



CCS – Current Procedures

Friday, December 13, 2024





Purpose

- Review the timelines for Debit projects in the CCS compared to the NEPA process
 - Streamline
 - More aligned with federal processes
 - Increase transparency and understanding for Debit projects



Outline

- NEPA Process
- Debit Project Enters CCS
- Competing land use in our documents
- Rules for Version Control
- When debits are final with QA
- Option 1
- Option 2
- Option 3
- Option 4



NEPA Process

- Pre-NEPA
- NEPA
- End of NEPA

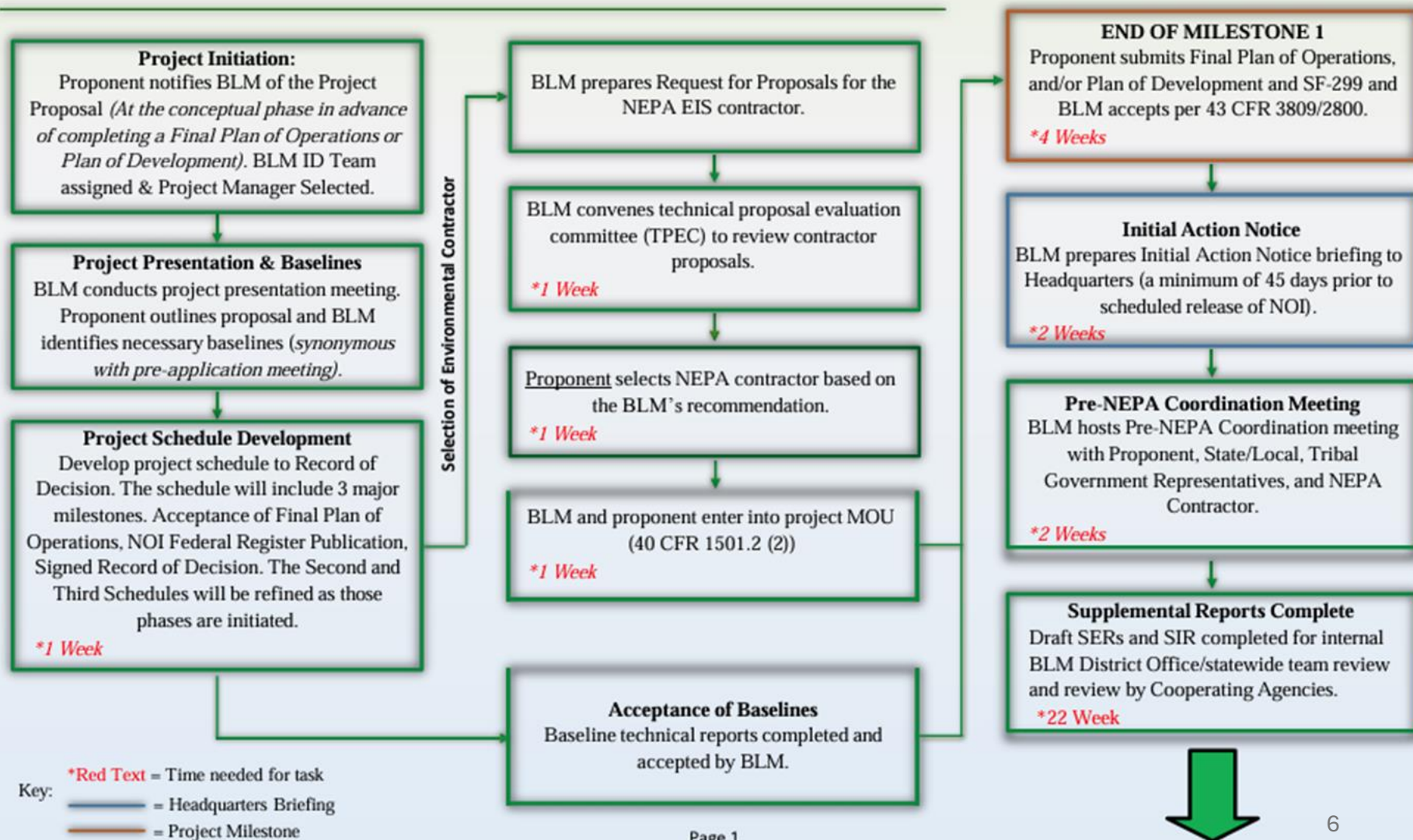


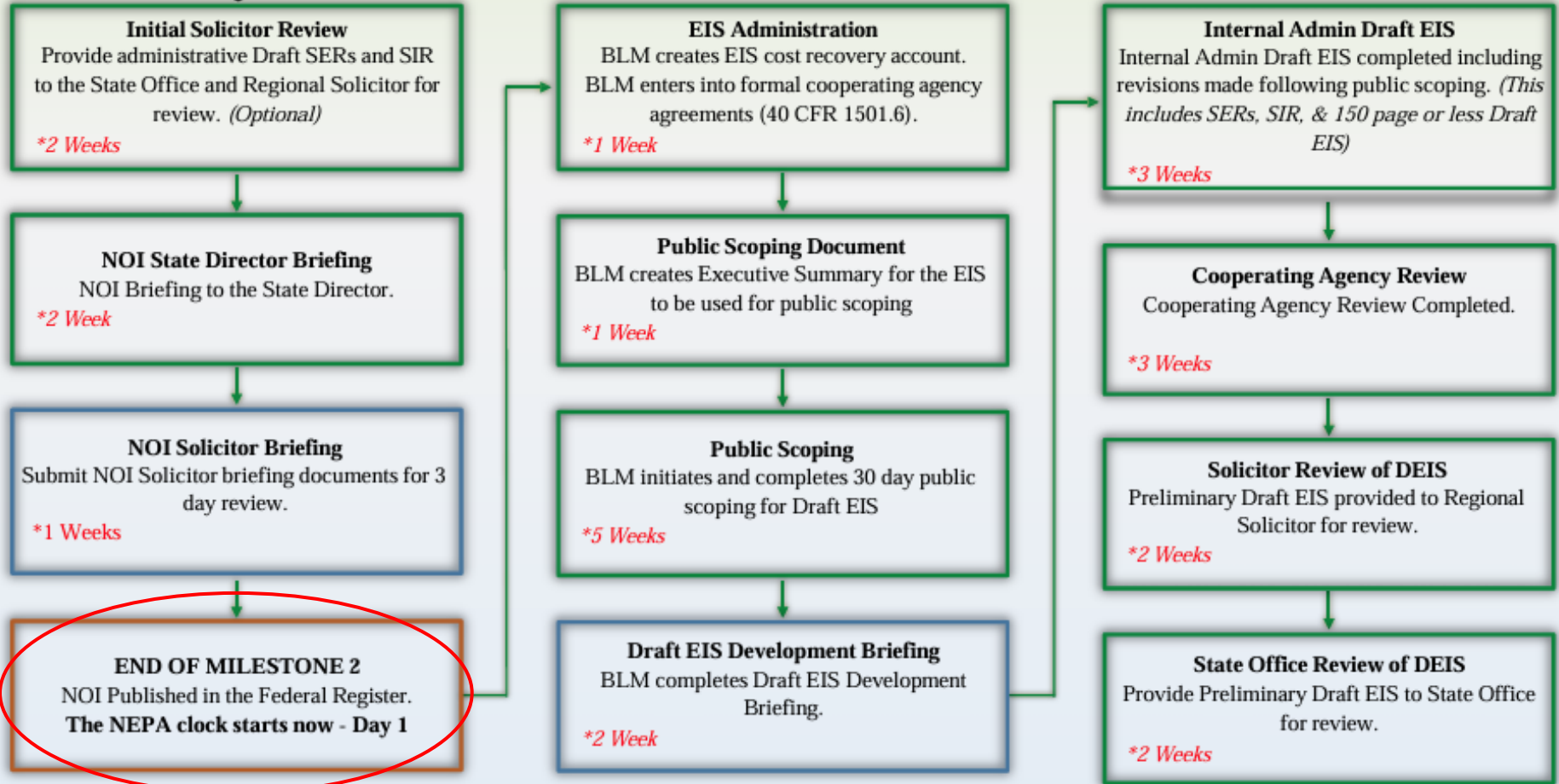
Pre-NEPA

- Project Creation
- Creation of Project Proposal
- Plan of Operations
- NEPA schedule
- Baseline technical reports completed and accepted
- Creation of Supplemental Reports
 - Standard Environmental Reference (SER)
 - Supplemental Information Report (SIR)
- Pre-NEPA ends with a published Notice of Intent (NOI) or the ROW or date of notification/public participation



