

Proposed Additions for CCS Public Lands Credit Projects

Sagebrush Ecosystem Council Meeting
June 3, 2025

Presented by
Casey Adkins, SETT



NEVADA
**SAGEBRUSH ECOSYSTEM
PROGRAM**



Nevada Department of
**CONSERVATION &
NATURAL RESOURCES**



Nevada
Department
of Agriculture



NAC 232.470 Duties of person or entity proposing activity or project on public lands that will cause anthropogenic disturbance; submission of certain information to Sagebrush Ecosystem Technical Team; criteria for approval of mitigation plan by Council. (NRS 232.162)

1. Any person or entity that proposes an activity or a project on public lands, subject to state or federal review, approval or authorization, that will cause an anthropogenic disturbance shall:

(a) ...

(b) ...

(1) ...

(2) Mitigated by:

(I) Acquiring from or transferring a sufficient number of credits in the Nevada Conservation Credit System to offset the number of debits determined pursuant to subparagraph (1); or

(II) Developing a mitigation plan with the Sagebrush Ecosystem Technical Team approved by the Sagebrush Ecosystem Council pursuant to subsection 2 that will generate enough credits to offset the direct and indirect adverse impacts the proposed activity or project will have to the greater sage-grouse or the habitat of the greater sage-grouse.

2. In determining whether to approve a mitigation plan, the Sagebrush Ecosystem Council must consider:

(a) The conservation actions that are included in the plan and the number of credits to be generated from such conservation actions;

(b) The location where the credits will be generated;

(c) The length of time necessary to generate the credits;

(d) The length of time the credits will be maintained;

(e) Whether the credit durability provisions of the plan include appropriate mechanisms to ensure that a sufficient number of credits will be maintained for the appropriate amount of time; and

(f) Whether the financial provisions ensure maintenance of the credits for the duration of the activity or project.

(Added to NAC by Sagebrush Ecosystem Council by R024-19, eff. 10-30-2019)

NAC 232.433 “Nevada Conservation Credit System” defined. (NRS 232.162) “Nevada Conservation Credit System” means the system established by the Sagebrush Ecosystem Council pursuant to NRS 232.162 that calculates:

1. Debits that will be caused by a proposed activity or a project.
2. Credits that are created to protect, enhance or restore sagebrush ecosystems.

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Sagebrush Ecosystem Program

- Goals and Objectives from the Strategic Action Plan that relate to Public Lands Restoration:
 1. **Address threats to Nevada sagebrush ecosystems and Greater Sage-grouse populations through land stewardship and resource management.**
 2. Refine the Nevada Conservation Credit System (CCS) to mitigate anthropogenic impacts and **ensure net conservation gain for Greater Sage-grouse habitat.**
 3. Increase collaboration and outreach to address sagebrush ecosystem threats and support the Programmatic mission.
 - **Objective: Maximize restoration efforts through partnerships.**
 4. Expand scientific knowledge of sagebrush ecosystems, reduce management uncertainty, and **strive for successful conservation.**

Current SEC Approved Project Types

- Pinyon-Juniper Woodland (Phase I and II) Removal
 - Credits released with each treatment action
 - Re-treatments occurs in 10-year intervals after the first treatment for the duration of the debit project
 - One-time prophylactic herbicide treatment in Phase II
- Meadow Improvements
 - Must used SETT approved plant list for seeding and planting efforts
- Anthropogenic Disturbance Removal
 - Project Proponent must own the anthropogenic feature
 - Reclamation or restoration after the removal
 - No maintenance, monitoring, or financial assurances are required

Current Programmatic Policies

- Project Area must be within Management Category Areas
- A Credit Establishment Plan must be approved by the SEC if not one of the SEC approved project types
- Project Proponents must work in coordination with all land use plans, grazing permittees, and other relevant parties
- Financial Assurances are required
- Signed Participant Contract and Mitigation Plan
- The first one-third (1/3) of the total obligation must be met by purchasing credits generated on private lands

Policies for Discussion and Approval

New Project Types:

1. Phase III Removal for Pinyon–Juniper Removal Projects
2. Post-fire or Weed Control Restoration

New Policies for Public Lands Projects:

1. Tiered Credit Release vs. Single Credit Release
2. Removal of the Phasing Factor for Public Lands Projects
3. Removal of the Proximity Factor for Projects in priority areas

