

Proposed Additions for CCS Public Lands Credit Projects

Sagebrush Ecosystem Council Meeting
June 3, 2025

Presented by
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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.**

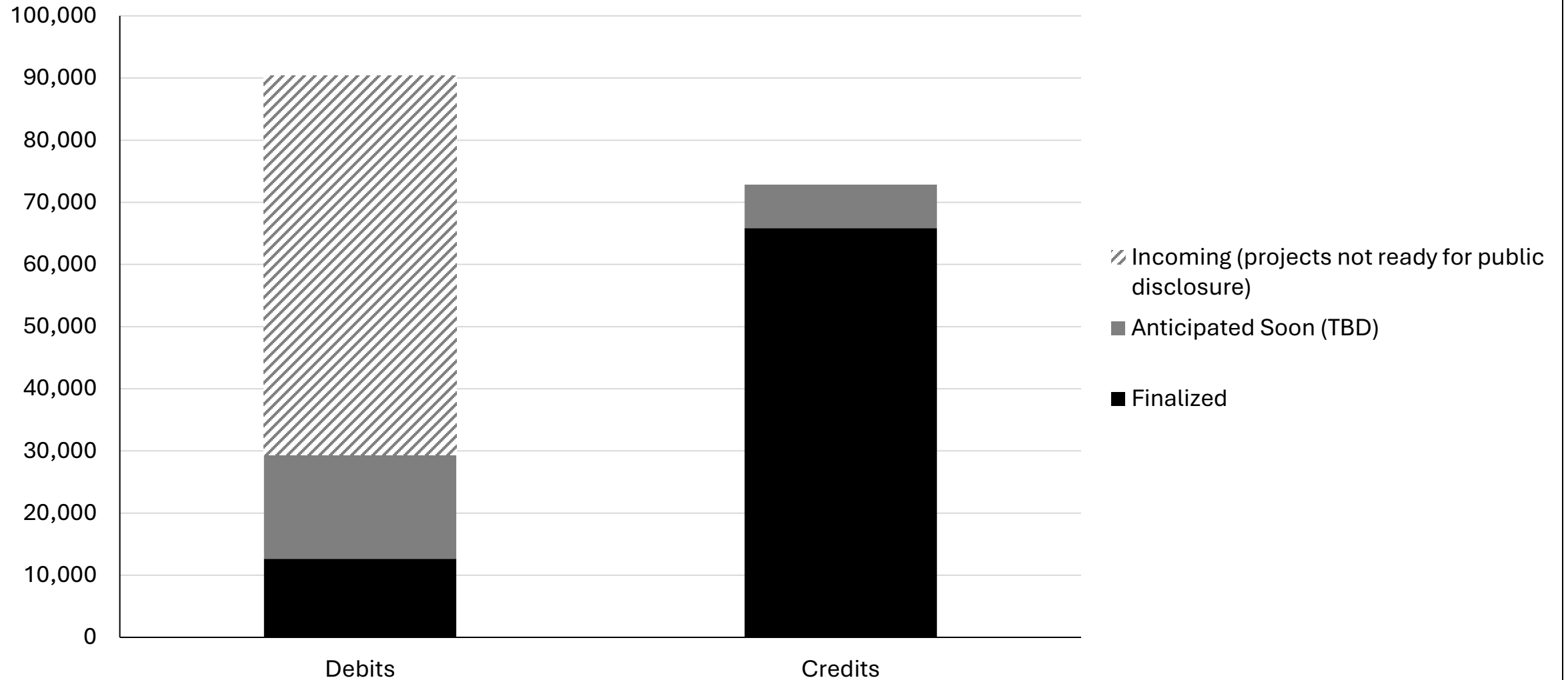
2019 NV GRSG Conservation Plan

- The specific duties of the SEC include:
 - Solicit suggestions and information and, if necessary, **prioritize projects concerning the enhancement of the landscape, the restoration of habitat, the reduction of nonnative plants** and the mitigation of damage to, or the expansion of, scientific knowledge of sagebrush ecosystems
 - **Establish policies for the identification and prioritization of landscape-scale enhancement, restoration, fuel reduction, and mitigation projects** based upon ecological site potential, state and transition models, and other data that will contribute to decision making informed by science to increase resiliency