Attachment 2.A: Project Management Flow Chart



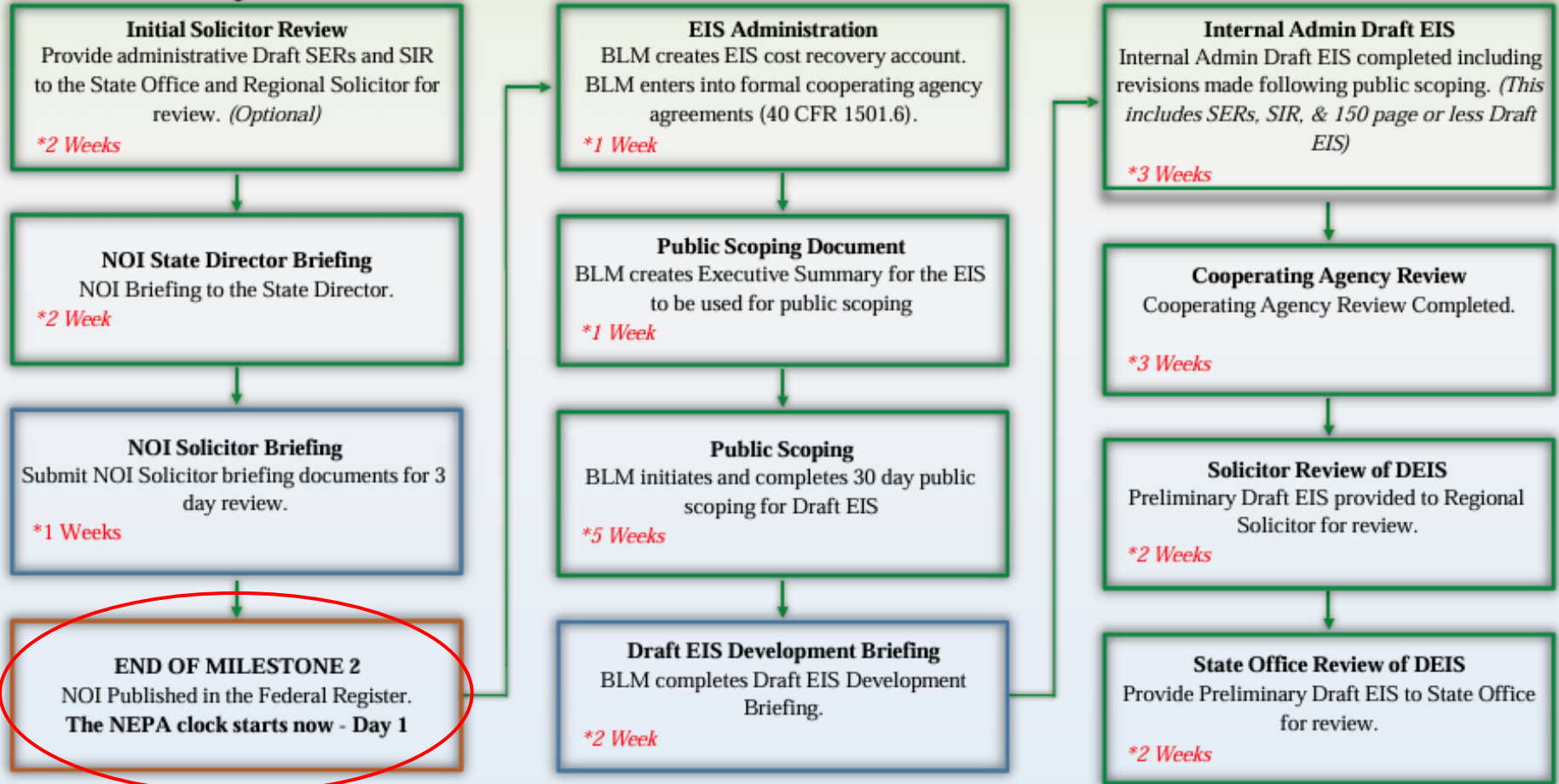


Key:
 *Red Text = Time needed for task
 — = Headquarters Briefing
 — = Project Milestone