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Pinyon-Juniper Woodland Removal

- All Project are required to complete the applicable permitting
 - Cultural, special species status, etc.
- Treatments by PJ Phase Classification
 - Phase I PJ removal only
 - Phase II PJ removal and pre-emergent herbicide
 - ACTION ITEM: Phase III PJ removal, pre-emergent herbicide, and seeding

Pinyon-Juniper Woodland Removal

- Re-treatments in 10-year intervals with a re-treatment 10 years prior to the end of project term
 - EX: For a 30-year term, treatment would occur at year 1 and retreatments would occur at years 10 and 20
 - EX: Terms of greater than 10, and less than 20 are required to do a re-treatment at years 10 and 20
- Credits are released at the completion of the treatment
 - ACTION ITEM: If phase III woodland is removed, requiring the multi-year treatment of herbicide and seeding the credits allocated to the phase III removal would be released at the end of the treatment
- Financial assurances are required to ensure the completion of a re-treatment plan

Summary and Discussion

We propose, Phase III Pinyon-Juniper woodlands be included in the CCS Pinyon-Juniper Woodland Removal Project type with the application of a pre-emergent herbicide and a seeding treatment.

Policies for Discussion and Approval

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Post-fire or Weed Control Restoration

- Examples of Common Projects
 - Post-fire rehabilitation
 - Invasive/noxious weed control
- Examples of Common Treatments
 - Herbicide applications
 - Native forb and grass seedings
 - Sagebrush and other shrub plantings

Post-fire or Weed Control Restoration

- Standard CCS Public Lands Credit Project requirements
 - Project Proponents must work in coordination with all land use plans, grazing permittees, and other relevant parties
 - Financial Assurances
 - Reserve Account Contributions at a flat rate of 25% or 3X the calculated amount
 - Signed Participant Contract and Mitigation Plan
 - The first one-third (1/3) of the total obligation must be met by purchasing private credits
 - 5-year SETT site visit
- **ACTION ITEM: Additional CCS Public Lands Credit Project requirements**
 - Field monitoring for the duration of the project term
 - Annual monitoring for the first 5 years, followed by 5-year monitoring, expect if retreatment occurs then annual monitoring is required for the next 5 years
 - Annual Monitoring Reports and Five-Year Monitoring Reports due to SETT for compliance evaluation
 - 3X the Reserve Account Contributions of the standard calculated reserve account

Summary and Discussion

We propose, Post-fire or Weed Control Restoration becomes a SEC approved CCS Public Lands Credit Project type with the additional requirements outlined

- Field monitoring for the duration of the project term
 - Annual monitoring for the first 5 years of a treatment, followed by 5-year monitoring. If retreatment occurs, then annual monitoring is required for the following 5 years.
- Annual Monitoring Reports and Five-Year Monitoring Reports due to SETT for compliance evaluation
- 3X Reserve Account Contributions