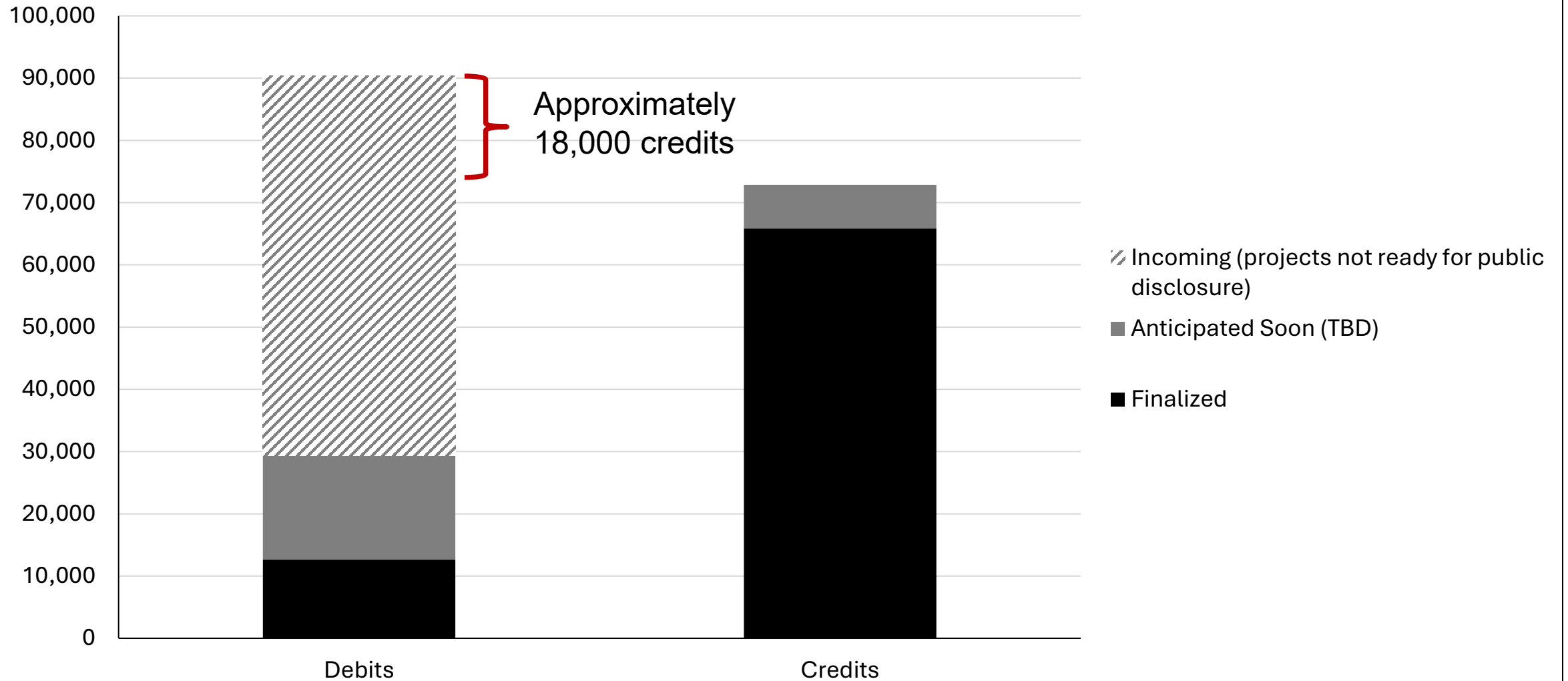
2019 NV GRSG Conservation Plan

- The specific duties of the SETT include:
 - **Identify and prioritize landscape-scale enhancement, restoration, fuel reduction, and mitigation projects** based upon ecological site potential, state and transition models, and other data that will contribute to decision making informed by science to increase resiliency following wildfire

Debit and Credit Balances



Debit and Credit Balances



Current SEC Approved Public Lands Credit 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 or monitoring

Current Public Lands Credit Project 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 and Reserve Account contributions are required
- Signed Participant Contract and Mitigation Plan
- The first one-third (1/3) of the total debit 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

- 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

Phase	Factor Value
Phase I (1 - 10% cover)	1.2
Phase II (> 10% cover)	1.5



Phase	Factor Value
Phase I (1 - 10% cover)	1.2
Phase II & III (> 10% cover)	1.5

CCS Manual v2.0 page 43

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

New Project Types:

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2. Post-fire or Weed Control Restoration

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Post-fire or Weed Control Restoration

- Direct Objectives
 - Reduce the abundance and spread of invasive and noxious annual grasses and other weeds
 - Increase the abundance and diversity of native forbs and grasses
 - Increase sagebrush cover
- Resulting Outcomes
 - Increased sagebrush ecosystem health and resiliency
 - Reduced fire risk and increase probability of fire recovery
 - Increased the quality and quantity of habitat for the greater sage-grouse and other native wildlife
- 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%
 - 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, except 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

Reserve Account

- All Credit Projects (Private and Public) have a 4% base contribution to a Reserve Account
 - Remaining contributions are determined by
 - Resistance and resilience following wildfire and ability to control wildfire, 1 - 6%
 - Probability of completing land uses, 0 - 4%
- Current Reserve Account Breakdown
 - Private Lands Credit Projects average \approx 11% (range from 5 – 14%)
 - Public Lands Credit Projects
 - Base contribution, a maximum score for the probability of adverse impacts from wildfire, maximum competing land use score (due to the multiple use mandate on public lands), and an additional 11% contribution due to a reduced ability to protect credit sites = 25% flat rate
 - 3-times the calculated amount for Anthropogenic Disturbance Removal
 - Because there is no required maintenance or monitoring

Reserve Account

- Example: If 1,500 credits are generated then a Private Credit Project could not sell 165 of those credits (11% of the total credits), leaving 1,335 sellable credits
- Example: If 1,500 debits are needed for a Post-fire or Weed Control Public Lands Credit Project, 375 additional credits must be generated (25% of the total debits), totaling 1,875 credits required for offset
 - 210 more reserve credits than a Private Credit Project

Reserve Account

- Example: If 10,500 credits are generated then a Private Credit Project could not sell 1,155 of those credits (11% of the total credits), leaving 9,345 sellable credits
- Example: If 10,500 debits are needed for a Post-fire or Weed Control Public Lands Credit Project, 2,625 additional credits must be generated (25% of the total debits), totaling 13,125 credits required for offset
 - 1,470 more reserve credits than a Private Credit Project