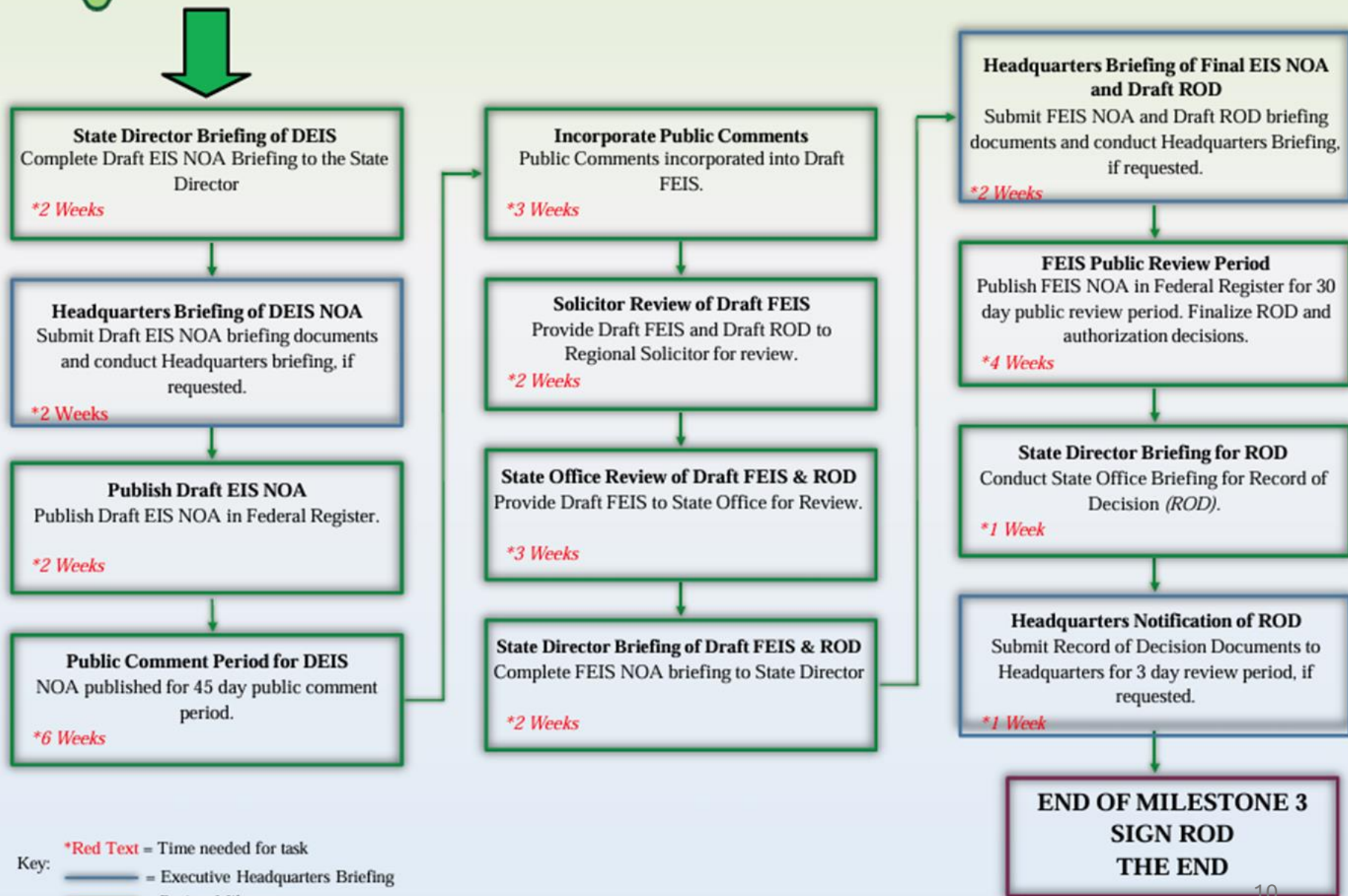
NEPA

- NEPA Clock starts
 - Environmental Impact Statement (EIS)
 - Notice of Intent (NOI) published in the Federal Register
 - Environmental Assessment (EA)
 - The date of notification
 - Notice of Intent (NOI) published in the Federal Register
 - Public Scoping
 - Determination of NEPA Adequacy (DNA), Categorical Exclusion (CE)
 - No "NEPA Clock" - Signature/Published Date
- Draft and Final Document development, Public Scoping, Cooperating Agency Review, Public Comment periods, Draft ROD



