

**Sagebrush Ecosystem Program**

201 Roop Street, Suite 101  
Carson City, Nevada 89701  
Telephone (775) 684-8600  
Facsimile (775) 684-8604

www.sagebrusheco.nv.gov



**Kacey KC**, Program Manager  
**Vacant**, Forestry/Wildland Fire  
**Melissa Faigeles**, State Lands  
**Kelly McGowan**, Agriculture  
**Lara Niell**, Wildlife

**STATE OF NEVADA**  
**Sagebrush Ecosystem Program**

**SAGEBRUSH ECOSYSTEM COUNCIL**  
**STAFF REPORT**  
**MEETING DATE: April 9, 2015**

**DATE:** April 8, 2015  
**TO:** Sagebrush Ecosystem Council Members  
**FROM:** Sagebrush Ecosystem Technical Team  
Telephone: 775-684-8600  
**THROUGH:** Kacey KC, Program Manager  
Telephone: 775-684-8600, Email: kaceykc@sagebrusheco.nv.gov  
**SUBJECT:** Continued Work Plan for the Nevada Conservation Credit System

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**SUMMARY**

The purpose of this agenda item is to inform the Council on the SETT's ongoing work to put the Conservation Credit System (CCS) into full operation. At the February 19, 2015 Council meeting, the Council was provided a draft Improvements List. This agenda item provides a revised version of that list as well as a developed Work Plan to complete the Improvements List.

The Council may review attached drafted Improvements List and Work Plan and provide comments to the SETT.

**PREVIOUS ACTION**

**December 4, 2014.** Council gave direction to SETT to develop "adaptive management" list for the CCS.

**February 19, 2015.** Council reviewed February 2015 version of Improvement List.

**DISCUSSION**

During the December 3 and 4, 2014 Council meeting, many items within the CCS were identified as needing further development, improvement, or should be dealt with iteratively through adaptive management. To this end, the SETT developed a list, termed "CCS Improvements List", from that meeting. In addition, the SETT received comments from Council members, stakeholders, as well as internal items identified by the SETT and by Environmental Incentives that were also added to the list.

To develop a path forward to address these issues a "CCS Work Plan" document was also developed. This includes tasks, task leads, and dates. This CCS Work Plan now also includes other on-going CCS task items that may not be identified on the

Improvements List. The Improvements List is a collection of items to be addressed. The Work Plan is the plan to accomplish these items. The Improvements List will now serve as an attachment to the Work Plan. Items found on the Improvements List may not be contained within the Work Plan, because they were not time sensitive to be completed over the next year.

For the Work Plan, three major milestones were used to prioritize work over the next year.

- 1) 2015 CCS Pilot Projects Stage.
- 2) Signing of the MOU with BLM, USFS, DCNR, NDOW, and NDA anticipated June 2015. Revisions to the Manual and HQT to incorporate identified changes will be brought to the Council for the July 2015 meeting to coincide with the signing of the MOU.
- 3) Spring 2016 field data collection.

The first milestone has been set to allow for adequate field sampling to be conducted for pilot projects during the sage-grouse breeding period of 2015.

The second milestone has been set because once the MOU is finalized in June 2015, the CCS will be in use by state and federal agencies, prior to the EIS ROD. Thus the SEP's communications plan for the CCS needs to be finalized so all partners have the necessary training and tools to begin implementing the CCS. Any modifications and outstanding items for the CCS Manual, HQT, and corresponding documents will need to be approved by the SEC for the roll-out of the CCS following the signing of the MOU. The SETT anticipates bringing the revised versions of these documents to the SEC for approval at the July 2015 meeting. Individual components may be brought to the SEC prior to the July 2015 meeting for approval as they become available.

The final milestone was set as the date in which the Verification process and policies will be developed and fully implemented. In 2015, any HQT valuation of credit and debit projects will be done by the SETT. In the long term, this will be accomplished by third party Verifiers, trained and hired by the State. In order to have the Verification process set up, the State will need to implement the Administrative Fee, develop and execute a Verifiers training, and contract with trained Verifiers. The SETT anticipates that this will be fully developed by the beginning of the breeding season field data collection period in 2016.

The Council may read through these two documents and discuss items with the SETT during the Council meeting. If additional items are noted by Council members to be added to the Improvements List or Work Plan, the SETT will take direction.

### **RECOMMENDATION**

No staff recommendations.

### **POSSIBLE MOTION**

No possible motions.

