

JOE LOMBARDO
Governor



Kathleen Steele, Program Manager
Casey Adkins, Forestry/Wildland Fire
Sarah Hale, State Lands
Cheyenne Acevedo, Wildlife
Skyler Monaghan, Agriculture

Sagebrush Ecosystem Program
201 Roop Street, Suite 101
Carson City, Nevada 89701
Telephone (775) 687-2000

www.sagebrusheco.nv.gov

STATE OF NEVADA
Sagebrush Ecosystem Program

Mitigation Regulations Workshop Minutes
Wednesday, October 30, 2024 – 12:30 p.m.

Physical Location

DCNR Tahoe 2-E Conference Room
901 S Stewart St, Carson City, NV 89701

Virtual Access for the Public

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: 222 113 295 803

Passcode: RGXdMd

Dial in by phone

[+1 775-321-6111, 591487082#](tel:+17753216111591487082) United States, Reno

[Find a local number](#)

Phone conference ID: 591 487 082#

OPEN WORKSHOP, INTRODUCTION @ 12:32 P.M.

In Attendance:

Nick Atiemo -- NOV Big Ledge Mine
Kyle Davis – Pinyon Public Affairs
Ian Dudley – Stantec
Danielle Goodman - Y2 consultants
Adrian Juncosa -- EcoSynthesis
Keith Testermen – Nevada Gold Mines

1. PUBLIC COMMENT

Adrian Juncosa: My name is Adrian Juncosa, and I've been a CCS verifier since the inception of the program in 2016. I'm a long-time expert in vegetation sampling and characterization and have collaborated with Pete Coats' research group on some field research on attempts to improve vegetation sampling and characterization. I'm a big supporter of the program's concept and very supportive of making sure that verifiers so an accurate and rigorous job of all aspects of debit and credit projects so I'm not opposing this amendment. However, I'm concerned that, without revision, the wording of the proposed amendment for NAC232.480 is not entirely in the program's best interest. To my knowledge, the HQT and, critically, the debit/credit calculator spreadsheets never had a public comment period before being implemented. This is unfortunate because there are some significant scientific flaws in it or improvements that could be made, which I pointed out more than once a long time ago to staff who are no longer with the SETT. I was asked not to discuss these concerns with potential applicants and haven't done so, even though I think it's wrong. It's a concern

now because the proposed decertification language seems to me to allow for the program to permanently disqualify verifier if they discuss some aspects of the system that is deemed to be a "misrepresentation" of have an adverse impact on the program. Not only is that free speech concern, but it also makes it even harder than it already is ever to improve the program. I strongly urge to ensure that an addition be made to the proposed amendment that explicitly protects legitimate objective comment on the CCS program. I would also urge careful consideration of whether all of the proposed causes for disciplinary action are justified by what verifiers actually do and sufficiently specific for us to be sure we are in compliance (for example. 8A, 8H). The public has never been able to see what the formulas are in the calculator spreadsheets, so I have no way to know whether my understanding is a misrepresentation of not. But as best as I can determine indirectly, one respect in which the current CCS system is inconsistent with published research results in large overestimates debits, thus imposing a significant financial penalty on some project but not others. Given that there's already an imbalance between anticipated debits and available credits, it would be wise for the long-term viability of the program to address this and other sampling and quantification issues sooner rather than later. Better still, albeit years later than it should have happened, having an open public comment process would be very helpful to the entire program.

2. PRESENTATIONS AND DISCUSSION OF PROPOSED REGULATION

NAC 232.480 refers to the training and certification of verifiers by the Sagebrush Ecosystem Technical Team.

The purpose of the proposed regulation change is to clarify requirements for becoming certified as a verifier for the Conservation Credit System, behavior and violations that would warrant warnings or decertification, and the decertification process.

SETT Staff Sarah Hale started the presentation at 12:39 p.m. outlining the two parts of the amendment 1) clarification of requirement for obtaining verifier cert and 2) cause for disciplinary action and the decertification process.

3. PUBLIC COMMENT

- Adrian Juncosa suggested creating a formalized processes on how comments are received and responded to by CCS Staff.
- Ian Dudley asked why is the driver license requirement (3A)? GIS verification doesn't require a drivers license. SETT Program Manager, Kathleen Steele states that this requirement is likely a relic from the start of the program when verifiers were thought of as state employees and a drivers license is required for state employees. This requirement will be reviewed.
- Danielle Goodman asked those who are already certified, will you be reviewing the listed degree requirements? SETT Program Manager, Kathleen Steele stated that previous verifiers will be grandfathered into these requirements since they were not strictly followed previously.
 - A. Juncosa responded to D. Goodman's question in support of K. Steele's response by stating that GIS didn't exist, or GIS training wasn't available when some were in school but hold work experience.

Any individual or organization not able to attend may submit comments in writing to ksteele@sagebrusheco.nv.gov until close of business on 10/30/24.

4. CLOSE OF WORKSHOP

5. ADJOURNMENT @ 12:54 P.M.

Notice of this meeting was also posted on the Sagebrush Ecosystem Program website at: <http://sagebrusheco.nv.gov>, the Nevada Public Notices Website at <http://notice.nv.gov/>, and the Nevada State Legislature Website at <https://www.leg.state.nv.us/>.

Please contact Kathleen Steele by calling 775-687-2005; or email ksteele@sagebrusheco.nv.gov, to obtain support material for the agenda. Meeting materials will also be posted on the <http://sagebrusheco.nv.gov> website.