Key:
 *Red Text = Time needed for task
 — = Headquarters Briefing
 — = Project Milestone

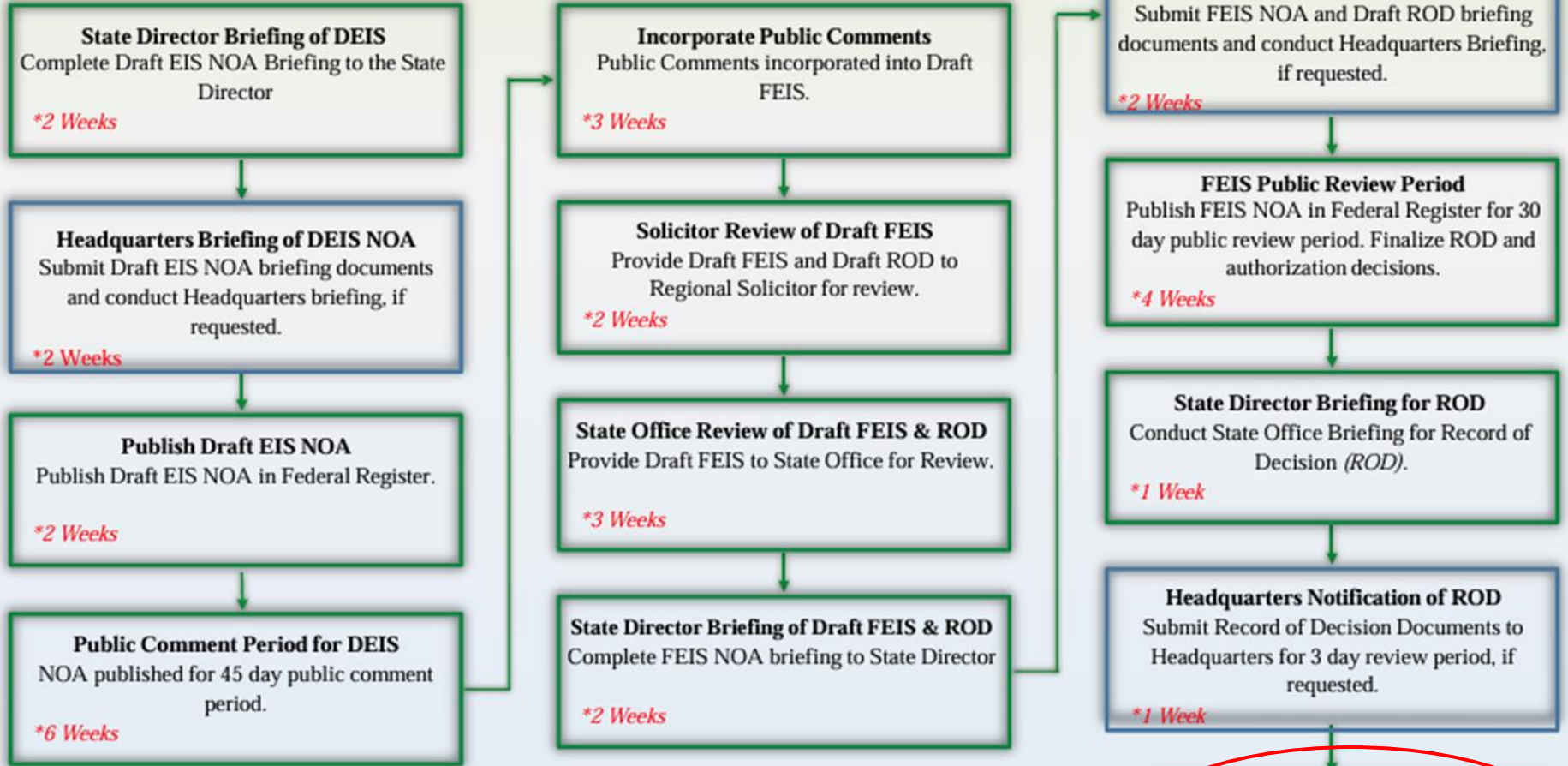






End of NEPA

- NEPA Clock ends
 - EIS
 - Record of Decision (ROD) signed and published in the Federal Register
 - EA
 - Published Final EA
 - Decision Record (DR)
 - Finding of No Significant Impact (FONSI)
 - DNA, CE
 - No "NEPA Clock" - Signature/Published Date



