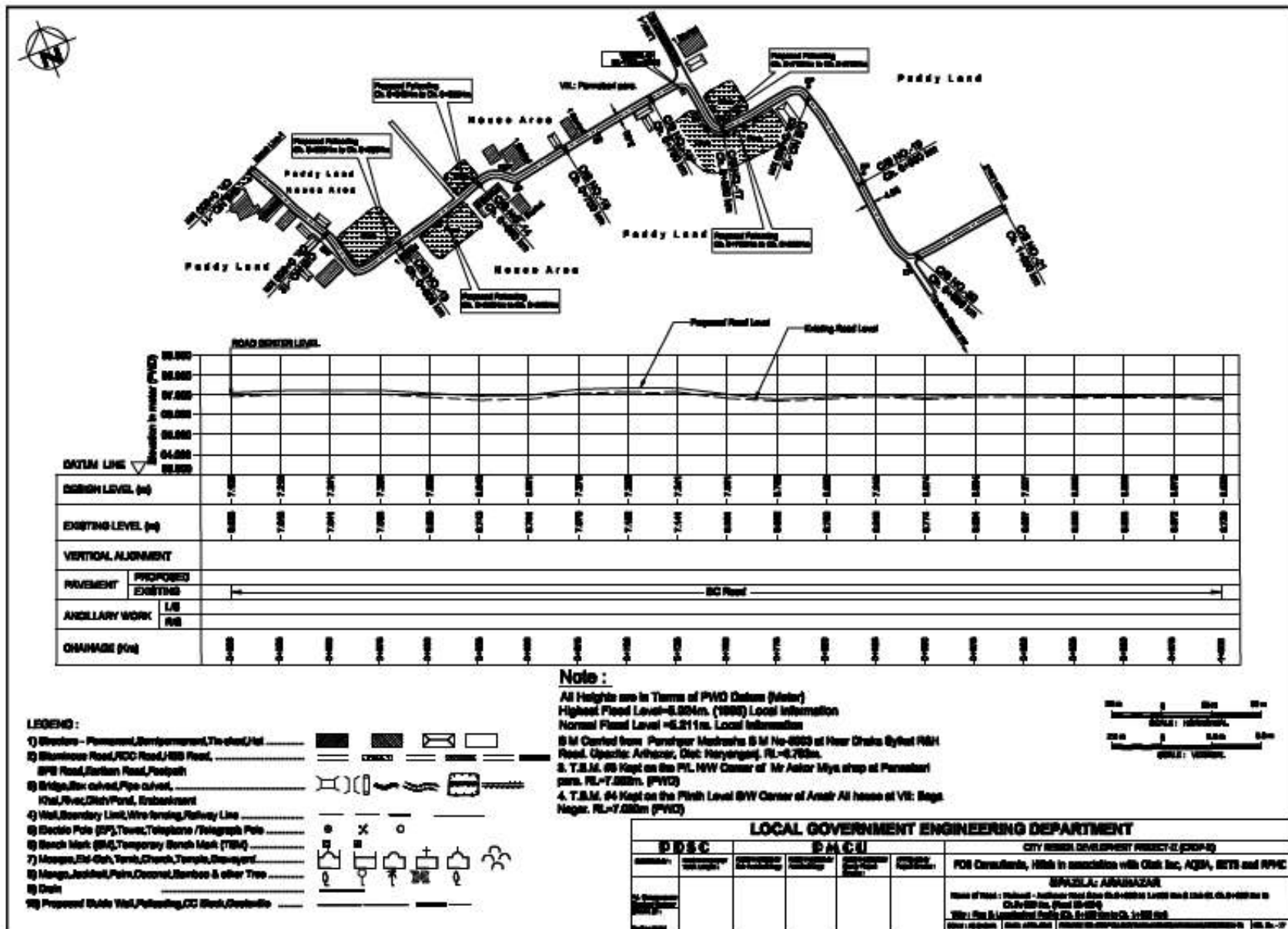


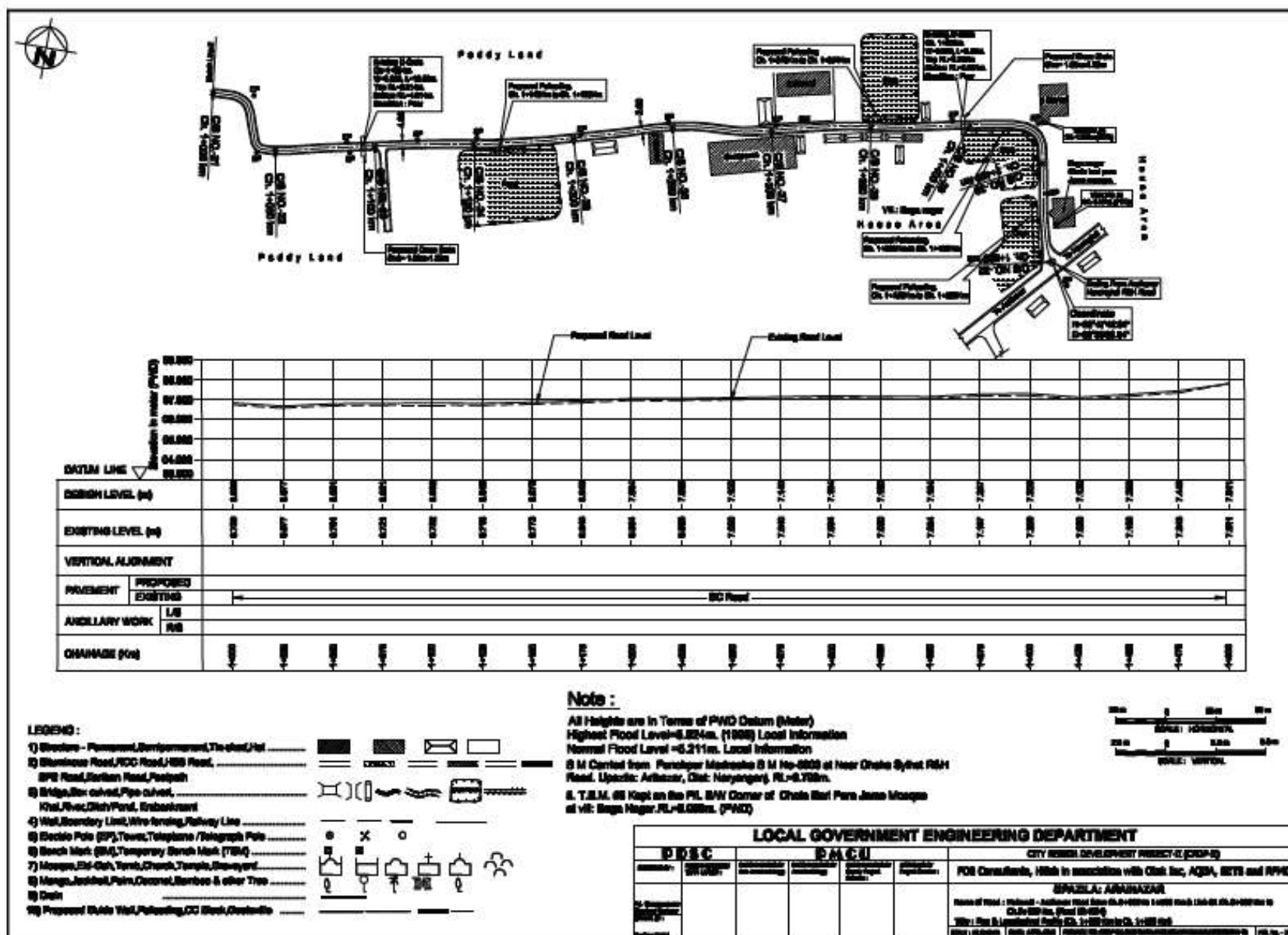












SAMPLE SPOIL MANAGEMENT PLAN

Purpose and Application: Spoil Management Plan (SMP) is to describe how the project will manage the spoil generated and reuse related to design and construction works. This is an integral part of EMP. The objective of SMP is to reuse of spoil from works in accordance with the spoil management hierarchy outlined in this document.

Objectives of Spoil Management Plan: The objectives of SMP are:

- (i) To minimize spoil generation where possible;
- (ii) Maximize beneficial reuse of spoil from construction works in accordance with spoil management hierarchy;
- (iii) Manage onsite spoil handling to minimize environmental impacts on resident and other receivers;
- (iv) Minimize any further site contamination of land, water, soil; and
- (v) Manage the transportation of spoil with consideration of traffic impacts and transport related emissions.

Structure of Spoil Management Plan:

Section 1: Introduction of SMP

Section 2: Legal and other requirements

Section 3: Roles and responsibilities

Section 4: Identification and assessment of spoil aspects and impacts

Section 5: Spoil volumes, characteristics and minimization

Section 6: Spoil reuses opportunities, identification and assessment

Section 7: On site spoil management approach

Section 8: Spoil transportation methodology

Section 9: Monitoring, Reporting, Review, and Improvements

Aspects and potential impacts

The key aspects of potential impacts in relation to SMP are listed in table below:

Aspects	Potential Impacts
Air Quality	Potential for high winds generating airborne dust from the stock piles
Sedimentation	Potential for sediment laden site runoff from spoil stockpiles and potential for spillage of spoil from truck on roads
Surface and groundwater	Contamination of surface and ground water
Noise	Associated with spoil handling and haulage and storage
Traffic	Impacts associated with spoil haulage
Land Use	Potential for spoil to be transported to a that does not have permission for storage/disposal
Design specifications	Limitations on opportunities to minimize spoil generation
Sustainability	Limited sites for storage, reuse opportunities

Spoil volumes, Characteristics and Minimization

Spoil volume calculations: Estimate the volumes of spoils produced from each of the construction sites.

