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GUIDE TO ENCOUNTERING AND WORKING WITH CULTURAL HERITAGE

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ACRONYMS

ADS	Automated Directives System
CFP	Chance Find Procedure
CHMP	Cultural Heritage Management Plan
CLA	Collaboration, Learning, and Adapting
ECOS	Environmental Compliance Support
EIA	Environmental Impact Assessment
EMMP	Environmental Monitoring and Mitigation Plan
EMMR	Environmental Monitoring and Mitigation Report
ESIA	Environmental and Social Impact Assessment
FPIC	Free, Prior, and Informed Consent
ICCROM	International Centre for the Study of the Preservation and Restoration of Cultural Property
ICOMOS	International Council on Monuments and Sites
IEE	Initial Environmental Examination
IUCN	International Union for Conservation of Nature
LGBT	Lesbian, Gay, Bisexual, and Transgender
LGBTQI+	Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersex Plus
MEL	Monitoring, Evaluation, and Learning
UNESCO	United Nations Educational, Scientific, and Cultural Organization
USAID	United States Agency for International Development

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I. INTRODUCTION

The United States Agency for International Development (USAID) works in over 80 countries to promote global health, support global stability, provide humanitarian assistance, catalyze innovation and partnership, and empower women and girls. These actions may introduce practices and projects that directly or indirectly affect the cultural heritage of a community or region. Cultural heritage is important to consider during the environmental review process under 22 CFR 216 (Environmental Compliance Procedures). This Guide is for USAID staff and Implementing Partners involved in planning, designing, implementing, evaluating, and monitoring actions led by USAID (such as Mission Environmental Officers, Bureau Environmental Officers, Agreement Officers' Representatives, and Contracting Officers' Representatives). The goal of this Guide is to expand understanding of cultural heritage and to provide practical suggestions for incorporating considerations of cultural heritage throughout the project life cycle, with an understanding that cultures differ regionally and thus practices will need be tailored to a given area.

Consultation and stakeholder engagement are key to identifying cultural heritage, understanding how an action will affect it, and implementing good practices when working in an area. Stakeholders may be community members or leaders, cultural heritage professionals, or anyone who engages with cultural heritage. They can provide information that can be invaluable to understanding and avoiding potentially negative impacts during USAID actions. Stakeholders can supplement or expand on information discerned from academic literature, technical documents, site visits, key informant interviews, and other methods of research used during environmental reviews. Including cultural heritage considerations as part of the environmental review process can help USAID build better relationships with communities and efficiently and effectively consider and address potential impacts.

2. USAID AND CULTURAL HERITAGE

USAID actions may affect cultural heritage in many ways. Understanding the scope of what cultural heritage is and what types of cultural heritage resources exist is crucial to determining how different actions may affect these resources. This section provides a definition of cultural heritage and provides guidance on the types of impacts that USAID staff and Implementing Partners may consider.

2.1. WHAT IS "CULTURAL HERITAGE?"

The United Nations Educational, Scientific, and Cultural Organization (UNESCO) describes cultural heritage as the societal legacy which we receive from the past, which we live in the present, and which we will pass on to future generations. UNESCO oversees the World Heritage List and has created operational guidelines under the World Heritage Convention. As defined in the Convention, cultural heritage includes monuments (e.g., architecture works, sculptures, elements, or structures of an archaeological nature); groups of buildings; and sites (e.g., archaeological sites, burial sites, and areas of human-made and natural features) that are of outstanding universal value from a historical, artistic, scientific, aesthetic, ethnological, or anthropological point of view (UNESCO 1972, 16). Today we construe cultural heritage broadly, and it includes tangible or intangible cultural assets (see text box). Examples of tangible cultural heritage include moveable objects

COMPONENTS OF CULTURAL HERITAGE

Cultural heritage includes archaeological sites, historic buildings, artifacts, and natural environments as well as intangible knowledge and practices inherited from past generations that inform and influence how we live in the present and which will be passed on to future generations.

(including artifacts, paintings, coins, manuscripts, and sculpture), underwater resources or sites (including shipwrecks, ruins, and submerged landscapes), and paleontological remains.

In contrast to tangible resources, intangible resources are aspects of culture, history, and tradition that may be invisible. Intangible heritage may be apparent only to people of the associated culture. Intangible heritage can include oral traditions and expressions, folklore, beliefs, language, knowledge, performing arts, social practices, rituals, festive events, and traditional craftsmanship (UNESCO 2003, 32; International Council on Monuments and Sites [ICOMOS] 2018, 2). When determining how cultural heritage may be affected by USAID actions, the effect of the action must be considered for both tangible and intangible aspects. Intangible heritage may be associated with tangible heritage, such as practices or customs that are unique to a group, community, or family that occur at a specific location with cultural value, such as sacred or burial sites. Often, the best or even the only way to understand impacts on intangible heritage is to work with local communities, cultural heritage stakeholders, and other groups who are participating in or carrying on traditions or activities.

Cultural heritage may include natural resources, which may be combined with human-made sites or buildings to create a cultural landscape. As described by the U.S. National Park Service, cultural landscapes are geographic areas that include “both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values” (Birnbaum 1994, 1). Cultural landscapes “have been affected, influenced, or shaped by human involvement (Cultural Landscape Foundation 2023). Such landscapes are not always formally documented, and aspects of them may not be shared with visitors. To understand if the action area is a cultural landscape, stakeholder engagement is needed. Local communities can help USAID teams better understand how their history and culture are intertwined with the natural environment. All the tangible and intangible elements they may disclose (and those they may not) taken together create this landscape.

Awareness among USAID staff and Implementing Partners of the various types of cultural heritage is beneficial to ensure comprehensive identification of impacts and associated resolutions, including avoidance, minimization, or mitigation planning. Timely consideration of impacts is essential for all cultural heritage resources encountered.

This discussion of what constitutes cultural heritage is broad and not exhaustive. Every group, community, or settlement has its own traditions and ideas of what defines their cultural heritage and what sites, places, practices, or spaces are of significant cultural value. Therefore, it is imperative to consult and collaborate with local communities to understand what they consider to be culturally significant and worthy of attention and protection. This emphasis on communication and collaboration reflects core components for identifying impacts on cultural heritage:

- Recognizing cultural heritage and its cultural value to local communities;
- Understanding respectful engagement and equitable benefits;
- Recognizing the role cultural heritage plays in self-reliance and development; and
- Recognizing how heritage contributes to post-disaster and post-conflict recovery.

The USAID Program Cycle is a dynamic and adaptive process that emphasizes collaboration, stakeholder and community engagement, and locally led development. These principles are also key in cultural heritage recognition, protection, and management. Therefore, cultural heritage considerations can readily be incorporated into the Program Cycle to address impacts on cultural sites, places, landscapes, or traditions that may result from an action. Understanding the types of potential impacts that may result from USAID development programs is the first key step in addressing cultural heritage considerations.

WHY IS PROTECTING CULTURAL HERITAGE IMPORTANT?

Cultural variation plays a paramount role in humans' evolutionary change because diversity in cultural expressions is a key component to the cumulative aspect of cultural evolution (Henrich 2015). Thus, maintaining cultural diversity is of critical importance to the survival of our species (Lipo and Madsen 1993). Traditional (or indigenous) knowledge has proven to be quite useful in understanding the impacts of climate change on various subsistence systems, as well as providing observational evidence and adaptation strategies (Norton-Smith et al. 2016). Indigenous groups use social and cultural systems in maintaining a vast array of information, including subsistence techniques and traditional ecological knowledge (Thom and Bain 2004; Nakashima, et al. 2012). A UNESCO report by the Intergovernmental Panel on Climate Change has provided evidence showing how effective indigenous knowledge has been in informing our climate change adaptation strategies in various fields, including agroforestry, traditional medicine, biodiversity conservation, resource management, applied anthropology, impact assessment, and natural disaster preparedness and response (Nakashima, et al. 2012).