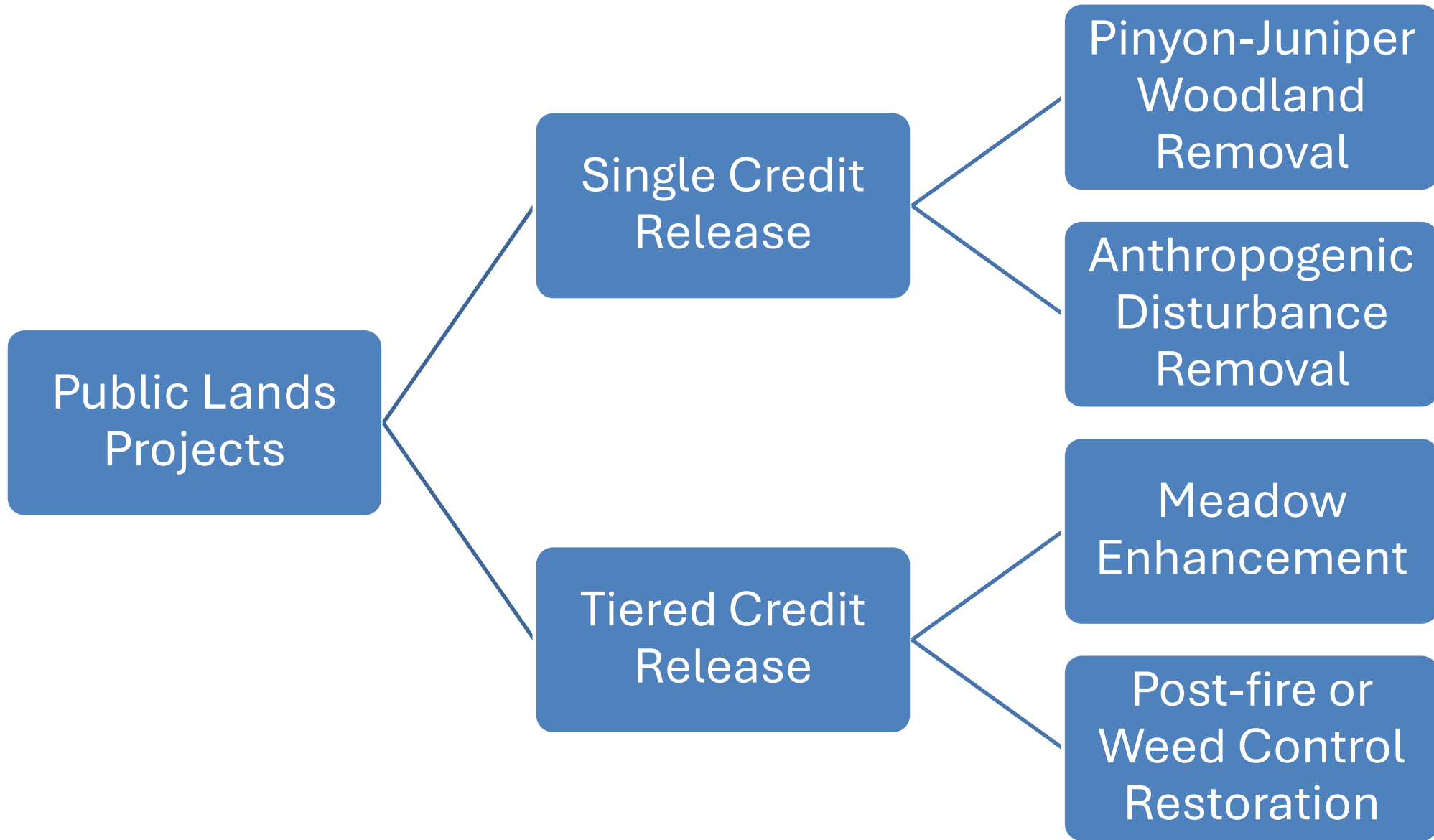
Policies for Discussion and Approval

New Project Types:

1. Phase III removal for Pinyon–Juniper Removal Projects
2. Post-fire or Weed Control Restoration

New Policies for Public Lands Projects:

1. Tiered Credit Release vs. Single Credit Release
2. Removal of the Phasing Factor for Public Lands Projects
3. Removal of the Proximity Factor for Projects in priority areas



Single Credit Release

- Once the CCS-approved treatment is completed per the Project Mitigation Plan the credits are released to the Project Proponent
- Project Types:
 - Pinyon-Juniper Woodland Removal
 - Anthropogenic Disturbance Removal
- Monitoring not required
- Some retreatment is required
- 3X Reserve Account
- Financial Assurances

Tiered Credit Release

- A tiered approach to treatments and credit releases
- Applies to projects when treatments may require or benefit from a tiered or step-wise restoration approach
- Monitoring required for the duration of the project term
- All treatments would be outlined in the Project Mitigation Plan
- Potential Project Types:
 - Meadow Enhancement
 - Post-fire or Weed Control Restoration

What is considered a tier?

- A tier is a group of treatments and/or monitoring actions that would occur within the same timeframe
 - The grouping will be determined project-by-project to best fit the restoration needs and project term
 - Large acreage (> 5,000) project tiers would likely be based on feasible geographic sections of the larger project area
 - Small acreage (< 5,000) project tiers would likely be based on treatment type
- Tiers would be developed in the order of restoration or enhancement priority
 - These decisions would be made by SETT in collaborations with the Project Proponent and all applicable landowners, land managers, and land users

Mitigation Plan

- Similar to private Credit Project Management Plan
- Used for all Public Land Credit Project types
- Documentation of
 - Management Commitments (treatments, treatment and monitoring timelines)
 - Proof applicable land permitting, grazing agreements, and financial assurances, etc.
 - Credit Release Schedule
 - Management Budget