Characterization of spoil: Based on the type of spoil; characterization is done (sand stone, mud mix materials, reusable materials)

Adopt Spoil Reduce, Reuse Opportunities: An overview of the assessment methodology to be used is mentioned below.

- Consideration of likely spoil characteristics
- Identification of possible reuse sites
- Screening of possible reuse opportunities

Identification of possible safe disposal sites for spoil: Those spoils which cannot be reuse shall be properly disposed in designated areas, such disposal areas should be identified in project locations. Such disposal areas should be safe from environmental aspects and there should be any legal and resettlement related issues. Such areas need to be identified and prior cliental approval should be obtained to use it as spoil disposal area. The local administration must be consulted and if required permission should be obtained from them.

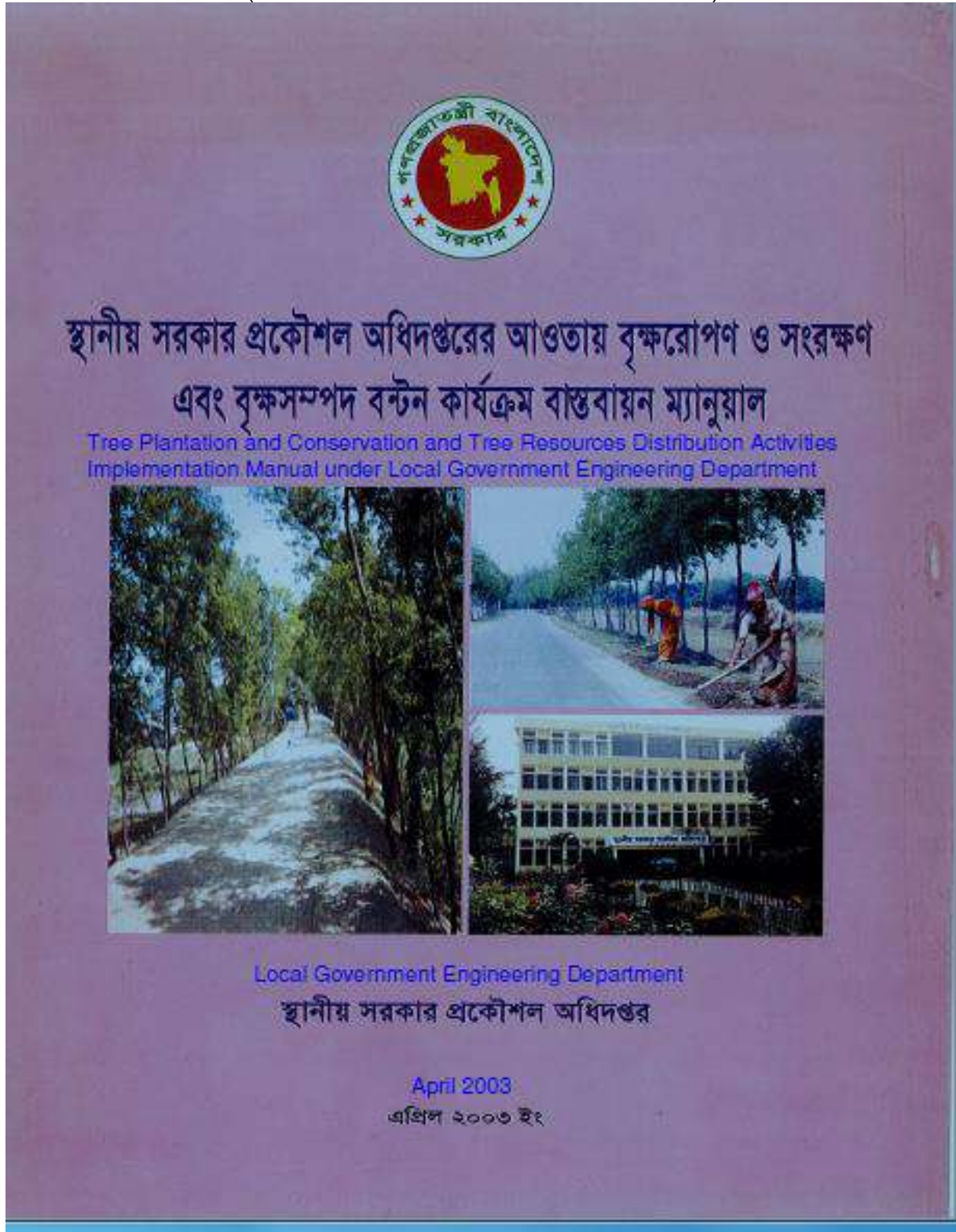
Storage and stock piling Transportation and haulage route

Based on the above, the contractor will prepare a SMP as an integral part of EMP and submit it to the PDSC for their review and approval.

Summary of Key Issues and Remedial Actions

Summary of follow up time-bound actions to be taken within a set timeframe

**LOCAL GOVERNMENT ENGINEERING DIVISION TREE PLANTATION PROGRAM
MANUAL
(COVER PAGE AND TABLE OF CONTENTS)**



Note: Copy of the full manual is available upon request at the PMCU Office.

***Tree Plantation and Conservation and Tree Resources Distribution
Activities Implementation Manual
under
Local Government Engineering Department***

Table of Contents

- 1. Tree Plantation and Conservation In the LGED's Premises and Fallow Land**
 - 1.1 Availability of Land
 - 1.2 Estimate Preparation of Schemes
 - 1.3 Implementation
 - 1.4 Tree Resources Distribution
 - 1.5 Financing
 - 1.6 Implementing Office and Designated Officer
 - 1.7 Responsibility of the Implementing Office's Designated Officer
- 2. Roadside Tree Plantation and Conservation**
 - 2.1 Road Maintenance
 - 2.2 Tree Plantation and Caring
 - 2.3 Road Maintenance , Tree Plantation and Conservation Activities Implementation
 - 2.3.1 Road Maintenance, Tree Plantation and Conservation Scheme Identification, Scheme Preparation, Approval, Financing and Implementation Process
 - 2.3.2 Implementation adopting Lenthperson Process by Organized Women Group
 - 2.3.3 Worker Selection
 - 2.3.4 Worker Selection Policy
 - 2.3.5 Formation of the Interview Board
 - 2.3.6 Campaign
 - 2.3.7 Interviewing and Selection
 - 2.3.8 Team Formation
 - 2.3.9 Responsibility of Women Worker
 - 2.3.10 Responsibility of Co- women group Leader
 - 2.3.11 Responsibility of Women group Leader
 - 2.3.12 Recruitment of Supervisor
 - 2.3.13 Provide Appointment Letters
 - 2.3.14 Provide Equipments among Worker Women for Maintenance Work
 - 2.3.15 Initiation of Implementation of Scheme
 - 2.4 Training
 - 2.4.1 General Awareness Training for Women Workers on Road Maintenance, Plantation and Conservation
 - 2.4.2 General Awareness Training for Women Workers on Primary Health Care and Income-generating Activities
 - 2.5 Inspection and Monitoring
 - 2.5.1 Inspection and Monitoring System of Road Maintenance, Plantation and Conservation Program

- 2.6 Wage
 - 2.6.1 Wage Fixation
 - 2.6.2 Bank Account
 - 2.6.3 Wage Payment
 - 2.6.4 Compulsory Savings
- 2.7 Distribution of Income from Trees
 - 2.7.1 Tree Resources Distribution System
 - 2.7.2 Template: Tree Resources Distribution
 - 2.7.3 Contract signed for Distribution of Tree Resources among different parties according to the Adopted Policy
 - 2.7.4 Monitoring the Implementation of the Contract
- 2.8 Financing
 - 2.8.1 Source of Funding for the Program
 - 2.8.2 Financing Process
- 2.9 Description of Responsibility of Representatives of Local Government Organizations and of LGED Officials in the Implementation of Road Maintenance (off-pavement), Plantation and Conservation Program
 - 2.9.1 Responsibility of Union Parishad (UP)
 - 2.9.2 Responsibility of UP Male/Female Member
 - 2.9.3 Responsibility of UP Chairman
 - 2.9.4 Responsibility of Upazila Parishad
 - 2.9.5 Responsibility of Upazila Executive/Nirbahi Officer (UNO)
 - 2.9.6 Responsibility of LGED's Community Organizer (CO)
 - 2.9.7 Responsibility of Sub-Assistant Engineer
 - 2.9.8 Responsibility of Upazila Engineer (UE)
 - 2.9.9 Responsibility of LGED's Executive Engineer (Training)
 - 2.9.10 Responsibility of LGED's District Executive Engineer
- 3. Tree Plantation at Embankment and Canal Bank and their Conservation
 - 3.1 Selection of Proposals for Tree Plantation and Conservation at Embankment Slope and Canal Bank
 - 3.2 Implementation
 - 3.3 Selection of Tree Species
 - 3.3.1 Tree planting Distance
 - 3.3.2 Tree Sapling Planting Method
 - 3.3.3 Tree Caring and Prohibition
 - 3.3.4 Inspection and Monitoring
 - 3.4 Wages
 - 3.5 Financing
 - 3.6 Implementing Agency
 - 3.7 Tree Resources Distribution
 - 3.8 Distribution of Money from Sale of Trees Grown at Embankment Slope and Canal Bank