Key: *Red Text = Time needed for task
 — = Executive Headquarters Briefing
 — = Project Milestone



When a debit project enters the CCS

- Start of NEPA clock
 - Notification of the Public
 - NOI published
- Submitted CCS Debit Review Form I



When a debit project is a competing land use

- What is competing land use?
 - When a Debit Project counts as colocation for future Debit Projects
 - Ensures that landscape disturbance is not being mitigated for multiple times in one location
- Competing Land Use Status is also when current credits in the system may be invalidated by a debit project
- Manual (Appendix A, page 102)
 - Debit Project: An anthropogenic disturbance that creates a debit. A debit project qualifies as competing land use when the debit project signs and submits the Debit Review Form to the SETT with proof of the start of NEPA (finding of notice of intent for EIS or public notice initiating public comment for an EA) or state equivalent on state-owned land.



Version Control

- A CCS Project is committed to a HQT Version when the SETT has completed a Final Quality Assessment (QA).
- Manual (2.1.5 Version, page 31)
 - Debit calculations and mitigation provisions for a debit project must be based on the current version(s) of the CCS Manual and HQT. Specifically, the QA must be final and completed and a letter signed by the Administrator using a) the most recent version of the CCS Manual and HQT posted on the CCS website on the date of submittal, or b) the previous version of the CCS Manual and HQT if the current version of the CCS Manual and HQT was posted less than 90 days prior to the date of the signed QA. In addition, the same version of the CCS Manual and HQT must be used by the project. While an estimate can be issued prior, a submission will not be considered “final”, and a formal QA letter will not be issued until the Debit Project comment period for the Final EA or EIS or state equivalent on state-owned lands ends.



Completed Final QA

- After the SETT receives a "final submission", the Final Quality Assessment (QA) will be conducted
- Contents of a final Submission
 - Project shapefile used in Final EIS or EA document or the signing of a DNA or CE
 - Project Assessment Submission Form
 - HQT calculator and applicable field data
- Manual (Section 3.2, page 88)
 - While an estimate can be issued prior, a submission will not be considered final and a formal QA letter will not be issued until the comment period for the Final EA or EIS ends. Once the QA letter has been issued, the debits and version used is locked in and a transaction can occur. Should the QA process not be signed and a letter issued before 90-days after a new version is released, the project must be updated to the new version.



Summary

- Debit Project becomes a CCS project
 - Public notification and submitted Debit Review Form I
- Debit Project becomes a Competing Land Use
 - Public notice
 - Start of NEPA clock
- Debit Project is committed to a HQT Version
 - Debits are finalized during the final comment period
 - End of the NEPA clock



Options

- Four options
- Discussed with Technical Review Group/Science Working Group
 - BLM
 - UFWS
 - USFS
 - NDOW
 - Other partners
- Benefits and Limitations of each option