### **Attachments:**

**1: CCS Work Plan**

**2: CCS Improvements List**

id #	Task Outcomes & Products	Product	Notes	Lead	Deadline
<b>Program Design</b>					
1	Update Manual and HQT	Manual/HQT	Final needed by MOU signing		30-Jun-15
1a	How to deal with recent fire on debit sites (ID13)	Manual		Melissa	1-Jun-15
1b	Add BSU to Proximity Factor	Manual		Lara	1-Jun-15
1c	Discuss inclusion of fuel breaks and anthro dist removals as credit projects	Manual		SETT	30-Jun-15
1d	Ability to Control Wildfire Factor (ID25)	Manual		Kacey	1-Jun-15
1e	Develop Additionality Policies (ID27)	Manual		Kelly	30-Jun-15
1f	Eligibility checklist for credit projects (ID38)	Manual		SETT	1-Jun-15
1g	Verification process for debit projects (ID39)	Manual		Melissa	1-Jun-15
1h	Define Mine size and traffic volume (table 3- HQT)	HQT		Lara	30-Jun-15
1i	How do Design Features (minimization actions) impact debit scores (ID20)	HQT		SETT	30-Jun-15
2	Develop and maintain Improvements List	Manual/HQT		Eoin/Kacey	ongoing
3	Define Admin Fee (ID28)	Manual	Final needed by MOU signing	Eoin	1-Jun-15
4	Develop Forms (Management Plan, Participant Contract)	Manual	20 different forms- last appendix of manual		1-Jun-15
5	Develop Calculator	HQT		Eoin	1-Jun-15
6	Seasonal habitat maps	HQT	USGS to develop by June 2015	USGS	30-Jun-15
7	Develop User's Guide (Admin version)	User's Guide	Final needed by MOU signing	Erik	1-Jun-15
7a	Discussion on field sampling methods & intensity (ID14, 17)	User's Guide		Melissa/Lara	17-Apr-15
7b	R/R Score Card Treatment Severity Issue (ID6)	User's Guide		Lara	15-Apr-15
7c	Timing of fieldwork relative to grazing (ID40)	User's Guide		Kelly	30-Jun-15
<b>Program Piloting</b>					
	Define Pilot Projects		Finalize list of projects (2 credits and 2 debits)	Kacey	1-May-15
	Develop Pilot Project Pro Formas			Eoin	30-Apr-15
	Conduct Pilot Project Desktop Analysis			TBD by project	
	Conduct Pilot Project Field Data Collection		Two collection periods -Breeding and Late Brood Rearing	Lara	spring/summer (TBD by project)
	Generate Pilot Project Credit/Debit Calculations			TBD by project	30-Sep-15
	Develop Pilot Project Case Studies			Eoin	30-Dec-15
	Website development			Eoin	30-May-15
<b>Program Operations</b>					
	Develop Federal Agency Operational MOU			Melissa	Jun-15
	Develop and finalize FWS Agreement			Kacey	1-Jul-15
	Marketing for Credit Projects			Kacey	1-May-15
	Define and develop Outreach Materials			SETT	1-Jul-15
	Develop CCS Roll Out for Agencies		Conduct to coincide with signing of MOU	Lara/ Melissa	1-Jun-15
	State contract/admin policy on Verifiers (ID41)			Kacey	1-May-15
	Institute Admin Fee				Sep-15
	Develop and hold Verifier Training programs - different level of training for verifiers (field methods vs desktop and full calculator)		In order to have verifiers ready for 2016 breeding seasons field data collection		fall 2015
	Develop Adaptive Management Plan			Kacey	30-Jul-15
	Develop Operations Handbook		Includes management systems process- deskguide for SETT for CCS	Kacey	1-Jul-16