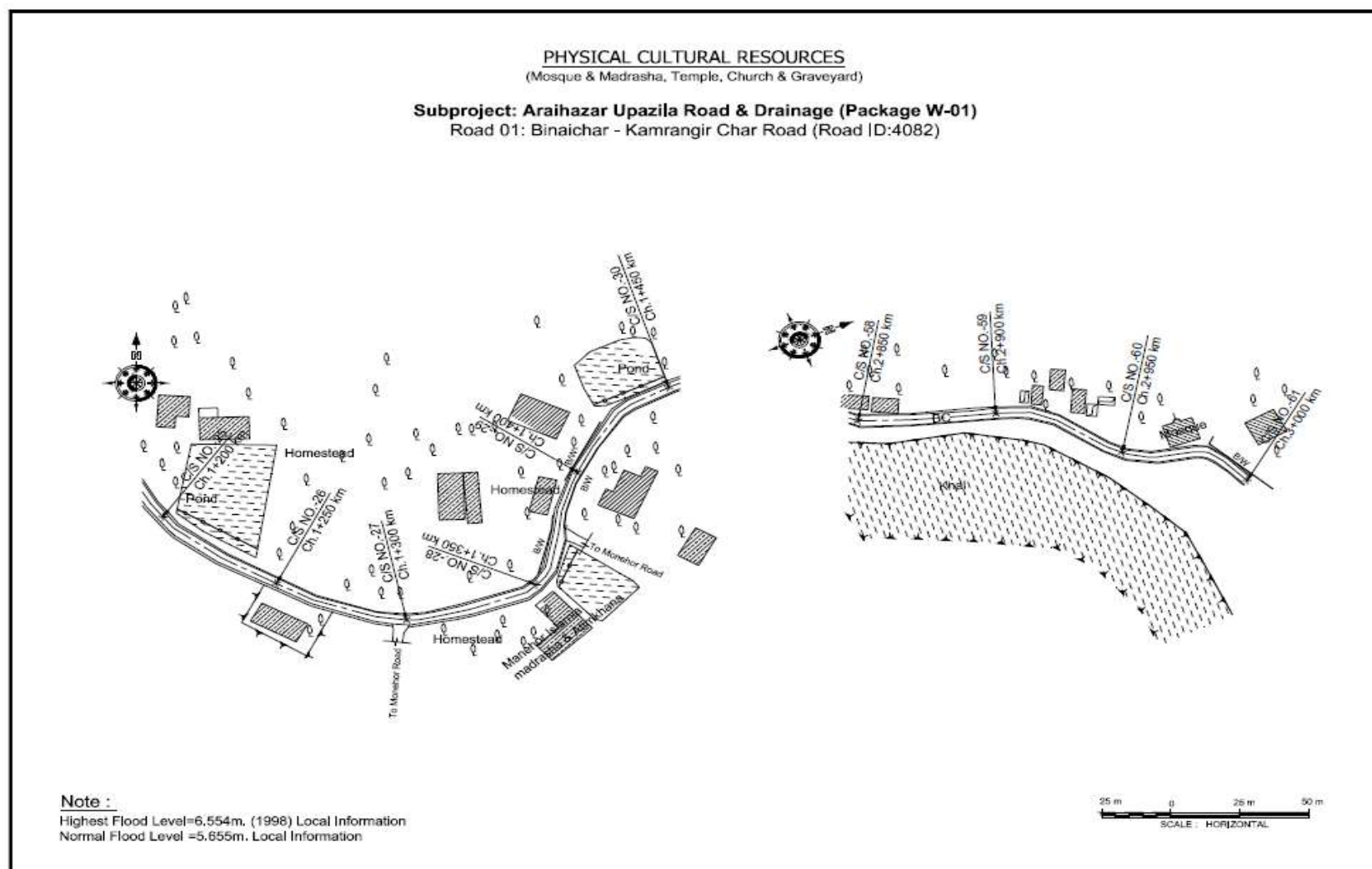
Annexures**A) Road**

Road/Annex – 1:	Tree Species Selection, Tree Plantation and Caution in
Road/Annex – 2:	Method of Tree Sapling Plantation
Road/Annex – 3:	Points Value for Priority Ranking
Road/Annex – 4:	Technical Report
Road/Annex – 5:	Format for Cost Estimate
Road/Annex – 6:	Appointment Letter of Women Worker
Road/Annex – 6a:	Appointment Letter of Supervisor
Road/Annex – 7:	Women Worker's acceptance Letter for Working Tools for Road Maintenance, Tree Plantation and Conservation Scheme
Road/Annex – 8:	Regular Road Maintenance and Tree Care Monitoring Register
Road/Annex – 8a:	Work Code and Description
Road/Annex – 8b:	Daily Activity Report of Regular Maintenance Work done by Women Worker
Road/Annex – 9:	Monthly Monitoring of Regular Road Maintenance and Tree Care
Road/Annex – 10:	Monthly Monitoring Summary Report
Road/Annex – 11:	Tree Resources Distribution Agreement

B) Embankment

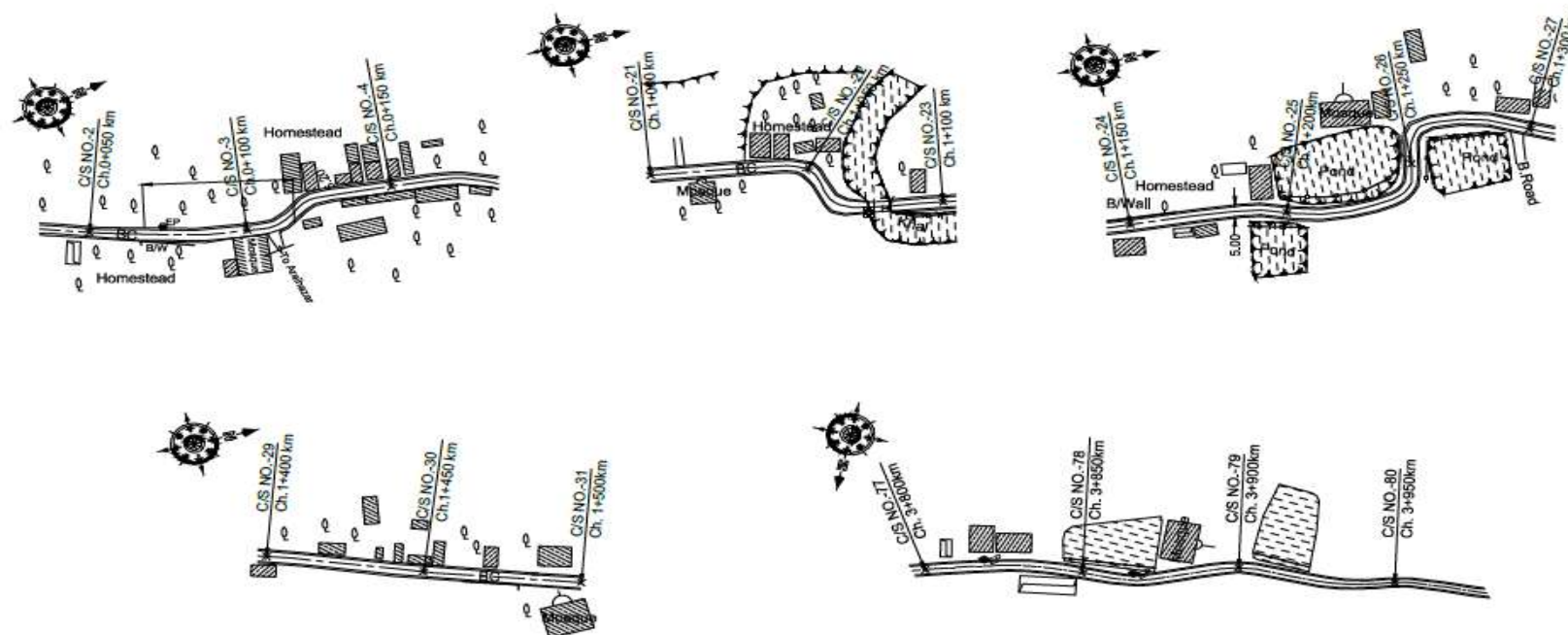
Embankment/Annex- 1:	Proposal of Plantation at Embankment Slope and Canal Bank
Embankment/Annex- 2:	Schedule 1
Embankment/Annex- 3:	Executable at a Non-Judicial Stamp of Value of Taka 150.00
Embankment/Annex- 4:	Contractor's Responsibility and Condition of Recruitment
Embankment/Annex- 5:	Sample – Method of Tree Plantation at Embankment Slope
Embankment/Annex- 6:	Template of Monthly Proress Report

