

CCS Debit Project Renewal

The Conservation Credit System (CCS) project term (or lifespan) is the NEPA authorized duration of operation, plus 10 years for reclamation. Credits used to offset debits must match in project term (e.g., a 30-year debit project must purchase 30-year credits). Thus, if a Debit Project chooses to continue operations past the originally agreed-upon term, and submits a renewal request to their authorizing Federal Agency, then the CCS Debit Project must also renew their greater-sage grouse mitigation credits.

If the renewal **does not** include any modifications to the original NEPA, then the project would proceed as follows:

- 1) SETT will track project terms and reach out to the Debit Project Proponent and/or the Federal Agency to determine if a project plans to renew
- 2) If the renewing project qualifies (e.g., previously qualified as a CCS project), the SETT will issue a debit amount to the Proponent
- 3) Within one year of Federal Agency renewal approval, the entirety of the term debit obligation must be offset. The term of the project will restart upon renewal (NEPA term + 10 years, minimum of 30 years except for exploration).

Discussion Points:

- 1) What is the federal review process for renewals with and without modifications?
 - Modification with additional disturbance acreage or disturbance type change
- 2) How often are renewals requested for less than 10 years of additional operations?
- 3) How can SETT facilitate communication with our federal partners regarding renewals?

CCS Debit Project Reclamation

Project closure requires federal and state mandated reclamation. The CCS aims to rehabilitate disturbed acres of greater sage-grouse (GRSG) habitat to pre-project conditions in alignment with all other federal and state reclamation requirements. Conservation Credit System projects have a minimum 10-year reclamation term to rehabilitate GRSG habitat that was affected by the direct project impacts (permanent features excluded) to pre-project or better conditions. Pre-project conditions are determined during a debit project's initial debit quantification process, either through field-sampling of vegetation attributes (for those projects conducting field-verification), or through the best available data (for desktop-only, 100% Habitat Suitability Indices (HSI), projects; discussed in more detail below).

Only the direct-impact map units of a project are evaluated for reclamation satisfaction. Each map unit is evaluated independently because the distinct ecological areas will likely have varying pre-project conditions and responses. Within each map unit, pre-project vegetation data are averaged per specific metric (e.g., perennial grass cover, forb species richness, etc.). These averages will be the pre-project conditions against which reclamation results will be compared. For debit projects conducting field-verification during the initial debit quantification process, field transect data will be used for determining pre-project conditions. For debit projects conducting desktop-only, 100% HSI, analyses during the initial debit quantification process, the best available data (e.g., Rangeland Analysis Platform; Assessment, Inventory, and Monitoring Data) at the time of project enrollment will be used for determining pre-project conditions.

The standards for reaching CCS reclamation compliance are sub-divided into vegetation groups (e.g., sagebrush, invasive annual grass, etc.; Table 1) and vegetation disturbance categories of either "cleared habitat" or "mowed or crushed habitat". Any anthropogenic disturbances or features that removed all vegetation can be classified as "cleared habitat". Such features or actions may include the construction of a gravel pit or ancillary mining infrastructure. Any anthropogenic disturbances or features that have not removed all vegetation, where some native vegetation remains on the landscape, can be classified as "mowed or crushed habitat". This may include routinely mowed or driven rights-of-way, transmission lines, and non-graded roads. Each standard is listed as the percent of the pre-project condition that is expected for each metric. One of the two sagebrush metrics must meet standards, one of the two forb metrics must meet standards, and both grass and invasive annual grass metrics must meet standards for a map unit to reach compliance.

For debit projects conducting field-verification during the initial debit quantification process, reclamation results will be evaluated by resampling a random subset (scaled to map unit acreage; Table 3) of pre-project transect locations. For debit projects that conducted a

desktop-only, 100% HSI, analysis, a random set of transects will be generated and sampled or compared to the most recent remotely sensed data when applicable. The project proponent may hire a CCS certified Verifier to collect and compile the reclamation data, or the SETT will collect and compile the reclamation data.

DRAFT

Table 1. Percent of original baseline habitat scores expected to be present in each year of reclamation by habitat and 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
5 years	Sagebrush¹ 5% pre-project cover 75% pre-project count Shrub 25% 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 33% 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
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

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.

At year 10, each direct project map unit that requires reclamation will be individually evaluated for reclamation compliance by SETT. If a map unit meets standards, then no further reclamation or credit offset is required for it. If a map unit does not meet standards, then the number of debits generated by the map unit must be offset and reclamation must continue for an additional 10 years. The required credits will be prorated to a 10-year term, if the Debit Project has a term greater than 10.

For example, a Debit Project with a 30-year term and 105 reclamation debits due, are required to purchase 35 10-year credits ($30\text{yr} / 10\text{yr} = 3$; $105 \text{ 30-yr debits} / 3 = 35 \text{ 10-year credits}$). Table 2 shows the pre-project conditions and the reclamation standards based on the proration example above. This map unit did not meet reclamation standards due to the invasive annual grass cover.

Table 2. A conceptual example of pre-project conditions and reclamation standards for a map unit which does not meet all reclamation standards.

Map Unit 1; 105 30-yr debits	Pre-Project Conditions	Standards Required	Current Reclamation Conditions	Was the Standard Met?	
Sagebrush Canopy Cover	27%	3% (10% of 27%)	4%	Yes	Yes, at least one of the two sagebrush categories are met
Sagebrush Count	10	10 (100% of the 10)	12	Yes	
Shrub Canopy Cover	31%	31% (100% of the 31%)	29%	No	No, the cover is not less than or equal to the pre- project conditions
Perennial Forb Cover	2%	2% (100% of 2%)	2%	Yes	Yes, at least one of the two forb categories are met
Forb Species Richness	1.8	≥ 1.8	1	No	
Perennial Grass Cover	7%	$\geq 7\%$	8%	Yes	Yes, the cover is greater than or equal to the pre-project conditions
Invasive Annual Grass Cover	4%	$\leq 4\%$	10%	No	No, the cover is not less than or equal to the pre-project conditions

Discussion Points:

Are the sagebrush metrics reasonable?

For mineral exploration projects with concurrent reclamation, we will merge all map units together to get pre-project averages from all potential reclamation stages.

Other Notes:

1. For projects with no direct term impacts, as long as all anthropogenic features have been removed, no reclamation standards are required.
2. Permitted anthropogenic features that are removed as part of reclamation do not receive credits for the removal.
3. Habitat improvement in and around the permitted area are part of the reclamation requirements and do not receive credits.

Table 3. Number of transects per acre range in each direct term map unit.

Acres	Transects
0-25	2
26-50	3
51-100	4
101-150	5
151-200	6
201-400	7
401-600	8
601-800	9
801-1000	10
1001-1200	11
1201-1400	12
1401-1600	13
1601-1800	14
1801-2000	15