High Level Project Timeline

1. SETT works with Proponent to determine if the project would cover the debit obligation and reserve account contributions
2. The treatments, a project timeline, and the potential credits released are defined within the Mitigation Plan
3. Tier 1 treatments and monitoring occur
4. Monitoring Reports are submitted to SETT for review
5. If Tier 1 is in compliance, SETT would release a proportion of the credits
6. Tier 2 would begin, and this would repeat until the end of the project term

Tiered Credit Release Compliance

- Restoration requirements are complete as mandated in the Mitigation Plan
- Monitoring reports are completed accurately and on time
- The project conditions are not declining—improving or stable (force majeure exempt)
- Financial Assurance requirements are met

Monitoring Procedures

- Before treatments start, SETT would complete a site visit and evaluate the project area for resistance and resilience and its ability to control wildfire
- SETT would provide points per treatment area for monitoring

Monitoring Procedures

- At each sampling location the following would occur;
 - Landscape photo in a specified cardinal direction
 - Nearest sagebrush height within 50ft
 - Daubenmire plot photo
 - Qualitative score card
 - Are there noxious or invasive weeds? None, Spare, Common, or Dominate
 - If fencing is installed, is it in proper condition? Yes or No
- Compiled for Monitoring Report and submitted to SETT



Monitoring Reports

- Similar to private Credit Project reports
- Documentation of
 - All treatment actions
 - Monitoring outputs
 - Photos
 - Qualitative Questionnaire
 - Financial Assurances updates
 - Biological Observations

Tiered Credit Release Schedule Example #1

- Total project acreage of > 25,000
 - 7 Map Units (MU) \approx 4,000 acres each with similar treatment needs

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding	Fencing	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier 1	1	MU 1						
	2	MU 2	MU 1					
Tier 2	3	MU 3	MU 2			MU 1		
	4	MU 4	MU 3			MU 2	MU 1	
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2
Tier 4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3
	8		MU 7			MU 6	MU 5	MU 4
Tier 5	9					MU 7	MU 6	MU 5
	10						MU 7	MU 1 -7

Tiered Credit Release Schedule Example #1

- Total project acreage of > 25,000
 - 7 Map Units (MU) \approx 4,000 acres each with similar treatment needs

Credit
Release #1
→

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding	Fencing	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier 1	1	MU 1						
	2	MU 2	MU 1					
Tier 2	3	MU 3	MU 2			MU 1		
	4	MU 4	MU 3			MU 2	MU 1	
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2
Tier 4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3
	8		MU 7			MU 6	MU 5	MU 4
Tier 5	9					MU 7	MU 6	MU 5
	10						MU 7	MU 1 -7

Tiered Credit Release Schedule Example #1

- Total project acreage of > 25,000
 - 7 Map Units (MU) \approx 4,000 acres each with similar treatment needs

Credit
Release #2
→

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding	Fencing	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier 1	1	MU 1						
	2	MU 2	MU 1					
Tier 2	3	MU 3	MU 2			MU 1		
	4	MU 4	MU 3			MU 2	MU 1	
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2
Tier 4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3
	8		MU 7			MU 6	MU 5	MU 4
Tier 5	9					MU 7	MU 6	MU 5
	10						MU 7	MU 1 -7

Tiered Credit Release Schedule Example #1

- Total project acreage of > 25,000
 - 7 Map Units (MU) \approx 4,000 acres each with similar treatment needs

Credit
Release #3
→

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding	Fencing	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier 1	1	MU 1						
	2	MU 2	MU 1					
Tier 2	3	MU 3	MU 2			MU 1		
	4	MU 4	MU 3			MU 2	MU 1	
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2
Tier 4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3
	8		MU 7			MU 6	MU 5	MU 4
Tier 5	9					MU 7	MU 6	MU 5
	10						MU 7	MU 1 -7

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- Total project acreage of > 25,000
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Tier 1	1	MU 1						
	2	MU 2	MU 1					
Tier 2	3	MU 3	MU 2			MU 1		
	4	MU 4	MU 3			MU 2	MU 1	
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2
Tier 4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3
	8		MU 7			MU 6	MU 5	MU 4
Tier 5	9					MU 7	MU 6	MU 5
	10						MU 7	MU 1 -7