STRIP MAPS SHOWING PCRS (RELIGIOUS ESTABLISHMENTS) ALONG THE ROAD ALIGNMENTS



PHYSICAL CULTURAL RESOURCES
(Mosque & Madrasha, Temple, Church & Graveyard)

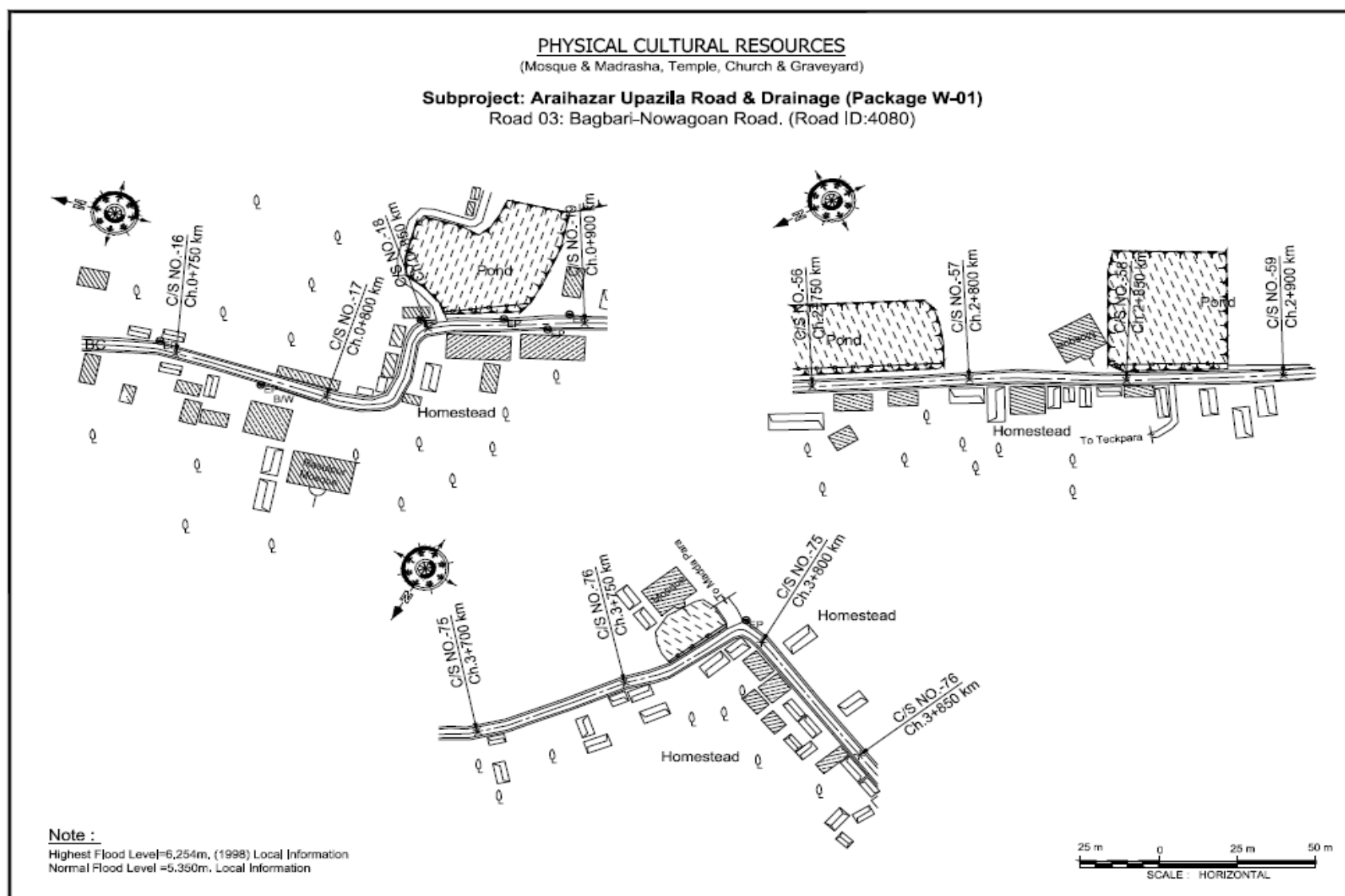
Subproject: Araihasar Upazila Road & Drainage (Package W-01)
Road 02: Fakirbari - Kamrangirchar Majerchar Gopindir School Road (Road ID:4083)

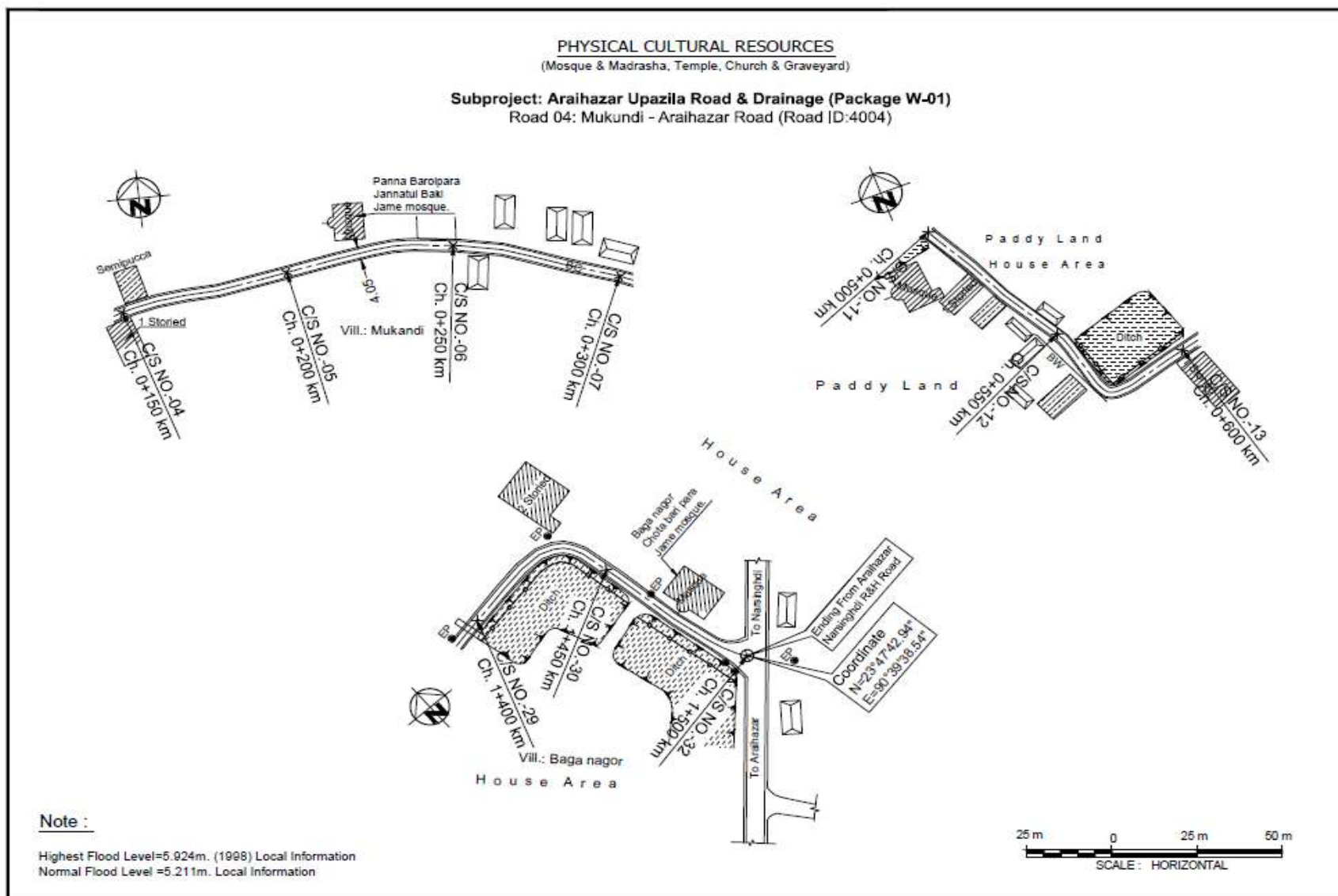


Note :

Highest Flood Level=6.554m. (1998) Local Information
Normal Flood Level =5.655m. Local Information







PUBLIC CONSULTATION

Details of date, time, location, type of participants and discussed issues are presented in a tabular form below:

Sl. No	Date of Consultation	Road & Place of consultation	Number & Type of Participants	Issues Discussed
01	12 March 2018	For a) Binairchar to Kamrangirchari improvement of road - at a roadside school	15 (Councilors, Retired Govt. Officials, Local Elite, Businessmen, project beneficiaries etc.)	General perception about the project and the awareness about the proposed project are disseminated in the meeting. The following predefined issues are discussed in the consultation meetings: <ul style="list-style-type: none"> • Information dissemination about the subproject
02.	13 March 2018	b) Fakirbari to Kamrangirchar Majerchar gopindir school road - t a roadside school	14 (Councilors, Retired Government Officials, Local Elite, Businessmen, project beneficiaries etc.)	<ul style="list-style-type: none"> <input type="checkbox"/> possible impacts of the subproject <input type="checkbox"/> participation of local people in different project activities <input type="checkbox"/> Employment potential for local people in the project works <input type="checkbox"/> Loss of residential/commercial structures, if any due to the project <input type="checkbox"/> Resettlement and land acquisition (if foreseen specially on private land).
03	13 March 2018	c) Bagbari to Nowgoan road - at Somajkollyan bazar	20(Councilors, Businessmen, Local Elites, Beneficiaries Service holders etc.)	<ul style="list-style-type: none"> • Impact on social issues due to the project • Protected areas (national park, protected forest, religiously sensitive sites, historical or archaeological sites), if any
04.	13 January 2018	d) Mukindi to Araihasar - at a road side bazaar	10(Councilors, Retired Govt. Officials, Local Elite, Businessmen, project beneficiaries, etc.)	<ul style="list-style-type: none"> • Any critical issue or concern by the local people regarding the project? • Grievances redress mechanism etc.