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

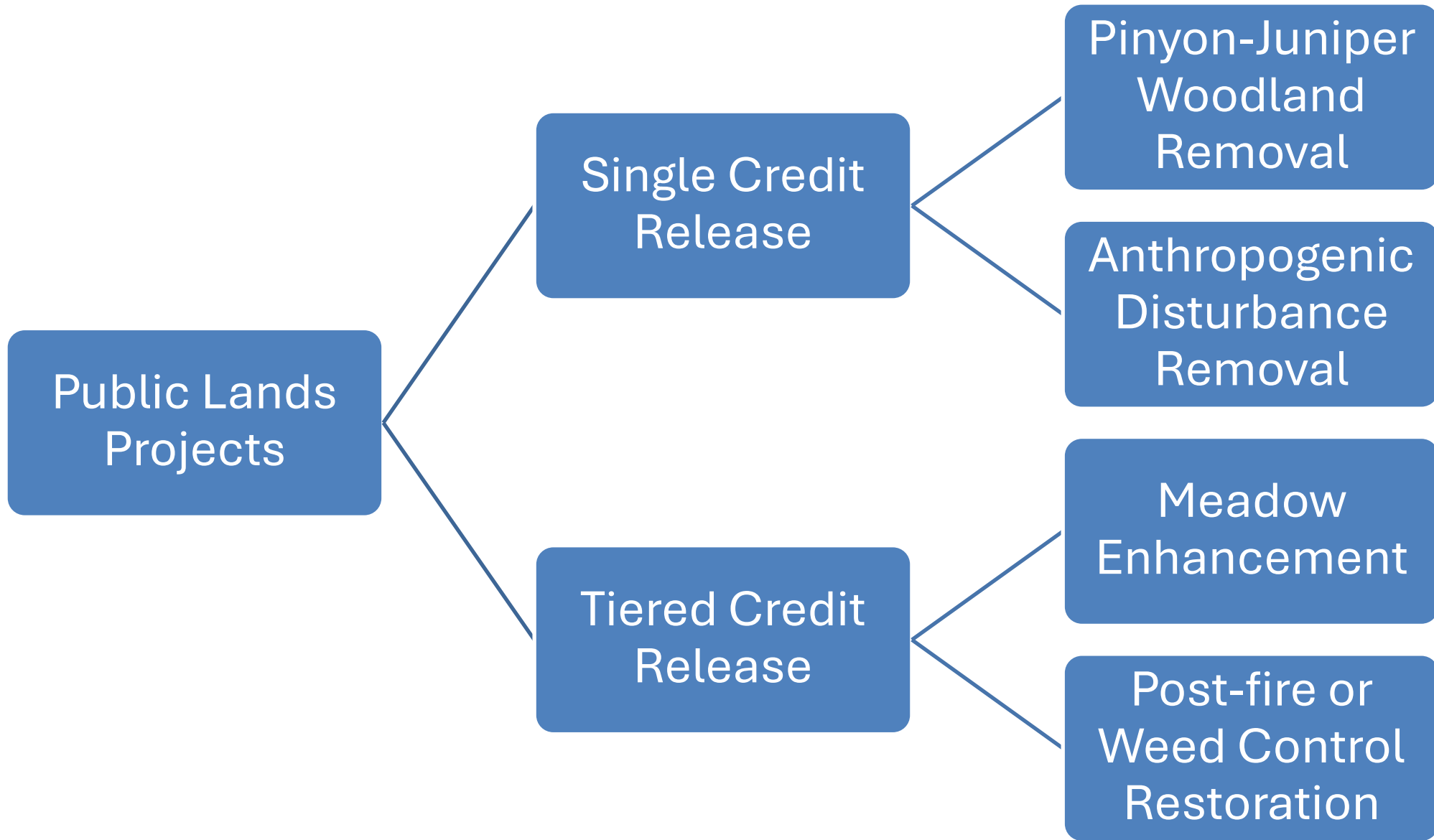
Policies for Discussion and Approval

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
- No pre- or post-treatment monitoring required
- Retreatment required for PJ Woodland Removal
- 3X Reserve Account contributions for Anthropogenic Disturbance Removal or 25% Reserve Account contributions
- Financial Assurances

Tiered Credit Release

- A hierarchical and categorical-based approach to credit releases for pre-determined restoration actions
- Applies to projects when treatments may require or benefit from a ranked or step-wise restoration approach
 - 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 a similar timeframe and result in a known number of credits
 - The grouping of treatments 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 ranked in order of restoration or enhancement priority
 - These decisions would be made by SETT in collaborations with all applicable landowners, land managers, and land users

How is a tier determined?

1. Like all CCS Projects, the project area is divided into ecologically distinct groups called Map Units
 - Ecological Site Descriptions and Disturbance Response Groups
 - Promotes the groupings of regions with similar treatment needs and regions with a similar treatment response
2. Ecologically similar areas may be divided into multiple Map Units to increase treatment feasibility

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	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU 1							460	2000	1.15
	2	MU 2	MU 1								
Tier 2	3	MU 3	MU 2			MU 1			460		
	4	MU 4	MU 3			MU 2	MU 1				
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1	460		
	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	460		
	8		MU 7			MU 6	MU 5	MU 4			
Tier 5	9					MU 7	MU 6	MU 5	160		
	10						MU 7	MU 1 -7			
									SUM	2000	

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

Most Degraded Areas



Least Degraded Areas

Credit Release Tier	Year (Project Term Length)	Weed Spraying	Seeding	Fencing	PJ Removal	Retreatment and/or Monitoring	Annual Monitoring	5-yr Monitoring	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU 1							460	2000	1.15
	2	MU 2	MU 1								
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	4	MU 4	MU 3			MU 2	MU 1				
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1	460		
	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	460		
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	2	MU 2	MU 1								
Tier2	3	MU 3	MU 2			MU 1			460		
	4	MU 4	MU 3			MU 2	MU 1				
Tier3	5	MU 5	MU 4			MU 3	MU 2	MU 1	460		
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2			
Tier4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3	460		
	8		MU 7			MU 6	MU 5	MU 4			
Tier5	9					MU 7	MU 6	MU 5	160		
	10						MU 7	MU 1 -7			
									SUM	2000	