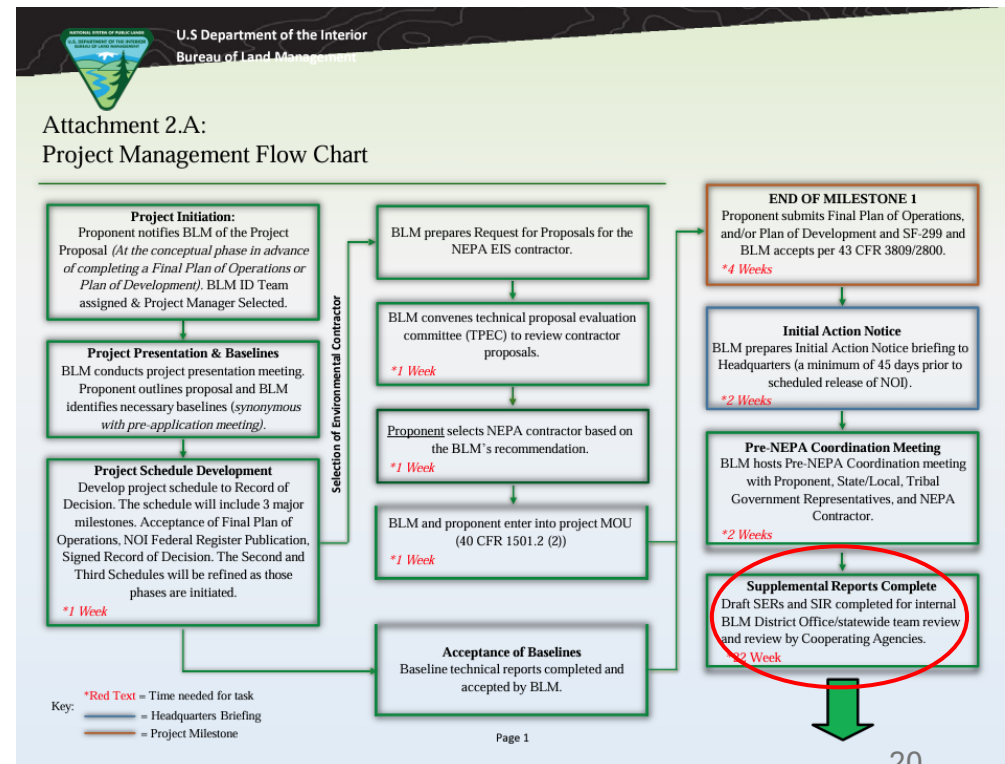
Option 1 – Current Policy

- No change to the current policy and procedure, as previously outlined
- **Benefits**
 - Known and accepted by all project proponents, verifiers, federal partners and state agencies, and current and past SETT staff and SEC members
 - Current NEPA process well documented and followed
 - Reduces number of HQT resubmissions, saving proponent time and money
- **Limitations**
 - Subject to change if the NEPA process is altered at the federal level
 - Does not align with all federal agencies Land Use Version Control and review deadlines



Option 2

- Debits becomes a Competing Land Use and the HQT version is committed at the submission of the Supplemental Reports .
- Supplemental Reports Optional
 - Standard Environmental Reference (SER)
 - Supplemental Information Report (SIR)
- Utilized for page restrictions and additional impact information





Option 2

- **Benefits**

- A potential standard point for entering the CCS and committing to a HQT Version and Competing Land Use
 - Does not change with other NEPA deadlines

- **Limitations**

- Not all Debit Projects have SERs
 - SETT would have to develop a new policy & procedure for projects with out SERs
- No formal deadline for NEPA SER submission
- Can be years between SERs and finalizing NEPA
 - If a Competing Land Use project is paused or canceled, then other Debit Projects are not mitigating their entire obligation requirement
- SETT would not be a Cooperating Agency until after SERs submitted
- Debit Project footprints are subject to change through the federal permitting process, causing CCS Competing Land Use conflicts
- Increases HQT Version and Competing Land Use tracking rigor on the SETT
- Does not align with any federal agencies Land Use Version Control and review deadlines