In addition, others have argued that local and indigenous knowledge could complement scientific ecological efforts to combat climate change (Berkes 2017). Therefore, the USAID program officers' efforts to protect cultural heritage could possibly lead to the corollary but vital adaptation strategies that humans might deploy in the future to combat climate change.

2.2. POTENTIAL IMPACTS ON CULTURAL HERITAGE FROM DEVELOPMENT PROGRAMS

USAID's Automated Directives System (ADS) Chapter 204: Environmental Procedures describes in detail the environmental impact assessment (EIA) process for all USAID Missions, projects, and activities, and substantive amendments under 22 CFR 216 ("Reg. 216") (USAID 1976). Cultural heritage can be considered throughout the EIA process. As a part of any environmental assessment work, Missions also need to consider host country laws relating to cultural heritage where appropriate and applicable; the [UNESCO database](#) can help teams identify these laws (UNESCO 2021).

USAID actions vary in location, scale, and complexity; therefore, impacts on cultural heritage also vary. Projects or activities that may affect cultural heritage include excavation, construction, demolition, flooding, vibration, and other physical changes to the environment, often related to transportation, energy, sanitation, industrial, housing, and tourism projects. Visual, audible, atmospheric, hydrologic, or other changes can result in direct and indirect impacts, such as loss of access to cultural heritage, increased dust or pollution during construction, or even physical changes that affect the intangible qualities of an area, which may include views, vistas, or spiritual aspects as recognized by communities. These impacts might also include modernization that changes traditional practices, including craftsmanship, folkways, or ways of living in a community that constitute intangible cultural heritage. These activities may negatively affect the cultural heritage of the site or affect the ability of a community

to convey culture, history, or traditions. Some of these impacts can only be recognized or assessed with help from local communities through stakeholder engagement, consequently, this process should begin as early as possible.

Indirect impacts may result from projects or activities that do not directly or physically affect cultural heritage. For example, actions that affect air quality (such as the release of fumes or gases) or involve livestock grazing or forest/watershed management may indirectly affect access to or the physical condition of cultural heritage. Air pollution can corrode or disintegrate certain materials like limestone and bronze that make up historic structures, causing considerable damage over time. The introduction of livestock can change or damage natural environments associated with cultural landscapes.

Management of natural areas, including forests and watersheds, can affect archaeological sites, cultural landscapes, and other types of cultural heritage. For example, the establishment of a new park may limit access to sacred places or hinder or prevent cultural practices due to landscape or accessibility changes. The construction of a new dam could flood historic or cultural sites or alter the flow of a waterbody. These alterations may disrupt traditional or current uses of that waterbody and the habitats of animal or plant species that may be integral to specific cultural practices or customs or cultural landscapes. These impacts may not be immediately recognizable. Stakeholder engagement with local community members can provide a better understanding of the significance of certain places and spaces to community members and can help identify ways to avoid negative impacts and promote positive ones.

Cumulative changes are the result of incremental changes over time in the larger context of a site or landscape. For example, if an action requires additional social or transportation infrastructure to function or if there are multiple actions planned in one area, cumulative impacts resulting from incremental changes may need to be considered. Stakeholder engagement can be used to discuss incremental changes and determine levels and severity of impacts, as well as opportunities for positive community change.

Positive impacts on cultural heritage may also result from USAID actions. For instance, an action may provide data to local organizations about history or culture as revealed through archival research, documentation, or investigations of buildings, landscapes, or sites if any are discovered or documented during the operational phase of the action or through mitigation efforts. Actions may contribute to sustainable heritage tourism by providing new or better access through infrastructure improvements or recovery activities to restore built resources. Infrastructure improvements can increase employment opportunities for local communities, such as through tourism, and may also increase awareness of the importance of protecting cultural heritage. An action may also create jobs through rehabilitation, protection, or preservation of cultural heritage. Tourism can also potentially have negative impacts on cultural heritage, depending on the context, consequently it is important to consider ways to support sustainable tourism throughout the project (USAID 2009; UNESCO 2022).

DEFINITIONS

Action: What is being done, i.e., building a road.

Activity: An implementing mechanism that carries out an intervention or set of interventions to advance identified development result(s). Activities include contracts or cooperative agreements with international or local organizations, direct agreements with partner governments, and partial credit guarantees that mobilize private capital. Activities also include buy-ins under global agreements (e.g., Field-Support agreements) that generate programmatic results in a given country or region (USAID 2021b, 9).

Project: A group of activities designed and managed in a coordinated way to advance results set forth in a Country Development Cooperation Strategy (or other strategic framework) and foster lasting gains to promote locally led development in a country or region (USAID, 2021b, 228).

USAID actions may also benefit intangible cultural heritage by supporting or improving a community’s connection to its land, which may help sustain traditional practices or cultural customs. For communities with strong connections between the cultural and natural environments, actions that work toward combating climate change, for example, may contribute to the protection of natural resources and landscapes integral to a community’s cultural identity.

3. GOOD PRACTICES FOR INTEGRATING CULTURAL HERITAGE INTO THE USAID PROGRAM CYCLE

Considering cultural heritage consistently throughout the Program Cycle and within the environmental review process is a good way to ensure that risks and negative impacts are being minimized or avoided while working toward potential positive impacts and supporting community cultural heritage preservation and locally led development. Preserving cultural heritage ensures that history and cultural diversity are protected for future generations. Consideration of cultural heritage can promote more just outcomes, work in tandem with environmental sustainability efforts, and help communities understand their past. If USAID actions take into consideration the cultural characteristics of an area, not only can cultural heritage be protected and preserved, but it may be possible to provide a net positive outcome for the local cultural landscape.

3.1. STAKEHOLDER ENGAGEMENT WITH LOCAL COMMUNITIES

Stakeholder engagement and consultation with local community members and groups is imperative to understanding potential impacts on cultural heritage. Questions and considerations can be addressed during other consultations so as not to overburden the community with multiple stakeholder meetings and so that the environmental review process can be completed efficiently. Educational institutions and academic communities may also be valuable resources regarding cultural heritage and local preservation practices. USAID has information and guidelines on stakeholder engagement (see Table I), which will be helpful when organizing community meetings and investigating cultural heritage considerations (USAID 2016a).

Table I includes several USAID resources that are relevant for stakeholder engagement with local communities regarding cultural heritage.

TABLE I. USAID POLICIES AND GUIDANCE TO SUPPORT CONSIDERATIONS OF CULTURAL HERITAGE

USAID POLICY OR GUIDANCE DOCUMENT	CONSIDERATIONS FOR CULTURAL HERITAGE
22 CFR 216 Agency Environmental Procedures	Environmental assessments should consider impacts on historic and cultural resources and potential mitigation measures (216.6(c)(5)). “Reg 216” guides the identification and discussion of impacts and notes that, within the environmental policy framework, USAID should identify impacts on common and cultural heritage of all mankind (216.1(b)(3)).
Environmental Compliance Factsheet: Stakeholder Engagement in the Environmental and Social Impact Assessment (ESIA) Process	Evaluating the risks associated with cultural heritage for a particular action should be considered as part of the ESIA process. This factsheet provides guidance and best practices on how to undertake stakeholder engagement.