Credit Release #4
→

Tiered Credit Release Schedule Example #1

- Total project acreage of > 25,000
 - 7 Map Units (MU) \approx 4,000 acres each with similar treatment needs

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding	Fencing	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier 1	1	MU 1						
	2	MU 2	MU 1					
Tier 2	3	MU 3	MU 2			MU 1		
	4	MU 4	MU 3			MU 2	MU 1	
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2
Tier 4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3
	8		MU 7			MU 6	MU 5	MU 4
Tier 5	9					MU 7	MU 6	MU 5
	10						MU 7	MU 1 -7

Credit Release #5



Tiered Credit Release Schedule Example #2

- Total project acreage of 4,000
 - 3 Map Units (MU) with differing treatment needs

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding/ Willow Planting	Beaver Dam Analogues (BDAs)	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier1	1	MU1	MU2	MU2	MU3			
	2		MU1			MU2; 3		
Tier2	3					MU1	MU2; 3	
	4						MU1; 2	
Tier3	5							MU2; 3
	6							MU1
Tier4	7							
	8							
Tier5	9							
	10							MU1; 2; 3

Tiered Credit Release Schedule Example #2

- Total project acreage of 4,000
 - 3 Map Units (MU) with differing treatment needs

Credit
Release #1

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding/ Willow Planting	Beaver Dam Analogues (BDAs)	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier1	1	MU1	MU2	MU2	MU3			
	2		MU1			MU2; 3		
Tier2	3					MU1	MU2; 3	
	4						MU1; 2	
Tier3	5							MU2; 3
	6							MU1
Tier4	7							
	8							
Tier5	9							
	10							MU1; 2; 3



Tiered Credit Release Schedule Example #2

- Total project acreage of 4,000
 - 3 Map Units (MU) with differing treatment needs

Credit
Release #2
→

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding/ Willow Planting	Beaver Dam Analogues (BDAs)	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier1	1	MU1	MU2	MU2	MU3			
	2		MU1			MU2; 3		
Tier2	3					MU1	MU2; 3	
	4						MU1; 2	
Tier3	5							MU2; 3
	6							MU1
Tier4	7							
	8							
Tier5	9							
	10							MU1; 2; 3



Tiered Credit Release Schedule Example #2

- Total project acreage of 4,000
 - 3 Map Units (MU) with differing treatment needs

Credit
Release #3
→

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding/ Willow Planting	Beaver Dam Analogues (BDAs)	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier1	1	MU1	MU2	MU2	MU3			
	2		MU1			MU2; 3		
Tier2	3					MU1	MU2; 3	
	4						MU1; 2	
Tier3	5							MU2; 3
	6							MU1
Tier4	7							
	8							
Tier5	9							
	10							MU1; 2; 3

Tiered Credit Release Schedule Example #2

- Total project acreage of 4,000
 - 3 Map Units (MU) with differing treatment needs

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding/ Willow Planting	Beaver Dam Analogues (BDAs)	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier1	1	MU1	MU2	MU2	MU3			
	2		MU1			MU2; 3		
Tier2	3					MU1	MU2; 3	
	4						MU1; 2	
Tier3	5							MU2; 3
	6							MU1
Tier4	7							
	8							
Tier5	9							
	10							MU1; 2; 3

No Credit Release

Tiered Credit Release Schedule Example #2

- Total project acreage of 4,000
 - 3 Map Units (MU) with differing treatment needs

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding/ Willow Planting	Beaver Dam Analogues (BDAs)	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier1	1	MU1	MU2	MU2	MU3			
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Tier2	3					MU1	MU2; 3	
	4						MU1; 2	
Tier3	5							MU2; 3
	6							MU1
Tier4	7							
	8							
Tier5	9							
	10							MU1; 2; 3

Credit Release #4



Current CCS Durability Mechanisms

- Site Monitoring
- Reserve Account Contributions
- Financial Assurances
- Debit Impact Assurances

Current CCS Durability Mechanisms

- Site Monitoring
- Reserve Account Contributions
- Financial Assurances
- Debit Impact Assurances

Mechanisms to Increase Durability

- Monitoring for the Duration of the Project Term
 - Public Lands Credit Project term must be equal to the Debit Project term that it is offsetting
- 3x Reserve Account Contributions
 - Backup credits to restore project conditions in the event of force majeure
 - Since a Proponent has less authority over public lands compared to private, 3-times the number of credits are required for public versus private lands projects

