

Will help define final sideboards

Initial Policy Questions and Recommendations

- Mitigation Hierarchy – Can we assess and approve compensatory mitigation programs independent of plans or mechanisms intended to ensure avoidance and minimization on all land ownerships?
- Pre-Listing Mitigation/Regulatory Assurances – What mechanism(s) can the Service offer to program proponents or participants desiring pre-listing mitigation agreements?
- Habitat Valuation – What level of consistency is needed between methods for quantifying habitat units (including how baselines are defined)? Do these methods need to be tested/proven or will an adaptive management plan suffice? Is it ok to set aside species response in these programs for adaptive mgmt.? We aren't counting pop response in debits/credits but can use monitoring data to inform overall pop response.
- Credit Release – Should modeled outcomes or implementation of conservation actions be sufficient to release credits, or should credits be released only upon demonstration of ecological (and administrative) conditions?
- Type of Conservation Action – Should credits from preservation, enhancement, or restoration of habitat be adjusted or weighted differently?
- Land Ownership – Should land ownership dictate how credit projects are used to offset debts? Can we narrow the standards sideboards for additionality and durability on public land so they are the same level of certainty as private land.
- CCAAs – Can we provide standards or guidance to ensure mitigation on CCAA lands is additional?
- Adaptive Management – Can we provide requirements for mitigation program adaptive management which include population and/or habitat triggers?
- Duration – Should there be a consistent minimum length of time for credit projects?
- Net Gain and Ratios – Is there a minimum amount of gain required before the Service will consider a program provides a net conservation gain? Related, is there a minimum amount of risk consideration before the Service considers a program provides for no net loss?
- Can we require that state programs leave the door open for cross-state credit trading?
- Split estate and durability

Comment [SG1]: WE should carefully think about each of these – do they rise to the level of needing an answer by leadership? Should we provide a range of possibilities?

Deleted: What standards are needed to ensure that impacts are avoided and minimized before applying compensatory mitigation?

Comment [SG2]: IF programs want review of avoid/min (not just comp program), then need more capacity. MRT can comment on role of comp program in the full hierarchy picture to a point. If they want to know what standards there are for avoid/min, is a different group...

Deleted: kind or level of regulatory certainty

Comment [SG3]: Difference between programs (NV CCS) and direct agreements with FWS (e.g. Barrick). Ask Veronica.

Deleted: and through what mechanisms

Comment [SG4]: Not a policy question? Perhaps this gets fleshed out in SOP. More of a heads up to leadership...

Species response v. habitat. Look at COT. Habitat as surrogate (FR policy).

Can we tie site-level impacts and offsets to their contribution of the whole population? (migration subsidy work). Science question. Importance of adaptive management. Can pick up population response there? Importance of these metrics wit...

Comment [SG5]: May depend on level of FWS engagement project by project. Early release can encourage restoration project. We could cap the ...

Comment [SG6]: I feel like this is an "it depends" answer that is best left to local ...

Comment [SG7]: Let's discuss this one and clarify if it is land ownership per se or the additionality issue. The question might really be ...

Comment [SG8]: Not policy question more head up issue. But We have to figure out how to do this. Burden of proof on who? FWs has to provide ...

Comment [SG9]: Need to provide sideboards for program adaptive management. Can we provide ...

Comment [SG10]: Current for NVCCS = 30 years for dynamic but 10 years for term. Could also ...

Comment [SG11]: No. Heads up for leadership on our direction.

Comment [SG12]: No. if risk appropriately captured elsewhere, as per our standards, then it is not appropriate to ask for a certain amount.

Comment [SG13]: What do plans have in them now? Service areas defined in state; if species listed these boundaries will carry less weight. BLM regi...

Comment [SG14]: Not policy- but address in sideboards for risk, durability.