

Nevada

Sagebrush Ecosystem Program

Conservation Credit System Debit
Project Renewal and Reclamation
Working Group

August 17th, 2026

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NEVADA
**SAGEBRUSH ECOSYSTEM
PROGRAM**



Nevada Department of
**CONSERVATION &
NATURAL RESOURCES**



Nevada
Department
of Agriculture



Debit Project Duration

- Length of time that the project is anticipated to impact GRSB habitat function
- Mineral Exploration Project Term
 - 10 years + (in increments of 5 years)
- Non-Exploration Project Term
 - 30 years + (in increments of 5 years)
 - The final 10 years are for reclamation
 - EX: 20 years for operation, 10 years for reclamation = 30-year CCS term
 - In perpetuity (120+ years)
 - No renewal or reclamation requirement

Debit Project Renewal

- A project has reached the end of this operational term and is choosing to continue operations and not reclaim the project area
- Renewal of the original NEPA authorization is submitted to the Federal Agency
- The original number of term debits will be applied again
 - The determined debit obligation must be fully offset within one year of the renewal approval
 - EX: Debit Project mitigated 100 debits in 2020, in 2050 the project renews and must offset 100 debits

Debit Project Renewal

- Standard credit obligation requirements would apply to the renewed project
 - Proximity factors
 - 1/3 private credit project purchase with a public lands credit project
- Proposed changes to the standard credit obligation requirements
 - Credit purchases can not be phased, or purchased in multiple transactions through time
 - Debits must be offset within one year of renewal approval

Debit Project Renewal

- Limitations
 - Project footprint modifications from the original NEPA and CCS evaluation
 - Additional disturbance area
 - Change in the CCS anthropogenic feature type or subtype
 - EX: Powerline upgrade from non-nest facilitating to nest facilitating (25% to 75% weight difference)
 - The project would be rerun in the original project version for an updated debit amount
- Challenges
 - Communication between SETT, BLM, USFS, and Proponents

Debit Project Reclamation

- A project has reached the end of its operational term, is choosing to close operations, and the 10-year CCS reclamation term starts
- Only direct map units have required reclamation



Debit Project Reclamation

- Current Guidelines:
 - CCS Manual v1.1 – v2.1 (§ 2.5.4 Debit Project Duration)
 1. Pre-project conditions must be met for non-perpetuity project durations
 2. Third-party verification is required to demonstrate that the GRSG habitat has returned to pre-project function
 3. If not yet fully rehabilitated, the Administrator (SETT) will require additional credits sufficient to cover the residual impact be purchased for an additional term

Debit Project Reclamation: Goals

1. Pre-project conditions must be met for non-perpetuity project durations
 1. Ensure reclamation field standards are meeting pre-project conditions while being realistic
 2. Ensure CCS requirements align with Federal and other State Entities
2. Third-party verification is required to demonstrate that the GRSG habitat has returned to pre-project function
3. If not yet fully rehabilitated, the Administrator (SETT) will require the purchase of additional credits sufficient to cover the residual impact for an additional term (minimum 10 years)

Reclamation Requirements

Conservation
Credit System
Requirements

Federal and
Other State
(NDEP) Entity
Requirements

Reclamation Requirements

Conservation
Credit System
Requirements



Pre-Project Conditions:

1) Sagebrush Canopy Cover, 2) Total Shrub Cover, 3) Perennial Forb Cover, 4) Forb Species Richness, 5) Perennial Grass Cover, 6) Invasive Annual Grass Cover

Federal and
Other State
(NDEP) Entity
Requirements



“...the surface shall be stabilized by vegetation or other means as soon as practical to reduce further soil erosion from wind or water, provide forage and cover, and reduce visual impacts...” DOI BLM Solid Minerals Reclamation Handbook §1.D.7

Determining Pre-project Site Conditions

Each Vegetation Metric of a Direct Map Unit averaged

1. Sagebrush Canopy Cover
2. Sagebrush Count
3. Total Shrub Cover
4. Perennial Forb Cover
5. Forb Species Richness
6. Perennial Grass Cover
7. Invasive Annual Grass Cover



Determining Reclamation Standards

- Two Categories:
 - Cleared GRSG Habitat
 - Mowed or Crushed GRSG Habitat
- Percent of original (i.e., pre-project) baseline habitat scores
- Standards for years 1, 5, and 10 of reclamation
- Latest best available data (e.g., Rangeland Analysis Platform; Assessment, Inventory, and Monitoring Data) will determine pre-project conditions for 100% HSI projects

Percent of original baseline habitat scores expected to be present in each year of reclamation by habitat disturbance type.