USAID POLICY OR GUIDANCE DOCUMENT	CONSIDERATIONS FOR CULTURAL HERITAGE
Protected Area Social Safeguards: Community Engagement	There may be cultural heritage resources present inside a protected area which may need to be identified and assessed through stakeholder engagement. This Community Engagement Guide delves into key concepts and provides guidance on approaches, frameworks, and tools for engaging communities in a protected area.
Program Cycle Operational Policy: ADS Chapter 201 U.S. Agency for International Development	Cultural heritage may be considered within the program cycle, and the section on stakeholder engagement in this document provides general guidance and best practices for engagement, which may be applied to identifying, assessing, and mitigating cultural heritage impacts.
Promoting Nondiscrimination and Inclusive Development in USAID-Funded Programs: A Mandatory Reference for ADS Chapter 200	Nondiscrimination practices are essential to empowering people or groups who are in potentially vulnerable and marginalized, and/or underrepresented such as (but not limited to): women and girls, marginalized ethnic and religious populations, Indigenous Peoples, internally displaced persons, persons with disabilities, youth, and elderly, LGBTQI+ individuals, and other socially marginalized peoples. Promoting nondiscrimination and inclusive development is key to identifying and assessing cultural heritage. This document reiterates the importance of upholding principles of inclusion and equitable access.
Policy on Promoting the Rights of Indigenous Peoples¹ USAID Gender Equality and Female Empowerment Policy Youth in Development Policy USAID Disability Policy Paper User's Guide to Democracy, Human Rights, and Governance LGBT Vision for Action -- Promoting and Supporting the Inclusion of Lesbian, Gay, Bisexual and Transgender Individuals	Considering the diverse perspectives of people or groups who are in potentially vulnerable, marginalized, and/or underrepresented conditions is important to identifying, assessing, and proposing mitigation measures for cultural heritage impacts. This suite of documents provides guidance and best practices on promoting the rights of Indigenous Peoples, gender equality and female empowerment, youth and persons with disabilities in development, human rights and governance, and supporting the inclusion of LGBTQI+ individuals, in order to ensure a socially inclusive approach to stakeholder engagement.

3.2. CONFIDENTIALITY

As trust is established with cultural heritage stakeholders, they may reveal confidential information about sites or activities that they consider culturally significant. This information may describe the background and provide the locations of archaeological sites or sacred lands, grave sites or cemeteries, and other sacred places or traditions. Keeping this information confidential helps to prevent looting, vandalism, unwanted tourism, or damage to historic or cultural sites. Excluding confidential information from environmental documents, unless prior consent of the associated group has been obtained, will help safeguard cultural heritage. Consider consulting with other stakeholders and verifying national or

¹ Stakeholder engagement with Indigenous Peoples must include Free, Prior, and Informed Consent (FPIC).

local laws regarding this type of information protection. Information gathered during mitigation efforts can be provided to local communities for their archives and to help preserve knowledge.

3.3. SCALING CONSIDERATIONS TO THE LEVEL OF RISK OR IMPACT

It is good practice to consider impacts on cultural heritage at the beginning of the strategic planning and design stages of any action. The process of considering, avoiding, minimizing, and mitigating impacts should be commensurate with the level of risk. If it is unlikely that an action will affect cultural heritage, then efforts to avoid, minimize, or mitigate impacts to cultural heritage may be less intensive. In the early stages of the project and activity design process staff can plan to avoid cultural heritage and impacts, then planning for mitigation would likely be unnecessary.

If avoidance, minimization, or mitigation is being considered, it should be incorporated into the early design process. For instance, an action with new physical impacts on a community, such as conversions of land to new agricultural uses or the construction of a new school, may affect cultural heritage and would require collaboration with community members to minimize or mitigate impacts to cultural heritage. Alternatively, an action that is focused on improving existing wells may have few or no impacts on cultural heritage if these wells are already in existence. Some actions, such as those associated with expanding or altering water access, may affect both tangible and intangible cultural heritage or even cultural landscapes; therefore, potential impacts should be considered for each action.

Cultural heritage impact considerations should be based on an action's complexity and geographic location. Background research and consultation with stakeholders on cultural heritage during the initial planning stages and Initial Environmental Examination (IEE) can provide a baseline for assessment of possible impacts and risks. If a cultural heritage risk is identified early, it is possible to reduce the overall risk level through avoidance or minimization. Efforts should be scaled to impacts in a way that is appropriate and manageable within the project cycle.

GUIDING QUESTIONS: ASSESSING RISKS TO CULTURAL HERITAGE

What types of cultural heritage resources (tangible or intangible) are associated with the action area?

Does the action pose potential negative impacts on cultural heritage? If yes, does this constitute a risk, such as a programmatic risk, reputational risk, legal risk, or other?

How will local communities be engaged through meaningful stakeholder engagement? This engagement is especially important if the action area is not well-documented in terms of cultural heritage sites or landscapes. Stakeholder engagement may reveal potential impacts on intangible cultural heritage to consider during the planning and design phases.

3.4. IDENTIFYING CULTURAL HERITAGE RESOURCES

Knowledge of known or recorded cultural heritage in and around the area of the proposed action is an important first step for an assessment of impacts. This step can be achieved by researching the site and surrounding area and engaging with stakeholders, community members, and Implementing Partners. If an action is large-scale or complex, a preparatory research effort can help assess the risks at the outset and possibly avoid impacts before final design and implementation. Readily available sources of information include the following:

- [World Heritage List](#)
- [World Heritage Tentative List](#)

- [List of World Heritage in Danger](#)
- [World Monuments Fund: World Monuments Watch](#)
- [UNESCO Database of National Cultural Heritage Laws](#)
- [ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties](#)
- Country/regional/local lists of cultural heritage resources found on government and cultural organization websites that address the project or intervention area.

These world and national cultural heritage lists are not exhaustive; they represent only well-documented or well-known forms of cultural heritage. Other examples exist that may be smaller or locally significant.

If a proposed action is near a designated World Heritage Site, USAID staff should collaborate with stakeholders and communities to avoid contributing to cumulative impacts on these internationally significant sites. If an impact to a World Heritage Site is possible, reach out to USAID or State Department staff who have worked on actions in the same or nearby areas, or on similar actions, and may have previously identified and worked with relevant cultural heritage stakeholders.

Some communities may not have the resources to complete inventories of cultural or natural heritage sites. Additionally, some communities are not willing to share information about sites of significant cultural value with outside researchers, USAID staff, or Implementing Partners. They have the right not to disclose this information. Therefore, it's important to engage with local stakeholders in culturally sensitive ways, to understand what cultural resources communities value and how they would like to protect them. Open communication and trust building within communities will increase the likelihood that cultural heritage will be protected.

GUIDING QUESTIONS: UNDERSTANDING CULTURAL HERITAGE CONTEXT

What are the national, subnational, and local laws and regulations (or even practices) relating to cultural heritage?

What is the organizational structure and capacity of this area or nation for cultural heritage protection or preservation?

What are the current conditions of cultural heritage resources?