Current Durability Mechanisms

- Monitoring
- Reserve Account
- Financial Assurances
- Debit Impact Assurances

Mechanisms to Increase Durability

- Financial Assurances
 - Must be provided to cover the anticipated average annual costs associated with the management and monitoring of the Project Area
 - ACTION ITEM: Subsequent tier financial assurances are required before credits are released
 - ACTION ITEM: Total project contributions would be required within 10 years of the initial private purchase if the project term is greater than or equal to 30 years
 - ACTION ITEM: Total project contributions would be required within 5 years of the initial private purchase if the project term is less than 30 years

Mechanisms to Increase Durability

Credit Release #1 →

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding	Fencing	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring
Tier 1	1	MU 1						
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	10						MU 7	MU 1 -7

Financial Assurances for Tier 2 required ←

Financial Assurances Scenario

- What if the Proponent stops completing the treatments and/or monitoring?
 - Financial Assurances would be used by the CCS to continue the work

Mechanisms to Increase Durability

- Debit Impact Assurances
 - Similar to the current policy for private Credit Projects
 - The proposed Debit Project would be responsible to offset all invalidated credits within the Public Land Project Area
 - ACTION ITEM: Invalidated credits must be purchased via private Credit Projects
 - ACTION ITEM: Invalidated credits must be purchased with Public Lands credit release schedule

Debit Impact Assurances Scenario

- What if a proposed Debit Project has direct or indirect impacts on the Public Lands Credit Project when those credits have already been released, but the Project term is not finished?
 - The proposed Debit Project Proponent would be responsible to offset the invalidated credits via private credit purchases at initial purchase

Debit Impact Assurances Scenario

- What if a proposed Debit Project invalidates credits that have not be released?
 - The proposed Debit Project Proponent would be responsible to offset the invalidated credits via private credit purchases within the planned credit release schedule or before the Debit Project completes its' own obligation
 - The Public Land Project Proponent would still complete the treatments within the indirect region

Summary and Discussion

We propose a Tiered Credit Release be used for Meadow Enhancement and Post-fire and Weed Control project types, with the presented requirements and restrictions.

Phasing Factor

- Credits are subject to a phasing factor if not all credits are purchased prior to breaking ground
 - Total credit obligation is divided into three phases
 - The 1st phase must meet the one-third requirement
 - The remaining credits must be acquired within 10 years of the first transaction
- A credit phasing factor of 1.05 is applied to the 2nd and 3rd phase purchases
 - EX: Total debit amount of 110
 - Phase 1 = 36.6 \approx 37 credits due
 - Phase 2 = 36.5 * 1.05 = 38.325 \approx 38 credits due
 - Phase 3 = 36.5 * 1.05 = 38.325 \approx 38 credits due
- Anticipated to be discontinued by 2029

Phasing Factor

- ACTION ITEM: Waive the Phasing Factor from Public Land Credit Projects, but treatments must start within 5-years of the initial one-third credit purchase

Justification:

- Most effective restoration practices require year-to-year effort making them innately phased
- Public land projects are subject to a greater number of limitations outside of the Proponents control which may cause project delays
 - Seasonal/weather conditions
 - Wildlife disturbance restrictions (e.g., lekking and migration seasons)

Summary and Discussion

We propose, to waive the Phasing Factor from Public Land Credit Projects, with the requirement that treatments start within 5-years of the initial one-third private credit purchase.

Proximity Factor

- Incentivizes to offset obligation in close proximity to debit sites to increase the likelihood that the mitigation serves the same populations of birds that are adversely impacted
- **ACTION ITEM:** If the majority of a Public Land Credit Project area is within the SAP Priority Areas, it would be exempt from a proximity factor
 - Projects entirely or mostly outside of the SAP areas would not be exempt from a proximity factor



Proximity Factor

- Public Lands Projects within proximity of the debit site would take preference over potential projects within the SAP Priority Areas
- Justification
 - These areas have been determined as GRSG habitat priority areas with our collaborators
 - Goal 1, Objective 2 for the SAP

Summary and Discussion

We propose, Public Lands Credit Projects be exempt from Proximity Factors if the Project Area is largely within the SAP designated Priority Areas.