Improve vs Develop	Product	Topic	Title	Description	Status	Next Steps	Decision Date, Body & Rationale
Development	Manual	Verifiers	development of verifier program	Policy on verifiers - conflict of interest for verifiers and project proponents, selecting verifiers,. State administration process for managing verifier contracts.	Implementing	Assign a lead to work on. Will need to work closely with DAG and with State Purchasing. (In work plan, operations 3)	Kacey is lead.
Development	Manual	Reversals	Criteria for what is intentional vs unintentional reversals	Need more explicit details on what is intentional vs unintentional reversals.	Implementing	Assign a lead to work on.	
Improvement	HQT	Site-scale Habitat Function	Definition of grasses to include grass-likes (graminoids)	Grasses and grass-likes needs to be clarified in HQT and User's Guide	Implementing	Edits made to HQT and User's guide (in work plan design 9a)	
Improvement	HQT	Edits from TRCP	Mitigation Ratio vs. Habitat Function	Be more explicit and articulate the rationale for excluding landscape-scale/2nd order attributes in the calculation of habitat function, and that instead they are addressed by mitigation ratios. Note in framework overview and 2nd order sections, and reference sections of Manual with information necessary to understand how 2nd order attributes are addressed. Further, add "incorporating landscape priorities/management categories into habitat function" to the Limitations section of the HQT, similar to incorporating limiting habitat into habitat function. This is based on January 2015 feedback from TRCP.	Implementing	(In work plan-design 9a) Need to review TRCP comments and potentially get clarification from EI - needs to be completed for next revision to HQT	
Improvement	HQT	Edits from TRCP	Modification of Indirect Effects	Provide clarity on process and rules, make sure this is not perceived as a loop hole to feds and industry...be explicit that the specific shape of curve and maximum distance will not be negotiable, but rather the Subtype can be changed if justified by science. This is based on January 2015 feedback from TRCP.	Implementing	(In work plan-design 9a) Need to review TRCP comments and potentially get clarification from EI - needs to be completed for next revision to HQT	
Improvement	HQT	Edits from TRCP	Geographic Scope-1st Order	Note in overview and 1st Order sections that the HQT is one of several documents that contain the "policy vision that will guide landscape-scale conservation" needed based on the HAF, and reference the other documents (Manual, State Plan, BLM/FS Land Use Plans). This is based on January 2015 feedback from TRCP.	Implementing	(In work plan-design 9a) Need to review TRCP comments and potentially get clarification from EI - needs to be completed for next revision to HQT	
Development	Other Tools	Eligibility Requirements Check list	Develop checklist	Develop checklist that outlines eligibility requirements. Determining criteria what projects may or may not be appropriate as credit projects. This is outside of HQT Minimum Performance Standards. Does SETT have discretion on what projects can qualify as credit projects.	Implementing	Assign a lead to work on. (verify that EI is not developing) (in work plan, design 16)	
Improvement	Other Tools	Management Plan	Incorporate concept of resist and resil into Management Plan more thoroughly	Capture in the management plan general management that is necessary for a long-term ecologically function site, but not directly measured in HQT. E.g. Flesh out more detailed requirements on trending towards PFC into Management Plan requirements. Also add concepts of upland resist and resil into mgt plan. Add how ecological site descriptions will be used in determining management of sites (both potential of site and improvements to make sure thresholds are not crossed). Add green line and perennial grasses into Management Plans. Also fence flagging.	Implementing	(in work plan, design 19a) Get with EI to get draft management plan. Get copies of other management plans (e.g. NRCS, FWS partners in conservation). Management Plan Lead to incorporate	
Improvement	Manual	Mitigation Ratios	Replace PMUs with BSUs in the Proximity Factor	Modify Proximity Factor to use newly developed BSUs in places of PMUs?	Need Decision	SETT to bring to SEC May Meeting (In work plan, design 12)	SETT decision at 2/24/15 meeting to incorporate 4th level into proximity factor (within PMU, within BSU, with WAFWA MZ, within Nevada)
Development	Manual	Reserve Account	Ability to Control Factor	Do we continue to develop the ability to control factor or decide not to include it or incorporate somewhere else in the CCS	Explore	Kacey to call Rich Harvey and then bring back to SETT/ EI for discussion.(in work plan, design 14)	
Development	Manual	Fee Structure	Create fee structure	Create fee structure for CCS	Explore	SETT to discuss options with EI, would need SEC approval (In work plan, design 3)	
Development	Manual	Public Land Credits	Process for creating credits on public lands	Need to work with federal land management agencies to develop process for third parties to develop credits on public lands and address issues of additionality	Explore	SETT to discuss with federal land management agencies. (in work plan, design 15 and operation 1a)	
Development	Manual	Tribal Lands	Inclusion of Tribal Lands in CCS	Develop a process for developing credits and possibly debits on tribal trust lands	Explore	SETT to discuss with AG and Inter-tribal Council of Nevada	
Improvement	Manual	Editorial Suggestions	Manual Edits from Lee Corum	See Manual v1.0 with red lines send on December 29, 2015	Explore	Work through suggested edits and make appropriate changes to live version (in work plan, design 9a)	2/6/15 - SETT - Decided valuable edits to include
Improvement	Manual	Credit Baseline	Sensitivity of regional standards	Regional standards - should they be more precise? (currently rounded to 5% - should they be 0.1%)	Explore	Sett to discuss.	
Improvement	Manual	Fire	How to deal with recent fire on debit sites	Sites may be naturally regenerating towards sage-grouse habitat but would currently score low in the HQT	Explore	Sett to discuss. Wait to deal with this when it comes up on debit projects (in work plan, design 11)	
Improvement	Manual	Credit Projects	Incorporation of pre-suppression activities	Is there a way to better account for pre-suppression activities, i.e. can just a green strip on its own be a credit project	Explore	SETT to discuss; would need to go to SEC (in work plan, design 13a)	