Finding in the public consultation meeting

- Local people will support the project activities.
- The main issue arising from the consultation is that the people of this area suffering huge traffic congestion due to movement of heavy container truck. They cannot easily move to the school, hospital, and their working place from their due to congestion. Peoples will be benefitted who are residing alongside the road of area if the project will undertake.
- The area is dominating business area about 70% are depends on business and the

rest service and cultivations.

- During construction period short term community activities will be affected.
- No resettlement and land acquisition required for due to the project, only compensation need for the unauthorized shop and residence.
- There is no protected area in and around the project area.
- The project will never impact on natural water body and not contaminate the soil resources.
- The NGOs within the areas are: ASA, BRAC, Grameen Bank, Karitas, MSS, ODC, UPPR, JIZ, Gonosasto, etc.
- It assured by the participant, that they will welcome the project, and will support/cooperate in all stages of the project works.

List of Participants

ফোকাস গ্রুপ আলোচনায় অংশ গ্রহণকারীর হাজিরা
Binairchar to Kaurangir Char (LRA3)

ক্রমিক সংখ্যা	নাম ও ঠিকানা	পেশা/পদবী	স্বাক্ষর
১।	মধু রঞ্জন কল ০১৪২২২৩৩০০	ব্যবসায়	মধু রঞ্জন কল
২।	মোঃ মাহমুদ ০১৬২১৫৫৫৪৩৭	সি.এম. ডি চলোফ	মাহমুদ
৩।	মোঃ মাহমুদ আলোফ ০১৭৫৬৭৭৭৩৩৫	সি.এম. ডি চলোফ	মাহমুদ
৪।	মুন্না মোহাম্মদ ০	কৃষক	মুন্না মোহাম্মদ
৫।	মুন্না মোহাম্মদ মোহাম্মদ মুন্না মোহাম্মদ ০১৭৬০৪৫০৬৫		
৬।	মুন্না মোহাম্মদ	ব্যবসায়	
৭।	মুন্না মোহাম্মদ ০১৭৬৬১৬৩১৬১	সি.এম. ডি মুন্না মোহাম্মদ	মুন্না মোহাম্মদ
৮।	মুন্না মোহাম্মদ ০১৭৭৭০২২৪৬৭	মুন্না মোহাম্মদ	মুন্না মোহাম্মদ
৯।	মুন্না মোহাম্মদ ০১৭১২৬৩৫৪১৮	মুন্না মোহাম্মদ মুন্না মোহাম্মদ	মুন্না মোহাম্মদ
১০।	মুন্না মোহাম্মদ ০১৭৪৬১৫৩৭৭৪	ব্যবসায়	মুন্না মোহাম্মদ

ফোকাস গ্রুপ আলোচনায় অংশ গ্রহণকারীর হাজিরা
AKIR BARI to KAMRANGIRCHAR (LRA4)

ক ট	নাম ও ঠিকানা	পেশা/পদবী	স্বাক্ষর
	আঃ-মোমেন হুইশ	কাজম	(মুহম্মদ হুইশ) 01715009800 -
	আব্দুল	ব্যক্তিগত	01713507266
	মহিমা কামরান	কমিউনিকেশন	01766636720
	ডে. মোহাম্মদ হুইশ	কাজম	01713603923 ২৬
	আব্দুল মোমেন হুইশ	কাজম	01769398080
	আব্দুল মোমেন হুইশ	কাজম	01736039253 ২৬
	আব্দুল মোমেন	কাজম	01938998600
	ডে. সুজন	চাকরি করে	0191X-504184
	আব্দুল	কাজম	01728927239
	আব্দুল	কাজম	01710587496

Joagandan Kundu to Aradipura (LRA7)

ক	নাম ও ঠিকানা	পেশা/পদবী	স্বাক্ষর
১	মে. মনুদ মিয়া 01727873142	কর্মী	MANU
	হুসেন	স্বামী (ভে)	N/A
	মে. মনির কান্ত 01839955452	কর্মী	Manir
	মামুন 01789031107	স্বামী (ভে)	MAMUN
	মে. মনির হোসেন 01883026890	দোকানদার	মনি হোসেন
	মে. মুহাম্মদ আলী N/A	স্বামী (ভে)	MUHAMMAD ALI
	মে. ম. মনুদ মিয়া 01828133612	কর্মী	malek
	মে. মনুদ মিয়া 01727504942	স্বামী (ভে)	MANU
	মে. মনির 01818393039	কর্মী	MANIR
	মনির (মামুন)	স্বামী (ভে)	

Photographs of Community Consultations



Consultation at LRA 3



Consultation at LRA4



Consultation at LRA 5



Consultation at LRA7

SAMPLE GRIEVANCE REGISTRATION FORM

(To be available in Bangla and Other Local Language, if any)

The _____ Project welcomes complaints, suggestions, queries and comments regarding project implementation. We encourage persons with grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback.

Should you choose to include your personal details but want that information to remain confidential, please inform us by writing/typing ***(CONFIDENTIAL)*** above your name. Thank you.

Date	Place of registration				
Contact Information/Personal Details					
Name		Gender	<input type="checkbox"/> Male <input type="checkbox"/> Female	Age	
Home Address					
Village / Town					
District					
Phone no.					
E-mail					
Complaint/Suggestion/Comment/Question Please provide the details (who, what, where and how) of your grievance below: If included as attachment/note/letter, please tick here:					
How do you want us to reach you for feedback or update on your comment/grievance? <div style="height: 100px; border: 1px solid black;"></div>					

FOR OFFICIAL USE ONLY

Registered by: (Name of Official registering grievance)	
Mode of communication: <input type="checkbox"/> Note/Letter <input type="checkbox"/> E-mail <input type="checkbox"/> Verbal/Telephonic	
Reviewed by: (Names/Positions of Official(s) reviewing grievance)	
Action Taken:	
Whether Action Taken Disclosed:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Means of Disclosure:	

SUGGESTED TEMPLATE FOR RECORD-KEEPING OF GRIEVANCES

[illegible]

INDICATIVE TERMS OF REFERENCE FOR SAFEGUARDS SPECIALIST FOR PMCU, PIUS AND PDSC

A. Preparation, Design, and Supervision Consultants (PDSC)

1. Environmental Safeguards Specialist (National)

1. **Experience.** A civil engineer with specialization in environment, having at least 5-10 years of working experience related to the integration of environmental issues in design, and construction of infrastructure projects. Past experience working on donor projects preferable.

2. Detailed Tasks:

- (i) Prepare Initial Environmental Examination (IEE) in accordance with the Environmental Assessment Review Framework (EARF) for subprojects;
- (ii) Assist PMCU Environment Officer in ensuring prepared IEEs are submitted to ADB for review;
- (iii) Assist PMCU in ensuring approved IEEs are disclosed on PMCU/LGED website;
- (iv) Ensure approved final IEEs and Environmental Management Plans (EMPs) are included in contract documents;
- (v) Assist PMCU in ensuring compliance of the project and its subprojects with all relevant national laws;
- (vi) Interact with the sector specialists and integrate environmentally sound practices into the detailed design of project components;
- (vii) Work out the site-specific mitigation and adaptation measures for components as required and integrate the same into contractual provisions;
- (viii) Assist the international environment/Climate Change specialist in environmental training programs and workshops for the staffs of the PMCU, PIU and contractors and in accordance to the Capacity Building Program;
- (ix) Prepare activity plans as identified in IEE (includes site management plans, waste management plans, sludge management and disposal plans, occupational safety plans, etc.);
- (x) Assist PIU in reviewing the contractors' SEMP to ensure compliance with the IEE/EMP;
- (xi) Assist PIU in supervising the implementation of the EMP and SEMP by the contractors;
- (xii) Assist PIU in preparing quarterly environmental monitoring reports and submit to PMCU;
- (xiii) Review site specific environmental enhancement/mitigation designs worked out by the contractor and assist PIU in approving such designs;
- (xiv) Assist in providing occupational health and safety training for contractors' personnel before commencement of civil works for all sub-projects;
- (xv) Assist the PMCU environment officer in preparing semi-annual environmental monitoring reports and submit to ADB;
- (xvi) Establish dialogue with the affected communities and ensure that the environmental concerns and suggestions are incorporated and implemented in the project;
- (xvii) Assist PMCU and PIUs in attending to or facilitating responses to any public grievances per GRM; and
- (xviii) Assist in any other task assigned by the PMCU Environment Officer and/or supervising consultant in relevance to effective project implementation.