3.5. COMMUNITY MEETINGS AND INFORMATION GATHERING

When planning an overall stakeholder engagement strategy and meetings, include cultural heritage topics within the meeting agenda to use time efficiently and avoid consultation fatigue among the team and community members. Some helpful tips for planning a stakeholder engagement strategy or community meeting include the following:

- Invite groups who will be most affected by the action to meetings early in the planning and design phase to engage them in a meaningful manner so that they may share their local and traditional knowledge. Open dialogues can provide a unique opportunity to devise creative solutions to potential impacts.
- Identify a variety of stakeholder groups who may be able to inform the planning and design team about cultural heritage—both tangible and intangible—in the action area, including the following:
 - National/regional/local cultural and historical societies, as appropriate;
 - Educational institutes with scholars that specialize in cultural heritage;

- Groups associated with traditional practices;
 - Indigenous Peoples and other vulnerable groups (e.g., elderly, women, LGBT);
 - Spiritual leaders;
 - Government representatives; and
 - Other national/subnational/local cultural heritage experts or representatives, as appropriate.
- Consider the risk level posed to cultural heritage resources for assessing the level of engagement.
 - Make community meetings and project information accessible to all groups and consider local/national laws pertaining to accessibility.
 - Utilize informant interviews or focused meetings, as appropriate, with specific groups (such as women and girls) and provide assurances of confidentiality. Research and engagement may reveal that certain groups (e.g., Indigenous Peoples, government representatives) may not be comfortable sharing information in the context of group meetings.

There may be times when inviting cultural heritage stakeholders to the proposed action area may facilitate a community’s understanding of the potential impacts. The meeting may involve inviting leaders from multiple communities, groups, or government agencies to the potential site to discuss the features of the area that are representative of their cultural heritage. Groups may be invited to meet together or separately, depending on competing and conflicting interests among various groups. Some sites have a long history and represent different ideas, events, or cultural ties to different groups, which may cause tension. Listening to all perspectives is important and may be done outside of a community meeting setting to ensure that everyone feels heard and included. Expressed concerns may be synthesized into cultural heritage goals that work with the Mission’s objectives and that will be acceptable to or beneficial, if possible, for all parties. Training and conflict assessments are available through the USAID Center for Conflict and Violence Prevention.

3.6. CHANCE FIND PROCEDURES

Chance Finds are tangible cultural heritage resources encountered unexpectedly during project construction or operation. Chance Find Procedures (CFPs) are project-specific procedures that outline actions to be taken if previously unknown cultural resources (chance finds) are encountered during project implementation, including provisions for managing chance finds and avoiding disturbance of resources within a project area (International Finance Corporation 2012). When working in an area that is rich in cultural heritage, particularly archaeological resources, crafting CFPs may be necessary prior to beginning an action. A CFP should not be substituted for initial identification of cultural heritage efforts. Plans for site identification and monitoring for cultural heritage resources should be developed before commencing ground-disturbing activities in any areas with a high likelihood of such resources. These plans may include various noninvasive techniques such as surveys and remote sensing. When such investigations are not possible or do not fully assess the presence of archaeological resources, a CFP may be used to resolve potential unknown impacts. Cultural heritage can be added to overall action monitoring and should outline what will happen on-site in the event of a discovery of cultural heritage.

Chance Find Procedures should integrate the country-specific regulations regarding chance finds, including human remains. A CFP may include the following stipulations, which should be developed and agreed upon through stakeholder engagement during early meetings:

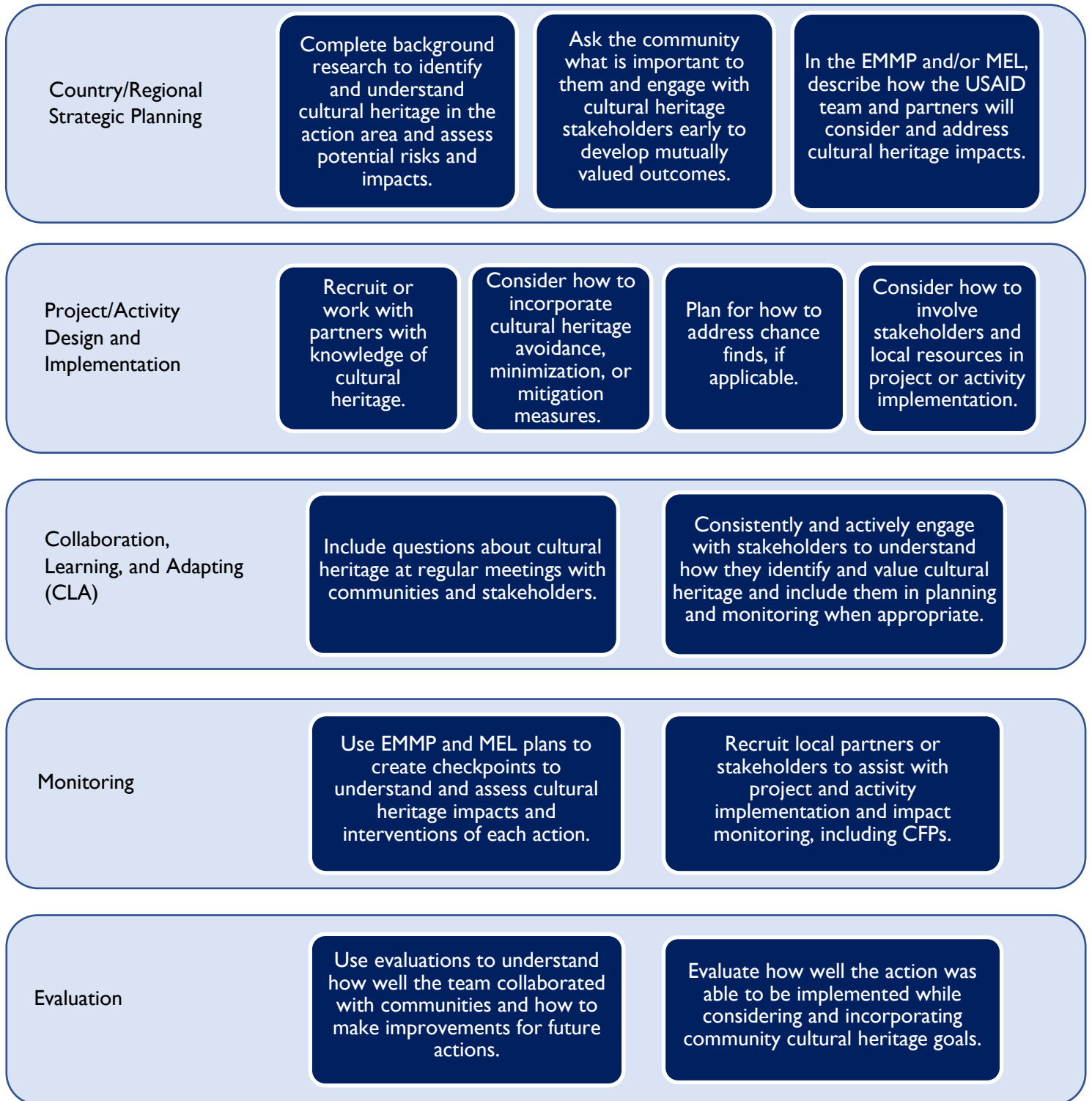
- If a partner or contractor believes that activities have uncovered or disturbed cultural heritage, work should stop immediately.
- The discovery site should not be left unsecured.
- A designated monitor, archaeologist, or partner should be contacted.
- An appropriate facility to store any finds should be identified prior to beginning any work.
- Other designated partners should be notified of the discovery. These partners may include representatives of the local communities or other local, regional, or national cultural heritage professionals who have been designated as advisors for the project team on local laws, regulations, or conventions regarding such discoveries.
- It is also good practice to keep a small group of local representatives informed of any discoveries to promote engagement and locally led development in planning how to respond to these finds. This small group approach will also help the team to determine whether any information (such as site location) should be kept confidential.
- Designated partners, who may be trained cultural heritage professionals, should document the site and discovery.
- Consultation for avoidance, minimization, or mitigation should be conducted with partners and stakeholders.