Improve vs Develop	Product	Topic	Title	Description	Status	Next Steps	Decision Date, Body & Rationale
Improvement	Manual	Credit Projects	Removal of anthropogenic disturbances as a credit project	Is there an alternative way to account for removal of anthropogenic disturbances if there is no protection of indirect disturbance areas? Look at functional acre gain and then make policy decision on them receiving partial credit since they are doing no other measures for the credit project.	Explore	SETT to discuss; would need to go to SEC (in work plan, design 13b)	
Improvement	Manual	Additionality	Use of public funds for credit projects	Need to flesh out what public funds can be used towards credit projects and what cannot due to additionality. Outline policy.	Explore	SETT to discuss with other agencies. (in work plan, design 15)	
Improvement	Manual	Verification of Debit Projects	Modify language on verification of debit projects	Issue that verification of debit projects currently allows for change in debit obligation based on what is on the ground - verification deals with this yearly. However, SETT feels that credit obligation is on the full permit and thus verification yearly shouldn't be needed.	Explore	SETT to outline a proposal on new language. Present to EI. (in work plan, design 17)	
Improvement	Manual	Site-scale Habitat Function	Annual climatic variation effects on understory	How to deal with the impacts of yearly variation on site scale score, Ex) debit project evaluated in drought year. Gordon T and Pete C had comments on this and should be included in discussion.	Explore	SETT to discuss who to include in discussion group	
Improvement	HQT	Disturbance Decay Curves	Incorporate minimization efforts into distance decay curves	Based on minimization guidance in the State Plan, how will distance decay curves be allowed to be modified...need very clear process and rules.	Explore	Sett to discuss. (In work plan - design 5)	
Development	User's Guide	Field Methods	Timing of field work related to grazing	Need to develop a policy on how to deal with timing of field work for sites that have grazing during a permissible window. Only a concern if grazing overlaps with permissible window	Explore	(in work plan, design 18) SETT to have internal discussion. Kelly to bring in concepts from his discussion with NDA folks. Review language in HQT/Manual. Talk with Boies'.	
Improvement	User's Guide	Reserve Account	R&R score sheet - credit projects won't have treatment severity	The R&R score sheet requires assessment of treatment severity which affects final score. For our purposes we are using treatment as the surrogate for unknown disturbance. We'll need to figure out how to deal with this. Should we assume a "moderate severity" fire for all projects? We need to put language in the user's guide to indicate how to deal with this.	Explore	Lara assigned as lead (In work plan, design 10)	
Improvement	User's Guide	Field Methods	Determine transect number per map unit	Work with experts to develop minimum samples for map units based on size and other characteristics	Explore	In work plan, design 7e	From meeting with Lara, Melissa, Erik A (EI), Pete Coates, Gordon Toeves, Lee Turner - Lara and Melissa to meet with Lee Turner to follow methods he uses.
Improvement	Manual	Minimum Performance Standards	MPS Effective?	Is the local-scale and site-scale minimum performance standard achievable by desired projects and screening out undesired projects?	Adaptive Management Monitoring	Need to define criteria to determine desired vs undesired. Then need to monitor for CCS and change process if not working as expected. (In work plan -operations 5)	