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	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU 1							460	2000	1.15
	2	MU 2	MU 1								
Tier 2	3	MU 3	MU 2			MU 1			460		
	4	MU 4	MU 3			MU 2	MU 1				
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1	460		
	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	460		
	8		MU 7			MU 6	MU 5	MU 4			
Tier 5	9					MU 7	MU 6	MU 5	160		
	10						MU 7	MU 1 -7			
									SUM	2000	

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	Credits Release	Total Credit Obligation	Treatment Weight
Tier1	1	MU 1							460	2000	1.15
	2	MU 2	MU 1								
Tier2	3	MU 3	MU 2			MU 1			460		
	4	MU 4	MU 3			MU 2	MU 1				
Tier3	5	MU 5	MU 4			MU 3	MU 2	MU 1	460		
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2			
Tier4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3	460		
	8		MU 7			MU 6	MU 5	MU 4			
Tier5	9					MU 7	MU 6	MU 5	160		
	10						MU 7	MU 1 -7			
									SUM	2000	

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	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU 1							460	2000	1.15
	2	MU 2	MU 1								
Tier 2	3	MU 3	MU 2			MU 1			460		
	4	MU 4	MU 3			MU 2	MU 1				
Tier 3	5	MU 5	MU 4			MU 3	MU 2	MU 1	460		
	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	460		
	8		MU 7			MU 6	MU 5	MU 4			
Tier 5	9					MU 7	MU 6	MU 5	160		
	10						MU 7	MU 1 -7			
									SUM	2000	

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	Credits Release	Total Credit Obligation	Treatment Weight
Tier1	1	MU 1							460	2000	1.15
	2	MU 2	MU 1								
Tier2	3	MU 3	MU 2			MU 1			460		
	4	MU 4	MU 3			MU 2	MU 1				
Tier3	5	MU 5	MU 4			MU 3	MU 2	MU 1	460		
	6	MU 6	MU 5		MU 6	MU 4	MU 3	MU 2			
Tier4	7	MU 7	MU 6	MU 7		MU 5	MU 4	MU 3	460		
	8		MU 7			MU 6	MU 5	MU 4			
Tier5	9					MU 7	MU 6	MU 5	160		
	10						MU 7	MU 1 -7			
									SUM	2000	

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	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU1	MU2	MU2	MU3				86	300	1.15
	2		MU1			MU2; 3					
Tier 2	3					MU1	MU2; 3		71		
	4						MU1; 2				
Tier 3	5							MU2; 3	71		
	6							MU1			
Tier 4	7								0		
	8										
Tier 5	9								72		
	10							MU1; 2; 3			
								SUM	300		

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	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU1	MU2	MU2	MU3				86	300	1.15
	2		MU1			MU2; 3					
Tier 2	3					MU1	MU2; 3		71		
	4						MU1; 2				
Tier 3	5							MU2; 3	71		
	6							MU1			
Tier 4	7								0		
	8										
Tier 5	9								72		
	10							MU1; 2; 3			
								SUM	300		

Credit Release #1


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	Credits Release	Total Credit Obligation	Treatment Weight
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	6							MU1			
Tier 4	7								0		
	8										
Tier 5	9								72		
	10							MU1; 2; 3			
								SUM	300		

Credit Release #2


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	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU1	MU2	MU2	MU3				86	300	1.15
	2		MU1			MU2; 3					
Tier 2	3					MU1	MU2; 3		71		
	4						MU1; 2				
Tier 3	5							MU2; 3	71		
	6							MU1			
Tier 4	7								0		
	8										
Tier 5	9								72		
	10							MU1; 2; 3			
								SUM	300		

Credit Release #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	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU1	MU2	MU2	MU3				86	300	1.15
	2		MU1			MU2; 3					
Tier 2	3					MU1	MU2; 3		71		
	4						MU1; 2				
Tier 3	5							MU2; 3	71		
	6							MU1			
Tier 4	7								0		
	8										
Tier 5	9								72		
	10							MU1; 2; 3			
								SUM	300		

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	Credits Release	Total Credit Obligation	Treatment Weight
Tier 1	1	MU1	MU2	MU2	MU3				86	300	1.15
	2		MU1			MU2; 3					
Tier 2	3					MU1	MU2; 3		71		
	4						MU1; 2				
Tier 3	5							MU2; 3	71		
	6							MU1			
Tier 4	7								0		
	8										
Tier 5	9								72		
	10							MU1; 2; 3			
									SUM	300	