4. PROGRAM CYCLE AND INTEGRATION OF CULTURAL HERITAGE CONSIDERATIONS

The practices for cultural heritage considerations described above can be integrated into the specific steps of the Program Cycle. As described in ADS 201 (Program Cycle Operational Policy), the Program Cycle includes four key steps and a feedback mechanism resulting from Collaboration, Learning, and Adapting (CLA). Figure 1 provides a summary of this integration of cultural heritage considerations throughout the Program Cycle.

The remainder of this section includes tips and strategies for incorporating cultural heritage considerations into the steps of the Program Cycle. Within the Program Cycle, measures to avoid, minimize, or mitigate potentially negative impacts on cultural heritage resources can be developed during Project and Activity Design and Implementation and through CLA. Suggestions for such measures and how to develop them are included in this section.

Figure I. Considering Cultural Heritage Throughout the Program Cycle



4.1. COUNTRY/REGIONAL STRATEGIC PLANNING

While the team is developing the initial consultation and setting parameters during Country/Regional Strategic Planning, it should consider cultural heritage. Research about the history and culture of the action area, as described above, can inform the planning process. During the action planning and design phase, [co-creation principles](#) may be used to begin stakeholder engagement as early as possible. Co-creation invites input from local organizations, local experts, host country government officials, and the private sector to produce a mutually valued outcome. During this collaboration, consider which of these stakeholders may be able to contribute to the team's understanding of cultural heritage and how the proposed action may affect it (USAID 2022c).

Tips for considering cultural heritage throughout the *strategic planning* process include the following:

- As the Results Framework and Transition Plan are developed, information gathered through research and initial government and community input may be used to gain a better understanding of areas and communities with cultural heritage. The framework does not need to include a detailed plan but can generally define how cultural heritage impacts will be avoided, minimized, or mitigated in ways that fit within the strategic priorities and organizing framework (USAID 2022a). Teams should update the framework as knowledge is gathered about the action area through community meetings and collaborations with cultural heritage stakeholders.
- IEEs can include cultural heritage within their baseline environmental information sections, including locations and local/regional/national laws regarding cultural heritage protection and recommendations for risk management (USAID 2019a). This process will allow USAID staff who are designing projects and activities to begin to understand if and how their work will impact cultural heritage and how they may avoid impacts before implementation. For potential low-risk impacts, mitigation measures can be proposed, beginning with avoidance of cultural heritage impacts.
- Environmental Monitoring and Mitigation Plans (EMMPs) are used for identifying environmental impacts and developing avoidance, monitoring, and mitigation for impacts from USAID actions. The EMMP can be easily expanded to address how the identification of cultural heritage impacts and avoidance, or minimization, monitoring, and mitigation steps can be taken to avoid or reduce impacts (USAID 2021c).
- During midcourse stocktaking, one of the objectives could be to check in with local stakeholders on cultural heritage-related efforts, including avoidance, mitigation, or preservation, and adjust strategies and activities as needed.
- For actions that may have more significant impacts on cultural heritage, consider creating a consultation group and leave it open for the inclusion of new members as new stakeholders are identified throughout the project or intervention development process.

The following sections address how cultural heritage considerations may be included within the USAID Program Cycle.

4.2. PROJECT AND ACTIVITY DESIGN AND IMPLEMENTATION

In addition to the *strategic planning* for cultural heritage described above, a plan for considering cultural heritage as part of *project and activity design and implementation* process must be made as well.

Activities related to cultural heritage avoidance, minimization, mitigation, or preservation should be identified in a way that meets Mission objectives or action goals. Principles of CLA, flexibility, and discretion are imperative to successful implementation of cultural heritage mitigation or preservation measures and successful actions.

Projects or activities can be designed to carry out any specific cultural heritage interventions as a part of the overall action. Protection of cultural heritage may be achieved through work on a larger project goal or may be defined as a purpose or sub-purpose of a specific activity or group of activities (USAID 2021a, 6). A separate activity or sub-activity may be needed to address these impacts or goals, particularly when developing agreements with stakeholders, such as local organizations or governments, to complete mitigation or monitoring. Engaging with and encouraging local stakeholders to lead initiatives can promote locally led development among communities that assist with implementation, monitoring, or evaluation related to cultural heritage impacts. It can also empower and prepare communities to manage cultural heritage beyond the project life cycle by providing them with management tools and connections that can be used more broadly.

Good strategies when working with cultural heritage partners include working collaboratively, being adaptable to change, and learning from partners. Building relationships based on collaboration, adaptability, and active listening will help USAID teams form and maintain trusting and productive working relationships with stakeholders and communities. As mentioned previously, strong relationships enable communities to feel more comfortable sharing their culture and traditions, assisting with identifying, avoiding, and minimizing cultural heritage impacts, collaborating on creative solutions to these impacts, and assisting with monitoring and evaluation activities.

Tips for considering cultural heritage during the project and activity design and implementation process include the following:

1. Consider the overall need for this project or activity and ask, “How does cultural heritage fit into this?” Determine whether there are opportunities to design the project or activity in a way that avoids or minimizes cultural heritage impacts. If cultural heritage impacts will be mitigated, then consider what activities, including monitoring, may be needed to ensure this mitigation.
2. When identifying the project design team, determine whether members of the team have experience with environmental matters related to cultural heritage. If not, consider whether someone with such experience can be added to the team, or if a USAID or State Department Cultural Heritage expert can be available for the team’s questions regarding cultural heritage.
3. When establishing cultural heritage parameters, consider the purpose of the action and the mission objectives, the risk level for affecting cultural heritage, an initial theory of change, and an adaptable plan for implementation.
4. Consider how stakeholder engagement can be leveraged or use co-creation to design projects or activities to strengthen local ownership and find creative approaches to project goals.
5. Determine whether and how cultural heritage intersects with the mandatory analyses of gender, environment, and climate change (USAID 2021f; 2022a). Consider how certain groups may be disproportionately affected if cultural heritage is damaged or changed, such as women, Indigenous Peoples, or other underrepresented or vulnerable groups.

6. If there is a cultural landscape in the action area, engage with stakeholders to determine how its natural environment or human-made features may be changed by the action. Also consider how climate change or measures meant to mitigate climate change may impact these features.
7. Consider how cultural heritage monitoring, evaluation, and CLA will be incorporated into projects and activities and how stakeholders may assist in designing or completing this work through CFPs or other strategies.

4.3. COLLABORATION, LEARNING, AND ADAPTING

Collaboration, Learning, and Adapting (CLA) are collectively relevant to all parts of the Program Cycle and can help identify, understand, and respond to potential effects on cultural heritage. ADS 201 guidance notes that approaches to CLA include identifying opportunities to test and explore an activity's theory of change, identifying gaps in the technical knowledge base, as well as planning for and engaging in meetings with partners to reflect on progress and encourage collaboration (USAID 2022a, 82). These components of CLA integrate well with a program-cycle approach that incorporates consideration of cultural heritage. Cultural heritage can be incorporated into multiple processes that promote CLA, including consultation plans, regular and ongoing community engagement, regular monitoring, and site visits, during pause and reflects, and within the EMMP reporting (i.e., within Environmental Monitoring and Mitigation Reports [EMMRs]). For actions that are likely to affect cultural heritage, ongoing community engagement provides opportunities to assess progress and check in with cultural heritage stakeholders. For these check-ins: "focus on challenges and successes in implementation to date, changes in the operating environment or context that could affect programming, opportunities to better collaborate or influence other actors, emerging risks that threaten the achievement of objectives, and/or other relevant topics" (USAID 2022a, 76).

A dedication to CLA will help to build trusting and effective working relationships with cultural heritage stakeholders and partners that aid future actions and benefit USAID's reputation. These relationships can be very helpful for any future actions in the same geographic area and can provide lessons learned that may be applicable to other parts of the world.