Improvement	Manual	Credit Variability	Determine if credit variability tolerance is set appropriately	What should be the starting point and/or guidelines for setting per-project credit variability. It is important that any intentional degradation is identified but natural variation does not create inappropriate administrative effort and credit replacement actions.	Adaptive Management Monitoring	Need to define criteria to determine what is appropriate variation; need to monitor CCS to see if projects are falling within that. If not, it needs to be changed. (In work plan - operations 5)	
Improvement	Manual	Restoration Incentives	Incorporate restoration incentives?	Is there a need for restoration incentives? Need to reconsider if the right mix of credit projects are enrolling to achieve short-term and long-term restoration goals after enough credit projects have been enrolled. Options could include pre-project condition baseline in place of regional standard, a mitigation ratio...	Adaptive Management Monitoring	We should set criteria on what we think is an appropriate balance. Monitor ratio of projects. If we are below the criteria, then we look to implement restoration incentives. If we do not set a threshold, then we will never change management or changing management will be harder. (In work plan - operations 5)	
Improvement	Manual	Mitigation Ratios	Modify mitigation Ratios?	Need to test current ratios for desired result (Habitat Importance Factor and Limiting Seasonal Habitat)	Adaptive Management Monitoring	Need to define criteria to determine what is the desired result, how is that measured and if that is not being met, how they would change. Monitor the system to ensure ratios are set properly. (In work plan -operations 5)	12/4/14 SEC agreed to evaluate ratios after pilot projects (credit and debit) have been evaluated.
Development	HQT	Biological Monitoring	How do we know that credit projects are effective for SG	What credit project and other monitoring is necessary to improve stewardship and restoration action effectiveness, what resources are needed and how will projects be selected?	Adaptive Management Monitoring	Decide how or if to include this. If yes, need to define criteria to determine effectiveness. Then monitor. (In work plan -operations 5)	
Improvement	Manual	Reserve Account	Make R&R Scorecard more relevant	Revise/replace resistance and resilience scorecard to better account for soils in NV.	Table for Later	Explore if solution is identified.	2/6/15 - SETT and TRG did not identify weakness during design of Manual, and no known alternative is available at this time. Sherm was not aware to solution on concerns. If solution is identified, then SETT will explore.
Improvement	Manual	Credit Baseline	Use DRGs instead of WAFWA MZs for Credit Baseline	Utilize Disturbance Response Groups based on ecological site descriptions, to delineate credit baseline site-scale standards instead of WAFWA management zones.	Table for Later	Explore once DRGs are spatially defined and published for the entire state. Get timeline from Tamzen.	2/6/15 - SETT - Decided to Table for Later because underlying information is not currently available.
Improvement	HQT	Site-scale Habitat Function	Site-scale scoring curves	Review site-scale scoring curves to determine when scores should be revised to reduce scores as measurement increases (e.g. the curve should decline when sagebrush is greater than 50%)	Table for Later	Gather TRG to conduct review process - SETT decide to move forward, however not immediate priority (to do in 1+ yr)	
Improvement	HQT	Site-scale Habitat Function	Site-scale scoring curves	Inclusion of invasive forbs in invasive annual grass modifier	Table for Later	None unless research indicates otherwise	2/11/15 - SETT is not aware of literature that would support this
Improvement	HQT	Site-scale Habitat Function	Site-scale scoring curves	Create curves for each WAFWA Zone or ESDs or Disturbance Response Groups	Table for Later	None until information becomes available	2/11/15 - SETT is not aware of literature to define at a finer scale