Credit Release #4



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

Project Development

- Once a preliminary debit estimate is reached, potential Public Lands Credit Project scouting can occur
 - The Debit Proponent or SETT may present potential projects to each other—this would be an iterative process
 - SETT would only present potential project that would fulfill the debit obligation (after the 1/3 minimum private purchase)
 - SETT would be responsible for determining if a Proponent submitted project would fulfill the debit obligation (after the 1/3 minimum private purchase)

Project Development

- Project scouting will be in collaboration with federal and state agencies to finding previously permitted restoration project areas or unpermitted areas in need
 1. Regional offices are the first stop to find a Public Lands Credit Project within proximity of the Debit Project
 2. If there are no applicable regions, we will expand our search

Mitigation 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
 - Budget

Mitigation Plan

- Similar to Private Credit Project Management Plans except
 - Additional information regarding
 - Land use permitting
 - Treatment timeline
 - Credit release schedule
 - Additional details regarding
 - Treatment actions
 - Treatment budget for financial assurances

Monitoring Procedures

- SETT would provide sampling locations per treatment area for monitoring
- 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, Sparse, 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

- Same as the Private Credit Project Monitoring Reports
- Documentation of
 - All treatment actions
 - Monitoring outputs
 - Photos
 - Qualitative Questionnaire
 - Financial Assurances updates
 - Biological Observations

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
 - These requirements will be outlined in a few slides

Current CCS Durability Mechanisms

- Credit Project durability provisions to ensure all Credit Projects are producing expected outcomes for their entire duration
- Durability provisions include legal, financial, and CCS management mechanisms
 - Participant Contract
 - Management or Mitigation Plan
 - Project Monitoring
 - Reserve Account Contributions
 - Financial Assurances
 - Debit Impact Assurances

Durability: Participant Contract

- All Credit Project Proponent are required to have a signed Participant Contract which is the legal agreement between the Proponents and the Administrator that defines the obligations of the Credit Proponents, such as
 - Financial Assurances
 - Management actions defined in a Management or Mitigation Plan
 - Other relevant terms and conditions for the development of credits under the CCS
- Increases Project and CCS legal protections

Durability: Management or Mitigation Plan

- All Credit Project Proponent are required to have signed a Management (private projects) or Mitigation (public projects) Plan that assigns and outlines responsibilities for
 - Management/Treatments
 - Monitoring (annual and 5-year)
 - Reporting (annual and 5-year)
 - Other relevant terms and conditions for the development of credits under the CCS
- Increases Project and CCS protections with clearly outlined roles and responsibilities of all parties and that the required actions are occurring

Durability: Project Monitoring and Reporting

- Private Credit Projects are required to complete monitoring and reporting for the duration/term of the purchased credits which are required to match the duration/term of the offset debits
 - A 50yr term debit can not be offset by a 30yr term credit, they must match in term
- **ACTION ITEM:** Public Lands Credit Projects with tiered credit release schedule are required to monitor and report for the duration of the project term that it is offsetting


Durability: Reserve Account Contributions

- All Credit Projects (Private and Public) have a 4% base contribution of the credits calculated to a Reserve Account
 - Remaining contributions are determined by
 - Resistance and resilience following wildfire and ability to control wildfire, 1 - 6%
 - Probability of completing land uses, 0 - 4%
 - Backup credits to restore project conditions in the event of force majeure
- 25% Reserve Account Contribution rate
 - Since a public Proponent has less authority over public lands compared to private Proponent, beyond the maximum Private Project contribution (14%) will be required


Durability: Financial Assurances

- Required 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

Durability: Financial Assurances

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

Financial Assurances for Tier 2 required


Durability: Financial Assurances

- Increases Project and CCS protections by
 - Ensuring the Proponent has the financial means to complete the project
 - Ensuring the money is available to the CCS if the Proponent stops completing treatments or monitoring

Durability: Debit Impact via Competing Land Uses

- The invalidation of Public Lands Credits due to a new anthropogenic disturbance
- The newly proposed Debit Project would be responsible to offset all invalidated credits of the Public Land Project
 - 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 happens if a proposed Debit Project has direct or indirect impacts on the Public Lands Credit Project when those credits have 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 happens 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 proposed Debit Project completes its 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:

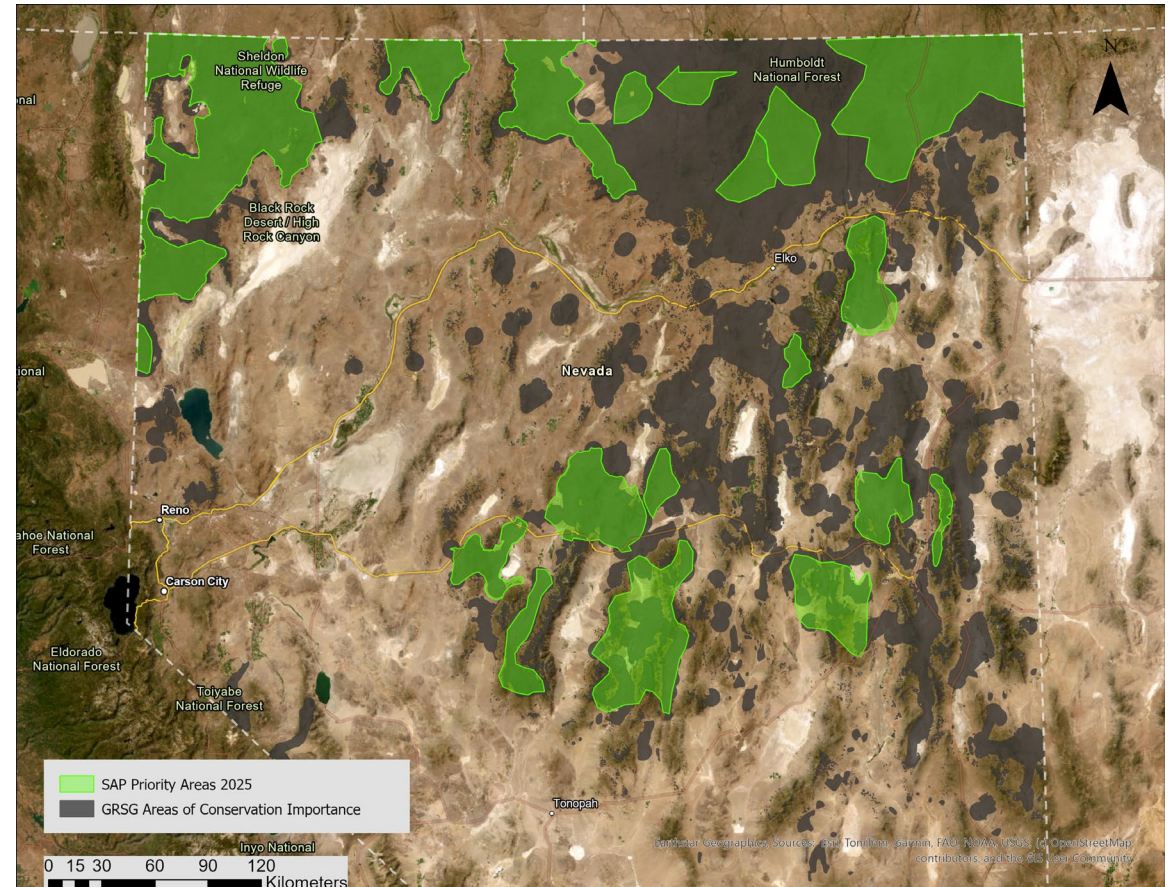
- Most effective restoration practices require year-to-year effort making them innately ‘phased’
- Public Land Projects are subject to a greater number of limitations outside of the Proponents control which may cause project delays
 - Seasonal/weather conditions
 - Wildlife disturbance restrictions (e.g., 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 Strategic Action Plan (SAP) Priority Areas, it would be exempt from a proximity factor
 - Projects entirely or mostly outside of the SAP Priority Areas, it would not be exempt from a proximity factor



Proximity Factor

- If Public Lands Projects can not be found or developed within proximity of the debit site, then a project would defer to the Strategic Action Plan (SAP) Priority Areas
- Justification
 - The SAP Priority Areas would then be prioritized if local work is not available, offering a more targeted approach for scouting project areas
 - SAP Priority Areas have been determined by us and our collaborators as highly important area for GRSG and can be updated with the SAP

Summary and Discussion

We propose, if localized work is not possible, then Public Lands Credit Projects be exempt from Proximity Factors if the Project Area is largely within the Strategic Action Plan designated Priority Areas.