During the Strategic Planning and Project and Activity Design and Implementation processes, USAID staff and Implementing Partners may be considering or designing measures to avoid, minimize, or mitigate unwanted effects on cultural heritage. These measures will benefit from stakeholder engagement and consultation through CLA. The next section provides guidance on good practices for the development of these measures. Table 2 provides suggestions of mitigation considerations for various types of impacts that an action, project, or intervention may have on cultural heritage.

DEVELOPING AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

If initial research and stakeholder consultation indicate that an action could impact cultural heritage, then planning to avoid impacts during the initial project design phase is critical. If avoidance of impacts is not possible, creative minimization, monitoring, mitigation, or rehabilitation may be incorporated into the action's designs. Teams can ensure that these plans are undertaken appropriately throughout the monitoring and evaluation phases. The most important part of developing these measures is to work with local community members and stakeholders to tailor these efforts to their needs and values. If good relationships with stakeholders have been developed throughout the project's life cycle, then it will be easier to develop and implement creative and collaborative ideas.

When developing mitigation measures, it is important to be flexible, creative, and respectful of the input, values, perspectives, and interests of all cultural heritage stakeholders. The mitigation hierarchy includes the following priorities:

- Avoiding impacts through design and location changes;
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- Repairing, rehabilitating, or restoring affected cultural heritage, or preserving cultural heritage in situ without major alterations;
- Reducing or eliminating impacts over time through maintenance operations over the life of the project; and
- Compensating for the impacts by replacing or providing substitute resources or environments.*

Several standard mitigation examples used to address cultural heritage impacts when avoidance and minimization is not possible include the following:

- Creating public education or outreach strategies to inform the public about cultural heritage (e.g., booklets, museum displays, or online resources);
- Developing community preservation tools, such as cultural heritage management plans (see textbox below), that can be used by the community in the future; and
- Documenting cultural heritage through photographs, measured drawing, laser scanning, or other feasible methods. Consider hiring a trained professional to complete this type of work according to the country's or region's standards and preferences. This more intensive option is better suited to situations where cultural heritage may be irrevocably changed or demolished.

Mitigating cultural heritage for USAID actions will involve action-specific considerations and planning and can be tailored to the communities and cultural values of an action area.

CULTURAL HERITAGE MANAGEMENT PLANS

Cultural Heritage Management Plans (CHMPs) are often used for large areas rich with cultural heritage resources, or when a smaller number of resources may be affected by multiple types of development. When working in countries or regions with abundant known cultural heritage, identify whether a CHMP exists and incorporate best practices for avoiding, minimizing, or mitigating impacts on cultural heritage into the action planning process and EMMP. CHMPs may also be developed as a mitigation measure to address or resolve impacts to cultural heritage. USAID's guidance on developing Protected Area Management Plans is a helpful resource when planning to manage cultural heritage during completion of the EMMP (USAID 2009, 3–6). The strategies and tips for Protected Area Management Plans are also applicable to the development of CHMPs or similar plans for cultural heritage protection that may be developed for mitigation purposes. Some tips for crafting cultural heritage management plans (CHMPs) include the following:

- If there are national, regional, or local plans for cultural heritage available, use these plans as a template or starting point to craft the mitigation or management plans.
- Use social assessments or information gathered during community meetings and from stakeholder engagement efforts that have already been conducted to aid in developing the CHMP.
- Review the mitigation and monitoring suggestions developed by USAID for ecotourism and construction effects (USAID 2009, 7–13; 2017b, 3–6).

*40 CFR §1508.20 (Protection of the Environment, National Environmental Policy Act Implementing Regulations, Mitigation)

TABLE 2. POTENTIAL IMPACTS ON CULTURAL HERITAGE AND POSSIBLE RESPONSES

IMPACTS ON CULTURAL HERITAGE	POSSIBLE RESPONSES
Emissions that degrade air quality and contribute to climate change.	
<ul style="list-style-type: none"> • May diminish the experience of local and nonlocal visitors to cultural heritage. • May affect wildlife associated with traditional practices or landscapes. 	<ul style="list-style-type: none"> • Consider alternative power options that reduce emissions. • Work with partners to find other solutions or ways of executing the project that will reduce emissions.
Noise or vibration effects that may be nuisances or affect wildlife or communities.	
<ul style="list-style-type: none"> • May affect elements that are integral to cultural heritage, such as quiet spaces used for meditation, worship, or other traditional activities. • May affect wildlife associated with traditional practices or landscapes. 	<ul style="list-style-type: none"> • Identify times when noise should be avoided (e.g., cultural or religious events). • Be selective in equipment used— choose quieter options when feasible. • Use noise barriers or other noise attenuating features or elements.
Habitat removal, displacement of species.	
<ul style="list-style-type: none"> • May introduce new elements to the historic or natural setting associated with cultural heritage. • May destroy culturally valuable natural resources. 	<ul style="list-style-type: none"> • Consider design or location changes to avoid effects. • Consult with the community and natural resource experts to find solutions. • Include habitat revitalization in project design during post-construction period.
Discharge or runoff from construction sites or products (e.g., waste, insecticides, biocides).	
<ul style="list-style-type: none"> • May cause contamination of land or water that may be a part of a cultural landscape or site. Contamination may result in elements of the landscape or cultural heritage not being safe for traditional uses. 	<ul style="list-style-type: none"> • Consider wastewater management and runoff control in the project design and during construction and operation. • Prepare a spill/effluent management plan before the project begins.
Reduced access to water or land.	
<ul style="list-style-type: none"> • May affect the historic or natural setting associated with cultural heritage, wildlife, natural resources or landscapes, or the ability of local communities to continue practicing specific traditions (e.g., bathing, hunting, or other traditions or rituals associated with cultural heritage and traditional practices). 	<ul style="list-style-type: none"> • Consider design or location changes to avoid effects. • Identify times when access should be available if the interruption is temporary (e.g., cultural or religious events).
Increased permanent or temporary travel or traffic from vehicles or other traffic.	
<ul style="list-style-type: none"> • Temporary increases may not have long-term effects, but the construction or widening of travel ways may increase noise and air pollution near cultural heritage. 	<ul style="list-style-type: none"> • Cumulative effects of increased travel and traffic should be considered along with other development and infrastructure projects planned for the area. • Consider design changes to minimize effects.
Removal or damage to tangible or intangible cultural heritage.	
<ul style="list-style-type: none"> • Direct negative effects on cultural heritage—loss of history, culture, and tradition, which may be immediate or long-term effects. 	<ul style="list-style-type: none"> • Consider design or location changes to avoid effects. • Consider relocation of the heritage resource if it is feasible or applicable based on historic context. • Work with communities to develop creative, inclusive, and meaningful mitigation or solutions.
Construction of new buildings, infrastructure, and other structures.	
<ul style="list-style-type: none"> • May introduce new visual, audible, or modern elements to the environment that interrupt the historic setting associated with cultural heritage. 	<ul style="list-style-type: none"> • Include vegetative screenings in plans. • Work with communities to design structures to be compatible with their settings (e.g., color, material, scale).
Excavation for construction or other purposes.	
<ul style="list-style-type: none"> • May affect known and unknown archaeological sites or other cultural heritage through partial or full destruction. 	<ul style="list-style-type: none"> • Consider design or location changes to avoid effects. • Work with communities to understand the history of the area being excavated and assess the risk of damaging cultural heritage. • Conduct preliminary surveys to understand the historic context and predict what might be found.
Introduction of new economic activities.	
<ul style="list-style-type: none"> • May affect traditional activities, including traditional livelihoods, crafts, trades, or agricultural practices. 	<ul style="list-style-type: none"> • Engage with local communities that work in similar sectors or livelihoods that represent traditional ways of working or craftsmanship. • Consider how new activities might work in tandem with traditional approaches rather than usurp them.