B. Project Management Coordination Unit

1. Environmental Safeguards Officer – PMCU

1. **Experience.** An Environmental Engineer / scientist with experience in management of environmental issues of infrastructure projects and understanding of the regulatory framework for environmental management in Bangladesh.

2. Detailed Tasks:

- (i) Ensure the conformance of all Subprojects proposed under the project to the regulatory compliance to the Government, with reference to environmental requirements, with support from the Environmental Officer of the PIUs. This shall include preparation of the documents as required under the Environmental Conservation rules, submission of application forms, and obtaining clearances from the DOE; and ensuring conformance to the clearance conditions laid down in the clearances for the Subprojects by the DOE;
- (ii) Liaise with the various Government agencies on environmental and other regulatory matters pertaining to implementation of the subprojects;
- (iii) Work closely with the PIUs and provide guidance on the shifting of utilities and services, including obtaining necessary clearances from the respective line agencies, prior to award of civil works contracts;
- (iv) Provide support and assistance to the Government Agencies and the Asian Development Bank to supervise the implementation of the IEE during the construction as well as operation stage of the project;
- (v) Monitor construction activities to ensure that identified and appropriate control measures are effective and in compliance with the IEE and advise PIUs for compliance with statutory requirements;
- (vi) Work in close co-ordination with the Social Safeguards officer of the PMCU and participate in the Grievance Redressal Mechanism for all grievances that are brought forward to the PMCU. Monitor on a continuous basis the effective functioning of the Grievance mechanisms at the PIU and *pourashava* levels on all grievances related to environmental issues; and
- (vii) Jointly (with the environmental engineer of the PMCU), review the environmental performance of the project through an assessment of the periodic environmental monitoring reports submitted by the PDSC; provide a summary of the same to the Project Director, and initiate necessary follow-up actions.

1. Environmental Engineer - PMCU

1. **Experience.** A Civil Engineer with specialization in Environment with experience in implementation of environmental management plans of infrastructure projects, especially those funded by donor agencies.

2. Detailed Tasks.

- (i) Review the IEE Document and contract clauses and ensure adequacy under ADB's Environmental Assessment Guidelines, 2003 and the updated Safeguards Policy Statement, 2009 and identify any areas for improvement;
- (ii) Ensure that the subproject design and specifications adequately reflect the IEE;
- (iii) Monitor construction activities to ensure that identified and appropriate control

- measures are effective and in compliance with the IEE;
- (iv) Review and approve the Contractor's Implementation Plan for the environmental measures, as per IEEs/EMPs;
- (v) Liaise with the Contractors and Consultants on the implementation of the Environmental management measures proposed in the IEE/EMP;
- (vi) Jointly (with the environmental safeguards officer of the PMCU), review the environmental performance of the project through an assessment of the periodic environmental monitoring reports submitted by the PDSC; provide a summary of the same to the Project Director, and initiate necessary follow-up actions; and
- (vii) Document the good practices in the project, with support from Environmental Specialists of the PDSC and PIU on (a) incorporation and integration of environmental issues into engineering design and (b) on implementing environmental measures in the construction, and dissemination of the same.

C. Project Implementation Unit

1. Environmental Officer – Project Implementation Unit

1. Experience. A civil engineer with working experience related to the integration of environmental issues in design, and construction of infrastructure projects.

2. Detailed tasks:

- (i) Support the Environmental Safeguards officer of the PMCU towards ensuring the conformance of the subproject to the regulatory compliance to the Government, with reference to environmental requirements; including preparation of documents required for clearances, obtaining clearances from the divisional office of the DOE, etc.;
- (ii) Work with the PDSC Environmental Specialists in the preparation of the Environmental Safeguards Documents; including integration of environmental provisions into the contract provisions of the respective subprojects;
- (iii) With support of the PMCU and PDSC Environmental Specialists, monitor compliance of the implementation of the environmental provisions; and ensure that identified control measures are effective and in compliance with the IEE;
- (iv) Review and approve the Contractor's Implementation Plan for the environmental measures, as per IEEs/EMPs;
- (v) Liaise with the Contractors and Consultants on the implementation of the Environmental management measures proposed in the IEE/EMP; including the implementation of the environmental monitoring plan outlined in the IEE;
- (vi) Establish dialogue with the affected communities and ensure that the environmental concerns and suggestions are incorporated and implemented in the project;
- (vii) Participate in the Grievance redressal of all grievances pertaining to environment and support the PIU/*pourashava* in redressal of the same;
- (viii) Prepare and submit environmental monitoring and implementation progress reports with support from PDSC consultants, to the PMCU; and
- (ix) Assist Environmental Specialist of the PMCU to prepare good practice dissemination notes based on the experience gained from site supervision.

TRAFFIC MANAGEMENT PLAN TEMPLATE

A. Principles

1. One of the prime objectives of this traffic management plan (TMP) is to ensure the safety of all the road users along the work zone, and to address the following issues:

- the safety of pedestrians, bicyclists, and motorists travelling through the construction zone;
- protection of work crews from hazards associated with moving traffic;
- mitigation of the adverse impact on road capacity and delays to the road users;
- maintenance of access to adjoining properties; and
- Avoid hazards in addressing issues that may delay the project.

B. Operating Policies for Traffic Management Plan

2. The following principles will help promote safe and efficient movement for all road users (motorists, bicyclists, and pedestrians, including persons with disabilities) through and around work zones while reasonably protecting workers and equipment.

- Make traffic safety and temporary traffic control an integral and high-priority element of every project from planning through design, construction, and maintenance;
- Inhibit traffic movement as little as possible;
- Provide clear and positive guidance to drivers, bicyclists, and pedestrians as they approach and travel through the temporary traffic control zone;
- Inspect traffic control elements routinely, both day and night, and make modifications when necessary;
- Pay increased attention to roadside safety in the vicinity of temporary traffic control zones;
- Train all persons that select, place, and maintain temporary traffic control devices;
- Keep the public well informed; and
- Make appropriate accommodation for abutting property owners, residents, businesses, emergency services, railroads, commercial vehicles, and transit operations.

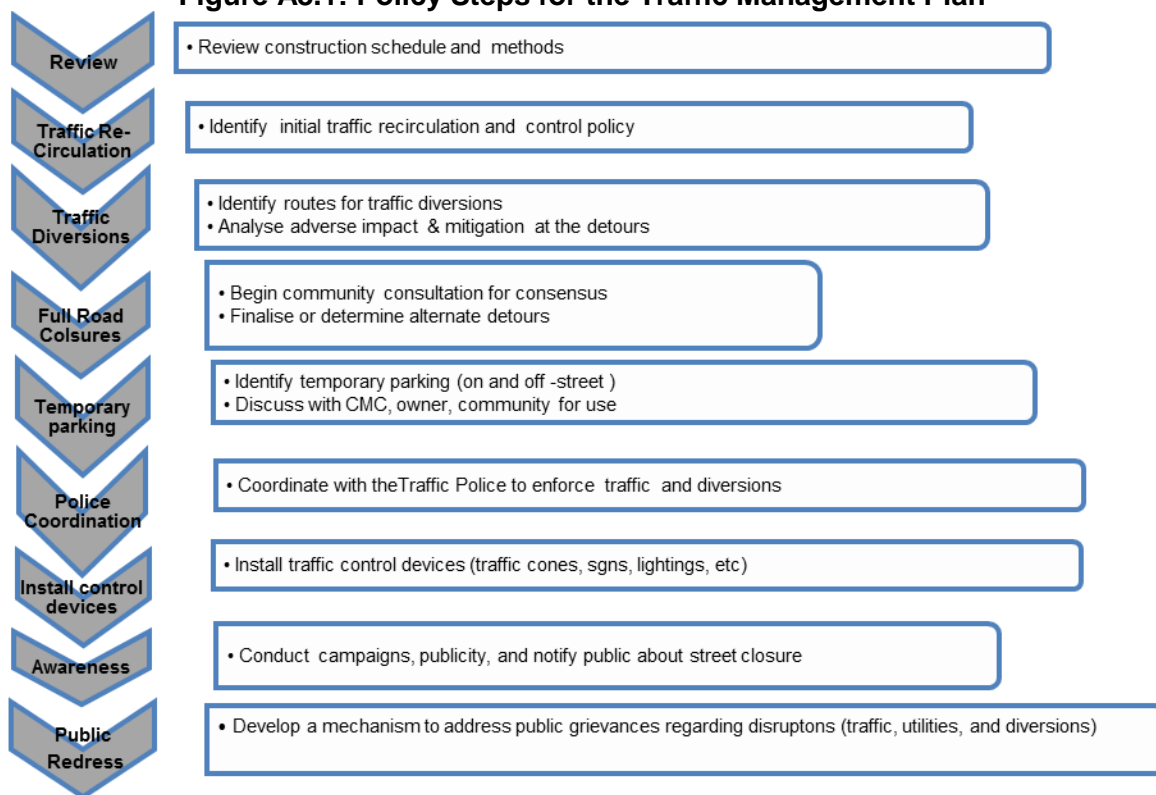
C. Analyze the Impact Due to Street Closure

3. Apart from the capacity analysis, a final decision to close a particular street and divert the traffic should involve the following steps:

- approval from the local authorities to use the local streets as detours;
- consultation with businesses, community members, traffic police, etc., regarding the mitigation measures necessary at the detours where the road is diverted during the construction;
- determining of the maximum number of days allowed for road closure, and incorporation of such provisions into the contract documents;
- determining if additional traffic control or temporary improvements are needed along the detour route;
- considering how access will be provided to the worksite;
- contacting emergency service, school officials, and transit authorities to determine if there are impacts to their operations; and
- developing a notification program to the public so that the closure is not a surprise. As part of this program, the public should be advised of alternate routes that commuters can take or will have to take as result of the traffic diversion.