Years After Implementation ²	Cleared GRSG Habitat	Mowed or Crushed GRSG Habitat
Start of reclamation	0% of all vegetation communities	0% of all vegetation communities
1 year	Sagebrush ¹ 1% pre-project cover 75% pre-project count Shrub 5% pre-project cover Perennial Forb ¹ 75% pre-project meadow cover 20% pre-project upland cover ≥ pre-project richness Perennial Grass 75% pre-project meadow cover 20% pre-project upland cover Invasive Annual Grass ≤ pre-project cover	Sagebrush ¹ 7% pre-project cover 100% pre-project count Shrub 20% of pre-project cover Perennial Forb ¹ 100% pre-project cover ≥ pre-project richness Perennial Grass 100% pre-project cover Invasive Annual Grass ≤ pre-project cover
5 years	Sagebrush ¹ 5% pre-project cover 75% pre-project count Shrub 25% pre-project cover Perennial Forb ¹ 100% pre-project cover ≥ pre-project richness Perennial Grass 100% pre-project cover Invasive Annual Grass ≤ pre-project cover	Sagebrush ¹ 33% pre-project cover 100% pre-project count Shrub 100% pre-project cover Perennial Forb ¹ 100% pre-project cover ≥ pre-project richness Perennial Grass 100% pre-project cover Invasive Annual Grass ≤ pre-project cover
10 years (end of CCS reclamation term)	Sagebrush ¹ 10% pre-project cover 100% pre-project count Shrub 100% pre-project cover Perennial Forb ¹ 100% pre-project cover ≥ pre-project richness Perennial Grass 100% pre-project cover Invasive Annual Grass ≤ pre-project cover	Sagebrush ¹ 67% pre-project cover 100% pre-project count Shrub 100% pre-project cover Perennial Forb ¹ 100% pre-project cover ≥ pre-project richness Perennial Grass 100% pre-project cover Invasive Annual Grass ≤ pre-project cover

¹ For a map unit to achieve standards, only one of the two metrics must be met.

² Standards for years one and five are recommended standards to help evaluate success through time.



Percent of original baseline habitat scores expected to be present in each year of reclamation by habitat disturbance type.

Years After Implementation ²	Cleared GRSG Habitat	Mowed or Crushed GRSG Habitat
Start of reclamation	0% of all vegetation communities	0% of all vegetation communities
1 year	Sagebrush¹ 1% pre-project cover 75% pre-project count Shrub 5% pre-project cover Perennial Forb¹ 75% pre-project meadow cover 20% pre-project upland cover ≥ pre-project richness Perennial Grass 75% pre-project meadow cover 20% pre-project upland cover Invasive Annual Grass ≤ pre-project cover	Sagebrush¹ 7% pre-project cover 100% pre-project count Shrub 20% of pre-project cover Perennial Forb¹ 100% pre-project cover ≥ pre-project richness Perennial Grass 100% pre-project cover Invasive Annual Grass ≤ pre-project cover
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Percent of original baseline habitat scores expected to be present in each year of reclamation by habitat disturbance type.

Years After Implementation ²	Cleared GRSB Habitat	Mowed or Crushed GRSB Habitat
10 years (end of CCS reclamation term)	Sagebrush¹ • 10% pre-project cover • 100% pre-project count Shrub • 100% pre-project cover Perennial Forb¹ • 100% pre-project cover • ≥ pre-project richness Perennial Grass • 100% pre-project cover Invasive Annual Grass • ≤ pre-project cover	Sagebrush¹ • 67% pre-project cover • 100% pre-project count Shrub • 100% pre-project cover Perennial Forb¹ • 100% pre-project cover • ≥ pre-project richness Perennial Grass • 100% pre-project cover Invasive Annual Grass • ≤ pre-project cover

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Debit Project Reclamation: Goals

1. Pre-project conditions must be met for non-perpetuity project durations
2. Third-party verification is required to demonstrate that the GRSG habitat has returned to pre-project function
 1. Discuss SETT completing the reclamation verification
3. If not yet fully rehabilitated, the Administrator (SETT) will require the purchase of additional credits sufficient to cover the residual impact for an additional term (minimum 10 years)

Reclamation Verification

- Debit Proponent would have two options:
 1. Hire a CCS Verifier for reclamation field verification, with SETT QA/QC and final determination (just like pre-project post-field)
 2. The SETT will complete the reclamation field verification with internal QA/QA and final determination, as capacity allows (similar to a SETT completed 100% HSI Desktop analysis)

Debit Project Reclamation: Goals

1. Pre-project conditions must be met for non-perpetuity project durations
2. Third-party verification is required to demonstrate that the GRSG habitat has returned to pre-project function
3. If not yet fully rehabilitated, the Administrator (SETT) will require the purchase of additional credits sufficient to cover the residual impact for an additional term (minimum 10 years)
 1. Discuss credit transaction timelines, phasing factors, and 10-year credit prorations
 2. Discuss projects changing to perpetuity durations

Reclamation Non-Compliance

- Reclamation verification and compliance evaluation will occur at final year of the reclamation term
 - Each project Map Unit will be individually evaluated
- If compliance for a Map Unit is not reached, the original number of debits generated by the Unit must be offset and reclamation continues for that Unit
- The purchase of credits for non-compliance must be completed within one year, and phasing purchases is not allowed
- The required credits would be prorated to offset the following 10-years of reclamation (all CCS Credits have a minimum term of 30 years)
 - EX: 30-year term Project with 105 reclamation debits, are required to purchase 35 10-year credits ($30\text{yr} / 10\text{yr} = 3$; $105\text{ 30-yr debits} / 3 = 35\text{ 10-year credits}$)

Thank You

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