4.4. MONITORING CULTURAL HERITAGE IMPACTS AND MITIGATION PLANS

Monitoring is key to ensuring that unanticipated impacts to cultural heritage are avoided; confirming that avoidance, minimization, and mitigation efforts are being implemented; and determining the efficacy of these efforts. If an action is impacting cultural heritage, checkpoints for stakeholder consultation can be built into the steps of the environmental review process. Stakeholder collaboration during monitoring promotes locally led development and will help keep stakeholders informed and able to celebrate successes and address challenges, opportunities, or changes as needed. When developing Monitoring, Evaluation, and Learning (MEL) Plans, consider asking cultural heritage stakeholders to weigh-in on the plans. Stakeholders’ buy-in and perspectives relative to cultural heritage impacts can be formalized through contracts or cooperative agreements with stakeholders or other organizations, direct agreements with partner governments, or task orders that may relate to cultural heritage mitigation (USAID 2021f, 2).

Stakeholders can also contribute to successful implementation and monitoring. They can advise on avoidance, minimization, and mitigation strategies and can assist with monitoring activities. Table 3 presents guidance and questions for understanding impacts to cultural heritage and how these impacts can be addressed when conducting various monitoring efforts.

TABLE 3. CONSIDERING CULTURAL HERITAGE DURING MONITORING

MONITORING PROCESS	GUIDANCE AND POTENTIAL QUESTIONS TO ASK DURING MONITORING
<p>Context Monitoring: As the action is ongoing, it is critical to remain informed as conditions change, particularly if risks have been identified in the design and planning phase. Chance Find Procedures (CFP) can help ensure that if the context of an action changes, teams are ready to respond.</p>	<ul style="list-style-type: none"> • Have project or activity components changed and, if so, how will the changes impact cultural heritage? • Have there been any chance finds, such as previously unknown archaeological sites? If so, was the CFP followed?
<p>Performance Monitoring: Ongoing stakeholder engagement is key to understanding how actions are impacting cultural heritage. Both qualitative and quantitative methods may be used to understand how well projects, activities, and strategies are being implemented.</p>	<ul style="list-style-type: none"> • Have the avoidance, minimization, mitigation, or other measures been implemented? <ul style="list-style-type: none"> – If so, how well was this done? – What measures are outstanding and how will they be implemented? Are changes in the implementation process needed to ensure this work is completed sufficiently and appropriately? • Have avoidance, minimization, mitigation, or other measures been successful in addressing the action’s impacts that were initially identified? • Are any changes needed in the strategy to make the cultural heritage site, building, or landscape accessible for local communities or to accommodate other unanticipated impacts? • Have the objectives regarding cultural heritage been achieved through this work?

TABLE 3. CONSIDERING CULTURAL HERITAGE DURING MONITORING

MONITORING PROCESS	GUIDANCE AND POTENTIAL QUESTIONS TO ASK DURING MONITORING
<p>Complementary Monitoring: If other tools that would be helpful in monitoring cultural heritage mitigation or impacts are available, they may also be adopted. Such tools may include monitoring approaches already being used in the action’s country or region, or new strategies developed in consultation with cultural heritage stakeholders. Different approaches can be used to measure unintended results, perspectives, or various other factors that have affected implementation or success.</p>	<ul style="list-style-type: none"> • What local, regional, national, or international tools for mitigation and monitoring are available for this project area? • What adaptations are needed from available resources to meet the needs of this particular Mission, project, or activity while addressing impacts to cultural heritage? • How can the team leverage available tools, like CFPs, to account for unanticipated impacts or for use when traditional monitoring methods are not possible? How can stakeholders inform the development of these adaptive tools?

Principles of [complexity-aware monitoring](#) are also applicable if an action will have complex or unknown impacts on cultural heritage resources.² The consideration of interrelationships, perspectives, and boundaries is particularly important for such projects (USAID 2021d). Working with stakeholders throughout the *monitoring* process can enable USAID to address changes in project or activity plans and opportunities in an efficient and effective manner.

4.5. EVALUATION OF CULTURAL HERITAGE IMPACTS AND MITIGATION

Evaluations can occur at any time in the project life cycle and may be outlined in EMMR and MEL plans. Cultural heritage considerations can be completed within performance evaluations rather than as separate tasks. Some considerations for including cultural heritage in evaluation efforts include the following:

- As evaluation statements of work are planned and organized, consider what questions need to be answered related to cultural heritage. Gaining knowledge about and an understanding of cultural heritage during the planning stage will enable cultural heritage goals and considerations to be incorporated into evaluations consistently and appropriately, rather than being a last-minute addition. A team member or local stakeholder who can help evaluate cultural heritage concerns or specific methods may also be added to the evaluation team (USAID 2016c, 5-6).
- For the evaluation of cultural resource impacts and related activities, focus groups or community interviews with stakeholders may provide the needed information. Consider inviting cultural heritage stakeholders to assist in the development of the performance evaluation and to join evaluation meetings to make the information gathering process more efficient.
 - Speaking with key cultural heritage stakeholders who will be able to provide a wide range of information and feedback on cultural heritage impacts facilitates a comprehensive evaluation. Invite diverse and underrepresented and vulnerable groups to these conversations whenever possible.

² Complexity-aware monitoring can be used during performance or context monitoring to address performance monitoring’s three blind spots, synchronize monitoring with a pace of change, and consider interrelationships, perspectives, and boundaries.

- The Stakeholder Participation Planning Tool may be used to guide the evaluation development and engagement with cultural heritage stakeholders (USAID 2020b).
- As the evaluation is prepared, consider how sensitive or protected cultural heritage information will be kept confidential as requested by the community.

Cultural heritage considerations may be included in performance evaluations and can enable the team to better understand how well they collaborated with communities and stakeholders and how improvements can be made for future actions (USAID 2022a, 97). Some cultural heritage questions for consideration within these evaluations may include the following:

- What were the overall impacts on cultural heritage from this action? To what extent did these impacts match with what was initially expected?
- How well was cultural heritage understood and identified around the action site? Did background research provide enough information to draw conclusions, or was collaboration with the community needed to reach these conclusions? Was USAID able to build strong relationships with cultural heritage stakeholders?
- How can effective collaboration be incorporated into future actions in this country or region based on these relationships?
- Were the project and cultural heritage goals achieved in an effective way? If so, what helped the project reach these goals? What hindered the achievement of these goals?
- What lessons were learned from this action that may inform future actions addressing similar issues related to cultural heritage?
- To what extent were multiple points of view considered throughout the process of cultural heritage identification, impacts assessments, and preservation (as applicable)? For instance, were various cultural and vulnerable groups involved in this process?

5. CULTURAL HERITAGE CONSIDERATIONS SUMMARY

To help teams address cultural heritage adequately and consistently, this summary of cultural heritage considerations for USAID actions provides guidance for incorporating these considerations throughout the Program Cycle:

- During Country/Regional Strategic Planning, consider the risk level of causing impacts on cultural heritage based on the context of the action’s scope of work and geographic location.
- As community meetings are being conducted for the action, including during Project and Activity Design, questions pertaining to cultural heritage can be included. Questions may be developed based on research to gather sufficient information to assess potential impacts. Several suggested questions include the following:
 - What is already known about cultural heritage in this area?
 - Have a variety of resources been reviewed to find out more about cultural heritage in the action area?