4. If full road-closure of certain streets within the area is not feasible due to inadequate capacity of the Detour Street or public opposition, the full closure can be restricted to weekends.

Figure A8.1: Policy Steps for the Traffic Management Plan



D. Public awareness and notifications

5. As per discussions in the previous sections, there will be travel delays during the constructions, as is the case with most construction projects, albeit on a reduced scale if utilities and traffic management are properly coordinated. There are additional grounds for travel delays in the area, as most of the streets lack sufficient capacity to accommodate additional traffic from diverted traffic as a result of street closures to accommodate the works.

6. The awareness campaign and the prior notification for the public will be a continuous activity which the project will carry out to compensate for the above delays and minimize public claims as result of these problems. These activities will take place sufficiently in advance of the time when the roadblocks or traffic diversions take place at the particular streets. The reason for this is to allow sufficient time for the public and residents to understand the changes to their travel plans. The project will notify the public about the roadblocks and traffic diversion through public notices, ward level meetings and city level meeting with the elected representatives.

7. The PMCU and PIU will also conduct an awareness campaign to educate the public about the following issues:

- traffic control devices in place at the work zones (signs, traffic cones, barriers, etc.);
- defensive driving behavior along the work zones; and
- reduced speeds enforced at the work zones and traffic diversions.

8. It may be necessary to conduct the awareness programs/campaigns on road safety during construction.

9. The campaign will cater to all types of target groups i.e. children, adults, and drivers. Therefore, these campaigns will be conducted in schools and community centers. In addition, the project will publish a brochure for public information. These brochures will be widely circulated around the area and will also be available at the PMCU, PIU and the contractor's site offices. The text of the brochure should be concise to be effective, with a lot of graphics. It will serve the following purpose:

- Explain why the brochure was prepared, along with a brief description of the project;
- Advise the public to expect the unexpected;
- Educate the public about the various traffic control devices and safety measures adopted at the work zones;
- Educate the public about the safe road user behavior to emulate at the work zones;
- Tell the public how to stay informed or where to inquire about road safety issues at the work zones (name, telephone, mobile number of the contact person; and
- Indicate the office hours of relevant offices.

E. Vehicle Maintenance and Safety

10. A vehicle maintenance and safety program shall be implemented by the construction contractor. The contractor should ensure that all the vehicles are in proper running condition and it comply with roadworthy and meet certification standards of Government of Bangladesh. All vehicles to be used shall be in perfect condition meeting pollution standards of Government of Bangladesh. The vehicle operator requires a restate of shift checklist. Additional safety precautions will include the requirement for:

- Driver will follow the special code of conduct and road safety rules of Government of Bangladesh;
- Drivers to ensure that all loads are covered and secured drivers to ensure operation equipment can't leak materials hauled; and
- Vehicles will be cleaned and maintained in designed places.

F. Install traffic control devices at the work zones and traffic diversion routes

11. The purpose of installing traffic control devices at the work zones is to delineate these areas to warn, inform, and direct the road users about a hazard ahead, and to protect them as well as the workers. As proper delineation is a key to achieve the above objective, it is important to install good traffic signs at the work zones. The following traffic control devices are used in work zones:

- Signs
- Pavement Markings
- Channelizing Devices
- Arrow Panels
- Warning Lights

12. Procedures for installing traffic control devices at any work zone vary, depending on road configuration, location of the work, construction activity, duration, traffic speed and volume, and

pedestrian traffic. Work will take place along major roads, and the minor internal roads. As such, the traffic volume and road geometry vary. The main roads carry considerable traffic; internal roads in the new city areas are wide but in old city roads very narrow and carry considerable traffic. However, regardless of where the construction takes place, all the work zones should be cordoned off, and traffic shifted away at least with traffic cones, barricades, and temporary signs (temporary "STOP" and "GO").

13. The work zone should take into consideration the space required for a buffer zone between the workers and the traffic (lateral and longitudinal) and the transition space required for delineation, as applicable. For the works, a 30 cm clearance between the traffic and the temporary STOP and GO signs should be provided. In addition, at least 60 cm is necessary to install the temporary traffic signs and cones.

14. Traffic police should regulate traffic away from the work zone and enforce the traffic diversion result from full street closure in certain areas during construction. Flaggers/ personnel should be equipped with reflective jackets at all times and have traffic control batons (preferably the LED type) for regulating the traffic during night time.

15. In addition to the delineation devices, all the construction workers should wear fluorescent safety vests and helmets in order to be visible to the motorists at all times. There should be provision for lighting beacons and illumination for night constructions.

16. The PIU and contractor will coordinate with the local administration and traffic police regarding the traffic signs, detour, and any other matters related to traffic. The contractor will prepare the traffic management plan in detail and submit it along with the EMP for the final approval.

SAMPLE DAILY MONITORING SHEET FOR CONTRACTORS

CITY REGIONS DEVELOPMENT PROJECT II Contractor Monitoring Sheet

Name of Subproject: _____
 Location of Subproject: _____
 Chainage covered (for linear works): _____
 Supervising PIU: _____
 Contractor: _____
 Contractor EHS Supervisor (or equivalent): _____
 Date of monitoring: _____

Summary of Findings

Monitoring Item	Status	Remarks
1. Compliance with Local Permit Requirements	(Secured / Application Submitted / Not Applicable)	
<i>Location/zoning permits</i>		
<i>Permit to construct</i>		
<i>Building permit</i>		
<i>Transport / hauling permits</i>		
2. Compliance with IEE Requirements	(Approved / Under Preparation / Submitted to PIU for Approval)	
<i>Site-specific EMP (SEMP)</i>		
<i>Corrective Action Plan, if any</i>		
3. Compliance with SEMP		
Construction Site	(Satisfactory / Needs Improvement / Not Implemented)	
- Conduct of toolbox talk		
- Use of PPE		
- Rest areas for male and female workers		
- Toilets for male and female workers		
- Medical kits		
- Drinking water supply		
- Dust control		
- Noise control		
- Solid waste management		
- Wastewater management		
- Chemicals storage (fuel, oil, etc.)		
- Siltation or erosion control		
- Heavy equipment staging / parking area		
- Barricades around excavation sites		
- Access to residential houses/shops/businesses		
- Traffic routing signages		
- Lightings at night		
- Trench shoring / landslide protection		
Construction Workers' Camp Site	(Available / Needs Improvement / Not Available)	

Monitoring Item	Status	Remarks
- Quarters for male and female workers		
- Sleeping utilities (e.g. beds, pillows, blankets, mosquito nets, etc.)		
- Power/Electricity supply		
- Drinking water supply		
- Toilets for male and female workers		
- General purpose water supply (cooking, washing, bathing)		
- Cooking facilities and areas		
- Solid waste management		
- Wastewater management		
- Pest control		
4. Implementation of GRM	(Yes / No or None / Under Resolution)	
<i>Complaints</i>		
<i>Complaints resolution</i>		
5. Environmental Quality Measurement	(Passed / Failed / Not Applicable)	
<i>Ambient air quality sampling</i>		
<i>Noise level measurement</i>		
<i>Receiving water quality sampling</i>		

Other Issues: _____

Attachments:

1. Copies of permits secured, if any.
2. Photos taken at worksites, if any.
(photos attached in previous monitoring sheets should not be used again).
3. Laboratory results of environmental quality measurements, if any.

Prepared by: _____

Name, Designation and Signature

SAMPLE INSPECTION REPORT FOR PMCU AND PIUS

CITY REGIONS DEVELOPMENT PROJECT II SITE INSPECTION CHECKLIST

Subproject: _____

Date: _____

Location: _____

Chainage (for linear works): _____

Monitoring/Inspection Questions		Findings			Comments / Clarifications
1.	Supervision and Management Onsite	Yes	No	NA	
	a. Is an EHS supervisor available?				
	b. Is a copy of the SEMP available?				
	c. Are daily toolbox talks conducted on site?				
2.	The Facilities	Yes	No	NA	
	a. Are there a medical and first aid kits on site?				
	b. Are emergency contact details available on-site?				
	c. Are there PPEs available? What are they?				
	d. Are the PPEs in good condition?				
	e. Are there firefighting equipment on site?				
	f. Are there separate sanitary facilities for male and female workers?				
	g. Is drinking water supply available for workers?				
	h. Is there a rest area for workers?				
	i. Are storage areas for chemicals available and with protection? in safe locations?				
3.	Occupational Health and Safety	Yes	No	NA	
	a. Are the PPEs being used by workers?				
	b. Are excavation trenches provided with shores or protection from landslide?				
	c. Is breaktime for workers provided?				
	d. How many for each type of collection vehicle is in current use?				
4.	Community Safety	Yes	No	NA	
	a) Are excavation areas provided with barricades around them?				
	b) Are safety signages posted around the sites?				
	c) Are temporary and safe walkways for pedestrians available near work sites?				
	d) Is there a record of treated wastewater quality testing/measurement?				
5.	Solid Waste Management	Yes	No	NA	
	a. Are excavated materials placed sufficiently away from water courses?				
	b. Is solid waste segregation and management in place?				
	c. Is there a regular collection for solid wastes from work sites?				