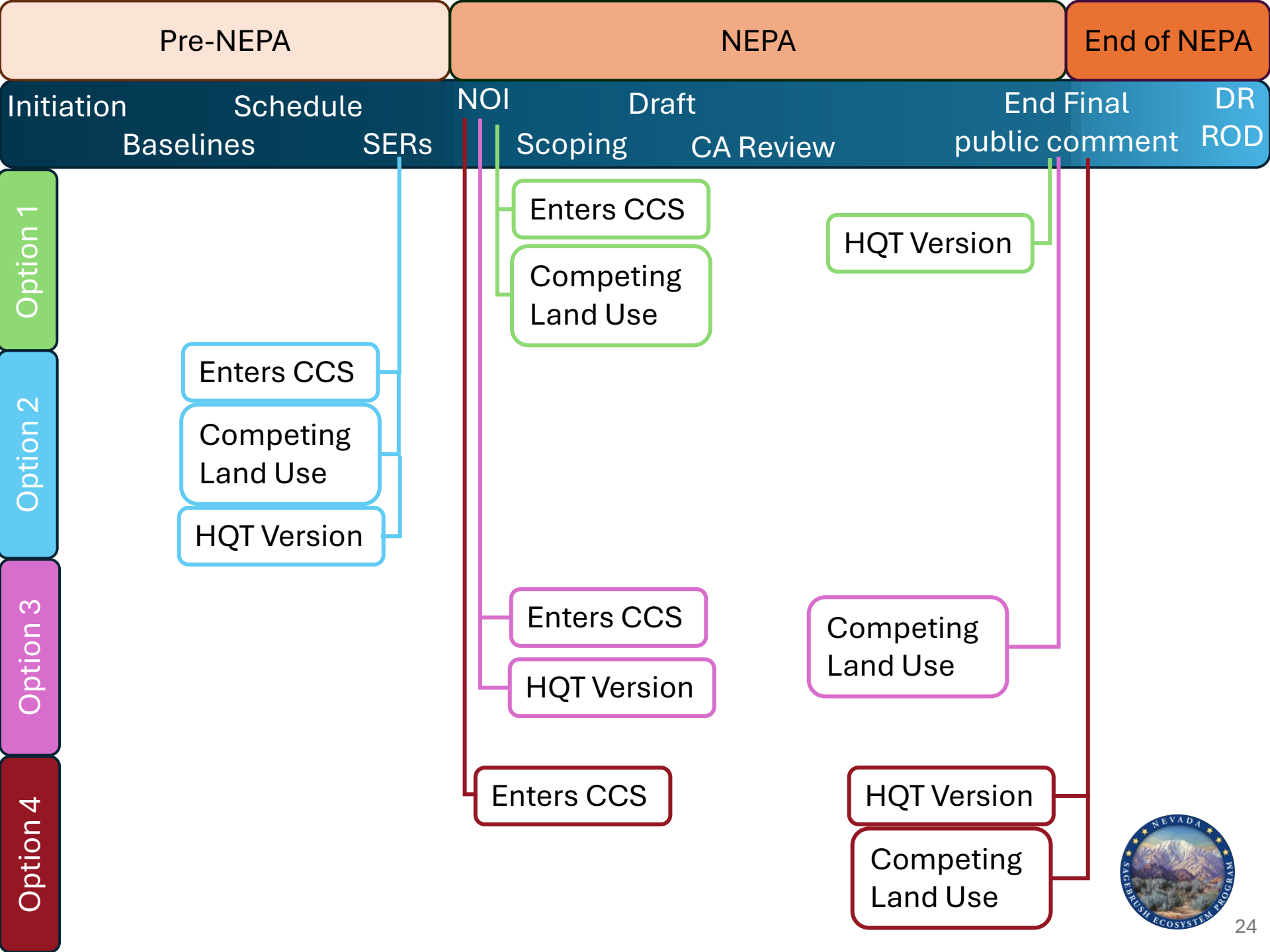
Option 3

- Debit Project committed to a HQT version at the Public notice (start of the NEPA clock).
- Debit projects will become a competing land use, and debits will be finalized when the final comment period takes place (end of NEPA Clock).
- **Benefits**
 - Consistent with the BLM
 - Land Use Plan version
 - Cumulative Impacts Assessment
 - Consistent with Competing Land Use and the USFWS final Review
 - Accurate representation of project footprints for Competing Land Use
- **Limitations**
 - Inverse of current policy and procedure
 - Initial confusion for current Competing Land Use decisions and additional workload
 - Increases HQT Version and Competing Land Use tracking rigor on the SETT



Option 4

- Debit Project becomes a CCS project when the public notification occurs and a submitted Debit Review Form I.
- Debit Project committed to a HQT version, will become a competing land use, and debits will be finalized when the final comment period takes place (end of NEPA Clock).
- **Benefits**
 - Accurate representation of project footprints for Competing Land Use
 - Reduce confusion due to finalization occurring at the end.
 - To reduce staff workload due to limited capacity at the SETT
 - Less versions to keep track of
 - Consistent with the BLM
 - Land Use Plan version
 - Cumulative Impacts Assessment
 - Consistent with Competing Land Use and the USFWS final Review
- **Limitations**
 - Inverse of current policy and procedure
 - Initial confusion for current Competing Land Use decisions and additional workload





Next Steps

- CCS document updates
 - Manual Version 1.9
 - User's Guide 1.9



Questions?