Improve vs Develop	Product	Topic	Title	Description	Status	Next Steps	Decision Date, Body & Rationale
Improvement	HQT	Field Methods	Minimize field data collection	Use rigorous method like used for the HSI and extensive data to revise attributes and weights, and look for alternative methods to determine site-scale function that requires less field sampling effort.	Table for Later	None until technology improves	
Improvement	HQT	Credit Projects	Indirect benefits for credit projects	Currently the analysis area for credit projects is different than debit projects due to the accounting of indirect effects from debit projects- are there indirect benefits from credit projects? can we account for indirect benefits from credit projects?	Table for Later	None until there is science to account for indirect benefits from individual projects similar to the body of literature on indirect effects of anthropogenic disturbances on sage-grouse. Would also need to address the durability issue to implement.	
Improvement	HQT	Aggregation of HQT parameters	Aggregation of parameters measured by the HQT to calculate habitat function	<p>Many statistical techniques have been developed that combine multiple GIS datasets to provide decision support relative to specific questions. These techniques are collectively known as Multi-criteria Decision Analysis methods. The <i>Simple Additive Weighting</i> method (SAW) is one commonly used technique, and is the technique used in the NV HQT. In this approach, the datasets to be combined are standardized along some scale, each is multiplied by a relative weighting of importance, and the weighted factors are then summed to produce a final score. Though widely used, this method has some drawbacks that make it less than ideal for our purposes. Chief amongst these is the requirement that each factor have very low correlation with any other factor. Violating this principal allows the correlated factors to bias the scoring, reducing the veracity of the results. This constraint would limit the number of factors that could be used to answer any question to only a handful of non-correlated factors. Additionally, spurious results could occur when factors exhibiting inverse relationships are combined. For example, tree canopy cover and dominance of invasive annual grass, two factors defining <i>Current Natural Condition</i>, are both indicators of degraded habitat. Given a scenario where the factors are weighted equally, a hexagon with high tree canopy cover and low invasive grass cover, or the reverse condition, with a dominance of invasive grass but low canopy cover, would both receive a moderate condition score. When the two factors are added together in the simple additive weighting algorithm, they essentially wash each other out.</p> <p>An alternative method could be selected that allows correlated data to be combined. TOPSIS (Technique of Order Preference Similarity to Ideal Solution), treats these correlated factors as complementary. This method scores each parameter based upon its distance to the "ideal solution", defined as the most desirable level of each factor under consideration. As multiple datasets are collected, the ordinal ranking of pixels is refined with the addition of the additional information. This would allow us to combine data at multiple scales to derive the distance in environmental space from a pixel to the ideal solution. This distance is termed the "relative closeness coefficient", which ranges between 0 and 1, with values closer to 1 being more desirable. This coefficient is the score that would be assigned to each pixel evaluated with the HQT.</p>	Table for Later	Need to discuss with Erik Anderson (EI) to get clarification	
Improvement	User's Guide	Field Methods	Line point intercept vs Daubenmire	Should line-point intercept methods be used instead of line-intercept? Line-point intercept is used by AIM and may produce more accurate and consistent results regardless of individual implementing, especially when many technicians will be used and verifications will happen over many, many years. However, Daubenmire method is the same method of the research used to establish the scoring curves. Change methods, you get different results and scoring curves may not be appropriate anymore. If moving forward with Daubenmire, verify the appropriate bins are used in sampling protocol and data sheets, as well scoring curves.	Table for Later	L/M to set up discussion group (This was addressed in work plan, design7d)	From meeting with Lara, Melissa, Erik A (EI), Pete Coates, Gordon Toeves, Lee Turner - Current field methods will be used in 2015. USGS and NDOW are studying issue this summer and will get back to SETT with results for potential change to methods in 2016.
Improvement	Manual	Credit Baseline	Should credit baseline be pre-project conditions rather than regional standard	Is there a need to revise the credit baseline approach to use pre-project condition instead of regional standard?	Considered - Not Implemented	None	Prior to approval of final documents, EI and SETT considered various options for baseline and the one that was chosen seemed to be the best approach to provide incentives: a) without this preservation projects would not be possible, b) it takes away the incentive for people to degrade their land before a credit project, c) it rewards people who have been historically good actors and doesn't reward the bad actors
Improvement	HQT	Site-scale Habitat Function	Incorporate "green line stability rating" into HQT	Incorporate stability of riparian systems into habitat function score using the "green line stability rating" - a quantitative measure	Considered - Not Implemented		12/4/14 - SEC - Informal discussion to exclude metrics of riparian ecosystem function because of EI/SETT/TRG recommendation to exclude based on a) science has not found support for sage-grouse selecting for green line stability (same reason R&R excluded from functional score), b) there are significant financial incentives to improve and maintain riparian ecosystem function, c) these metrics would apply to a very small portion of projects and add more complexity than appropriate, d) PFC is included in Management Plan to ensure Credit Developer is thinking about concept and SETT has opportunity to engage Credit Developer, and e) consideration for low valuation of debit project site due to green line stability that otherwise is functional habitat for sage-grouse.

Improve vs Develop	Product	Topic	Title	Description	Status	Next Steps	Decision Date, Body & Rationale
Improvement	HQT	Site-scale Habitat Function	Further incorporate perennial grass into breeding habitat function	Further incorporate perennial grass into site-scale breeding habitat function because it is an important indicator of resistance and resilience	Considered - Not Implemented		2/6/15 - SETT - Decided not to implement because a) science has not found support for sage-grouse selecting for perennial grass beyond the existing trigger for breeding habitat currently included in the HQT, and b) resistance and resilience is already incorporated into Credit System through the reserve account factor.