- Have potential intangible cultural heritage activities, events, views, vistas, spiritual aspects, or traditional practices, including craftsmanship, folkways, or ways of living, been discussed with stakeholders?
- What other information is needed?
- Reaching out to potential cultural heritage stakeholders regularly, or as needed depending on the scope of potential impacts, is key to receiving timely and actionable information to help answer some of these questions. This is a key part of CLA.
- Once cultural heritage resources and impacts are understood, assessing how the action will or will not affect them will facilitate identification of mitigation measures. Consider the design of project-related activities and how they may interact with cultural heritage physically, visually, audibly, or otherwise.
- Consider how impacts may be avoided, minimized, or mitigated during the Project or Activity Implementation phase of the action.
 - Determine if there is a local, regional, or national CHMP or other guidance that may inform the approach to avoiding, minimizing, or mitigation potential impacts.
 - Develop avoidance, minimization, mitigation, or other measures to address impacts in collaboration with cultural heritage stakeholders.
 - Consider whether there are ways to enhance benefits and opportunities for cultural heritage through project activities.
- Consider how monitoring of the cultural heritage avoidance, minimization, or mitigation measures can be incorporated into monitoring plans for other aspects of the action during the Project or Activity Implementation phase.
 - Work with cultural heritage stakeholders to create a schedule of when mitigation measures, monitoring, and evaluation should be planned or implemented.
 - Consider how local communities can be directly involved in completing these activities to encourage project support, stakeholder engagement, and locally led development.
- Continue to collaborate with and learn from the local communities throughout the project life cycle, including during Monitoring and Evaluation, and beyond (see Figure 1).
- Consider how strategies can be adapted to other future actions during the Evaluation phase.

6. CASE STUDIES

This section presents case studies of potential USAID actions and the cultural heritage impacts that may result. Each example includes suggestions for ways to consider these impacts, engage stakeholders, and work with these stakeholders to avoid or minimize impacts.

EXAMPLE 1: CLEAN ENERGY DEVELOPMENT

An action involves investing in clean energy development. The implementation of a new wind energy facility will reduce reliance on fossil fuels, an objective linked to overarching goals of combating climate change and decreasing pollution caused by the burning of fossil fuels. The action involves support for the

construction of tall wind turbines, several hundred feet in height, which will be visible for many miles across land. The turbines will be placed along the ridges of tall hills (or in wide-open plains or deserts) over several miles. In the valleys and surrounding hills, new substations, converters, and transmission lines will be constructed to connect to the existing infrastructure. These new facilities will cut through a historic landscape that features ruins of former villages as well as natural features, including a river and forest, which have been used by groups living in this area for food, water, ceremonial practices, and other resources for centuries.

SUGGESTED ACTIONS

- Engage with local communities and cultural heritage stakeholders at initial community meetings to discuss the impacts of the action. Consultation may include Indigenous Peoples, scholars with knowledge of the history of the area, government officials, and other stakeholders.
- Work with stakeholders to consider relocating the action to an area that is less sensitive to cultural and natural heritage.
- If avoidance is not possible, work with these partners to develop ways to minimize or mitigate the impacts.
 - Consider designs that will minimize the visual and physical impacts of the turbines and associated facilities or reduce the number of facilities needed.
 - Determine whether the turbines can be shortened or painted in colors that would make them less noticeable. Can the supporting facilities be constructed in less sensitive locations? How can vegetation removal be minimized, or will vegetation be planted to mitigate removal?

EXAMPLE 2: WATER ACCESS AND SANITATION

An action to improve water access and sanitation in a historic but growing village will include the installation of new distribution and sewage pipes and will contribute new technologies to improve water treatment facilities. The construction will disturb the historic roadways and walkways in the village and introduce new, modern elements into the area.

SUGGESTED ACTIONS

- Engage with the village and cultural heritage stakeholders during action planning meetings to discuss these impacts. Ask what their goals are for this action regarding protecting cultural heritage while meeting the water access and sanitation needs of the citizens.
- Work with stakeholders to determine whether there are alternative locations or construction options for the water and sanitation system that would avoid the historic roadways and walkways.
- Work with stakeholders to develop ways to minimize or mitigate the visual impacts.
 - Can the new elements be disguised or hidden in a way that makes them less intrusive? If they are to be buried beneath roadways or walkways, will these places be restored to their previous condition?

- Consider whether the new elements can be disguised or hidden in a way that makes them less intrusive. If they are to be buried beneath roadways or walkways, consider whether these places will be restored to their previous condition.

EXAMPLE 3: ECONOMIC DEVELOPMENT

An action to improve and expand economic development calls for the conversion of land to new fields for agricultural production. The action will create jobs, provide food, and improve the economic condition of the community. The areas that will be converted to these uses are adjacent to known archaeological sites, and locals and experts anticipate that unknown cultural resources may be uncovered during project or activity implementation.

SUGGESTED ACTIONS

- Engage with cultural heritage stakeholders to understand where sensitive archaeological areas or sites may be located or areas that should be avoided if they do not wish to reveal specific locations.
- Work with stakeholders to develop ways to avoid these sites, minimize ground disturbance, or develop mitigation measures for sites that are known and will be affected.
- Develop a monitoring plan and CFPs in partnership with archaeological or other cultural heritage leaders in the area.

EXAMPLE 4: INFRASTRUCTURE IMPROVEMENTS & CONSTRUCTION

An action to construct a new bridge will be placed at a location along a river that has significance as a place of gathering for local communities. The communities may congregate there to celebrate, mark specific events or dates, or use the river for daily or traditional practices. The construction of the bridge will limit access to the area of the river that has been used for these purposes for many years, and the bridge will introduce a modern element to this setting.

SUGGESTED ACTIONS

- Work with stakeholders to consider whether the bridge can be built elsewhere, thus avoiding cultural heritage areas.
- If the bridge cannot be relocated, consider whether the bridge can be designed to minimize its visual impact on the area (i.e., make it less intrusive) and reduce times when access to the area would be restricted.
- Engage with the community to find out more about how and when they use this area. Work with the community to develop a construction schedule that will allow them to access the site for their gatherings or events, or at certain times of the day, if feasible, thus minimizing and mitigating the impacts on intangible cultural heritage.

7. RESOURCES FOR FURTHER ASSISTANCE AND INFORMATION

U.S. RESOURCES

- [Advisory Council on Historic Preservation](#)
- [National Park Service](#)
- [U.S. Department of State Cultural Heritage Center](#)

USAID RESOURCES

- [ADS Chapter 204: Environmental Procedures](#)
- [Collaboration Mapping: A Facilitation Guide](#)
- [Implementation Tips for USAID Partners](#)
- [Optional Social Impact Assessment Framework](#)
- [Optional Toolkit for Identifying Indigenous Peoples](#)
- [Participatory Approaches to Natural Resource Management Planning](#)
- [The Program Cycle Learning Study: Findings, Conclusions, and Recommendations from Four Missions](#)
- [Suggested Approaches for Integrating Inclusive Development Across the Program Cycle and in Mission Operations](#)
- [Topic Briefing: An Introduction to Environmental Assessment](#)
- [What Is Locally Led Development?](#)

INTERNATIONAL RESOURCES

- [United Nations Educational, Scientific and Cultural Organization \(UNESCO\)](#)
- [International Council on Monuments and Sites \(ICOMOS\)](#)
- [International Centre for the Study of the Preservation and Restoration of Cultural Property \(ICCROM\)](#)
- [European Bank for Reconstruction and Development: Performance Requirement 8: Cultural Heritage](#)
- [International Union for Conservation of Nature \(IUCN\)](#)

- [The World Bank Environmental and Social Framework](#)

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