Monitoring/Inspection Questions		Findings			Comments / Clarifications
6.	Wastewater Management	Yes	No	NA	
	a) Are there separate sanitary facilities for various types of use (septic tanks, urination, washing, etc.)?				
	b) Is any wastewater discharged to storm drains?				
	c) Is any wastewater being treated prior to discharge?				
	d) Are measures in place to avoid siltation of nearby drainage or receiving bodies of water?				
	e) Are silt traps or sedimentation ponds installed for surface runoff regularly cleaned and freed of silts or sediments?				
7.	Dust Control	Yes	No	NA	
	a. Is the construction site watered to minimize generation of dust?				
	b. Are roads within and around the construction sites sprayed with water on regular intervals?				
	c. Is there a speed control for vehicles at construction sites?				
	d. Are stockpiles of sand, cement and other construction materials covered to avoid being airborne?				
	e. Are construction vehicles carrying soils and other spoils covered?				
	f. Are generators provided with air pollution control devices?				
	g. Are all vehicles regularly maintained to minimize emission of black smoke? Do they have valid permits?				
8.	Noise Control	Yes	No	NA	
	a) Is the work only taking place between 7 am and 7 pm, week days?				
	b) Do generators operate with doors closed or provided with sound barrier around them?				
	c) Is idle equipment turned off or throttled down?				
	d) Are there noise mitigation measures adopted at construction sites?				
	e) Are neighboring residents notified in advance of any noisy activities expected at construction sites?				
9.	Traffic Management	Yes	No	NA	
	a) Are traffic signages available around the construction sites and nearby roads?				
	b) Are re-routing signages sufficient to guide motorists?				
	c) Are the excavation sites along roads provided with barricades with reflectors?				
	d) Are the excavation sites provided with sufficient lighting at night?				

Monitoring/Inspection Questions		Findings			Comments / Clarifications
10.	Recording System	Yes	No	NA	
	a) Do the contractors have recording system for SEMP implementation?				
	b) Are the daily monitoring sheets accomplished by the contractor EHS supervisor (or equivalent) properly compiled?				
	c) Are laboratory results of environmental sampling conducted since the commencement of construction activities properly compiled?				
	d) Are these records readily available at the site and to the inspection team?				

Other Issues: _____

Prepared by: _____
 Name, Designation and Signature

SEMI-ANNUAL ENVIRONMENTAL MONITORING TEMPLATE

INTRODUCTION

- Overall project description and objectives
- Environmental category as per ADB Safeguard Policy Statement, 2009
- Environmental category of each subproject as per national laws and regulations
- Project Safeguards Team

Name	Designation/Office	Email Address	Contact Number	Roles
1. PMU				
2. PIUs				
3. Consultants				

- Overall project and subproject progress and status
- Description of subprojects (package-wise) and status of implementation (preliminary, detailed design, on-going construction, completed, and/or O&M stage)

Package Number	Components/List of Works	Contract Status (specify if under bidding or contract awarded)	Status of Implementation (Preliminary Design/Detailed Design/On-going Construction/Completed/O&M) ^a	If On-going Construction	
				%Physical Progress	Expected Completion Date

^a If on-going construction, include %physical progress and expected date of completion.

COMPLIANCE STATUS WITH NATIONAL/STATE/LOCAL STATUTORY ENVIRONMENTAL REQUIREMENTS^a

Package No.	Subproject Name	Statutory Environmental Requirements ^b	Status of Compliance ^c	Validity if obtained	Action Required	Specific Conditions that will require environmental monitoring as per Environment Clearance, Consent/Permit to Establish ^d

^a All statutory clearance/s, no-objection certificates, permit/s, etc. should be obtained prior to award of contract/s. Attach as appendix all clearance obtained during the reporting period. If already reported, specify in the "remarks" column.

^b Specify (environmental clearance? Permit/consent to establish? Forest clearance? Etc.)

^c Specify if obtained, submitted and awaiting approval, application not yet submitted

^d *Example: Environmental Clearance requires ambient air quality monitoring, Forest Clearance/Tree-cutting Permit requires 2 trees for every tree, etc.*

COMPLIANCE STATUS WITH ENVIRONMENTAL LOAN COVENANTS

No. (List schedule and paragraph number of Loan Agreement)	Covenant	Status of Compliance	Action Required

COMPLIANCE STATUS WITH THE ENVIRONMENTAL MANAGEMENT PLAN (REFER TO EMP TABLES IN APPROVED IEE/S)

- Confirm if IEE/s require contractors to submit site-specific EMP/construction EMPs. If not, describe the methodology of monitoring each package under implementation.

Package-wise IEE Documentation Status

Package Number	Final IEE based on Detailed Design				Site-specific EMP (or Construction EMP) approved by Project Director? (Yes/No)	Remarks
	Not yet due (detailed design not yet completed)	Submitted to ADB (Provide Date of Submission)	Disclosed on project website (Provide Link)	Final IEE provided to Contractor/s (Yes/No)		

- For each package, provide name/s and contact details of contractor/s' nodal person/s for environmental safeguards.

APPROACH AND METHODOLOGY FOR ENVIRONMENTAL MONITORING OF THE PROJECT

- Briefly describe the approach and methodology used for environmental monitoring of each sub-project.

MONITORING OF ENVIRONMENTAL IMPACTS ON PROJECT SURROUNDINGS (AMBIENT AIR, WATER QUALITY AND NOISE LEVELS)

- Discuss the general condition of surroundings at the project site, with consideration of the following, whichever are applicable:
 - Confirm if any dust was noted to escape the site boundaries and identify dust suppression techniques followed for site/s;
 - Identify if muddy water is escaping site boundaries or if muddy tracks are seen on adjacent roads;
 - Identify type of erosion and sediment control measures installed on site/s, condition of erosion and sediment control measures including if these are intact following heavy rain;
 - Identify designated areas for concrete works, chemical storage, construction materials, and refueling. Attach photographs of each area in the Appendix;
 - Confirm spill kits on site and site procedure for handling emergencies;
 - Identify any chemical stored on site and provide information on storage condition. Attach photograph;
 - Describe management of stockpiles (construction materials, excavated soils, spoils, etc.). Provide photographs;
 - Describe management of solid and liquid wastes on-site (quantity generated, transport, storage and disposal). Provide photographs;
 - Provide information on barricades, signages, and on-site boards. Provide photographs in the Appendix; and
 - Indicate if there are any activities being under taken out of working hours and how that is being managed.
- Briefly discuss the basis for environmental parameters monitoring.
- Indicate type of environmental parameters to be monitored and identify the location.
- Indicate the method of monitoring and equipment used.
- Provide monitoring results and an analysis of results in relation to baseline data and statutory requirements.

As a minimum the results should be presented as per the tables below.

Air Quality Results

Site No.	Date of Testing	Site Location	Parameters (Government Standards)		
			PM10 µg/m3	SO2 µg/m3	NO2 µg/m3

Site No.	Date of Testing	Site Location	Parameters (Monitoring Results)		
			PM10 µg/m3	SO2 µg/m3	NO2 µg/m3

Water Quality Results

Site No.	Date of Sampling	Site Location	Parameters (Government Standards)					
			pH	Conductivity µS/cm	BOD mg/L	TSS mg/L	TN mg/L	TP mg/L

Site No.	Date of Sampling	Site Location	Parameters (Monitoring Results)					
			pH	Conductivity µS/cm	BOD mg/L	TSS mg/L	TN mg/L	TP mg/L

Noise Quality Results

Site No.	Date of Testing	Site Location	LA _{eq} (dBA) (Government Standard)	
			Day Time	Night Time

Site No.	Date of Testing	Site Location	LA _{eq} (dBA) (Monitoring Results)	
			Day Time	Night Time

GRIEVANCE REDRESS MECHANISM

- Provide information on establishment of grievance redress mechanism and capacity of grievance redress committee to address project-related issues/complaints. Include as appendix Notification of the GRM (town-wise if applicable).

COMPLAINTS RECEIVED DURING THE REPORTING PERIOD

- Provide information on number, nature, and resolution of complaints received during reporting period. Attach records as per GRM in the approved IEE. Identify safeguards team member/s involved in the GRM process. Attach minutes of meetings (ensure English translation is provided).

SUMMARY OF KEY ISSUES AND REMEDIAL ACTIONS

- Summary of follow up time-bound actions to be taken within a set timeframe.

APPENDIXES

- Photos
- Summary of consultations
- Copies of environmental clearances and permits

- Sample of environmental site inspection report
- all supporting documents including **signed** monthly environmental site inspection reports prepared by consultants and/or contractors
- Others