

# HYBRID MEETING NOTICE Truckee Meadows Stormwater Permit Coordinating Committee

DATE: September 22, 2022

TIME: 9:15 A.M.

PLACE: CITY OF RENO, CITY HALL

**6<sup>TH</sup> FLOOR CONFERENCE ROOM** 

1 EAST FIRST STREET RENO, NEVADA 89501

(There is parking available in Parking Garage

above the First Floor)

#### **Members**

Jennifer Heeran, Chair Alex Mayorga Theresa Jones James Pehrson Kevin Porter Cody McDougall

#### **Public Notice**

This agenda has been physically posted in compliance with NRS 241.020(3)(notice of meetings) at Reno City Hall – 1 East First Street, Washoe County Administration Building – 1001 East 9<sup>th</sup> Street and Sparks City Hall – 431 Prater Way. In addition, this agenda has been electronically posted in compliance with NRS 241.020(3) at http://www.reno.gov, and NRS 232.2175 at https://notice.nv.gov/. To obtain further documentation regarding posting, please contact Tara Aufiero at <a href="mailto:aufierot@reno.gov">aufierot@reno.gov</a>.

Members of the Committee may participate in this meeting using the zoom video conference platform.

Members of the public may participate in the meeting by registering through the below zoom link which will provide the meeting ID number and call-in phone number.

Virtual link: https://us06web.zoom.us/meeting/register/tZ0uc-CsrzIrGNABIXtZiToshPqilfzT-de1

In Person: 1 East First Street, 6th Floor Conference Room

#### **Accommodations**

Reasonable efforts will be made to assist and accommodate individuals with disabilities attending the meeting. Please contact Tara Aufiero at (775) 333-7751 at least 48 hours in advance so that arrangements can be made.

#### **Supporting Materials**

Staff reports and supporting material for the meeting are available by contacting Tara Aufiero at (775) 333-7751 or aufierot@reno.gov and on the City's website at Reno.Gov. Pursuant to NRS 241.020(9), supporting material is made available to the general public at the same time it is provided to the public body.

#### Order of Business

The presiding officer shall determine the order of the agenda and all questions of parliamentary procedure at the meeting. Items on the agenda may be taken out of order. The public body may combine two or more agenda items for consideration; remove an item from the agenda; or delay discussion relating to an item on the agenda at any time. See, NRS 241.020(2)(c)(6). Items scheduled to be heard at a specific time will be heard no earlier than the stated time, but may be heard later.

#### In Person Public Comment

Public comment, whether on items listed on the agenda or general public comment, is limited to three (3) minutes per person. Unused time may not be reserved by the speaker, nor allocated to another speaker. No action may be taken

on a matter raised under general public comment until the matter is included on an agenda as an item on which action may be taken.

#### **Virtual Public Comment**

No action may be taken on a matter raised under general public comment until the matter is included on a subsequent agenda as an action item.

Pursuant to NRS 241.023, those wishing to submit public comment may do so by contacting Theresa Jones by sending an email to jonest@reno.gov or by leaving a voicemail at 775-334-3311, or at the meeting during virtual public comment. Public comment is limited to three (3) minutes per person. Comments received prior to 4:00 p.m. on the day preceding the meeting will be transcribed, provided to the Board/Commission/Committee for review, and entered into the record. Comments received after 4:00 pm on the day preceding the meeting will be provided to the Board/Commission/Committee for review prior to adjournment, and entered into the record.

#### A. Introductory Items

- A.1 Call To Order/Roll Call
- **A.2** Public Comment This item is for either public comment on any action item or for any general public comment and is limited to no more than three (3) minutes for each commentator.
- A.3 Approval Of The Agenda (For Possible Action) September 22, 2022
- A.4 Approval Of The Minutes (For Possible Action) August 25, 2022

#### B. Business Items

- **B.1** Review and possible approval for payment of below invoices. The City will pay the invoices and seek 75% reimbursement from the Water Management Fund from the Western Regional Water Commission and 25% reimbursement from the Nevada Department of Transportation per the Interlocal Agreements. (For Possible Action)
  - (i) Balance Invoice # 213136-0922, dated September 13, 2022, in the amount of \$34,602.73 related to Stormwater Monitoring for FY22/23.
  - (ii) USGS Invoice #91010752, dated September 8, 2022, in the amount of \$3,380 related to Stormwater Monitoring for FY22/23.
- **B.2** Review, discussion, and possible action regarding the draft Water Quality Crediting Program Booklet outlining essential program elements including eligibility, crediting, operations, and policies. (For Possible Action)

#### C. Standing Agenda Items (Not For Action)

- **C.1** Stormwater Management Program activities including but not limited to Construction, Industrial, Monitoring, Public Outreach, Maintenance, IDDE, and Post Construction elements in support of the Truckee Meadows Storm Water Program.
  - (i) An update of City of Reno's Construction Program.
  - (ii) Annual Report data collection to begin in September, including updated Financial Questionnaire.
- **C.2** Update on Nevada Division of Environmental Protection's activities regarding federal, state, and local matters.
- **C.3** Update on Nevada Department of Transportation activities regarding MS4 activities.

- **C.4** Updates on grants and funding opportunities and projects, public presentations, volunteer opportunities and events, trainings, workshops, and conferences.
  - (i) Grant: NDEP 319(h) Nonpoint Source Grant Open 8/15/22 9/23/22;
  - (ii) CASQA Eighteenth Annual Conference, Palm Springs, CA; 10/24 10/26/22;
  - (iii) CIC (HOA) Stormwater Management in the Truckee Meadows, Virtual; 10/11/22
- **D.** Discussion and possible direction on setting the next regular meeting for October 27, 2022 at 9:15 a.m. (For Possible Action).
- **E. Public Comment** This is for general public comment limited to items that do not appear on the agenda and is limited to no more than three (3) minutes for each commentator.
- **F.** Adjournment (For Possible Action)

## MEETING MINUTES TRUCKEE MEADOWS STORMWATER PERMIT COORDINATING COMMITTEE

#### Thursday, August 25, 2022

The regular meeting of the Truckee Meadows Stormwater Permit Coordinating Committee (SWPCC) was held virtually and in person in the City Hall 6<sup>th</sup> Floor Conference Room at 1 East First Street, Reno, Nevada, and conducted the following business:

#### A. Introductory Items

#### A.1 Call to Order/Roll Call

The meeting was called to order by Chair Heeran at 9:15 a.m. and a quorum was present.

*Members Present*: Jennifer Heeran, Chair; Theresa Jones, SWPCC Coordinator; Alex Mayorga; Cody McDougall; James Pehrson; Kevin Porter

Members Absent: None

Staff and Guests Present: Susan Ball Rothe, Legal Counsel; Daniel Moss, City of Reno; Kara Steeland; Mitch Cowles, Nevada Division of Environmental Protection (NDEP); Debra Lemke, NCE; Scott Cobs, NCE; Brian Hastings, Balance Hydrologics

#### A.2 Public Comment

None

#### A.3 Approval of Agenda (For Possible Action) - August 25, 2022

MEMBER PORTER MADE A MOTION TO APPROVE THE AGENDA, SECONDED BY COORDINATOR JONES. THE MOTION CARRIED UNANIMOUSLY WITH SIX (6) MEMBERS PRESENT.

#### **A.4** Approval of the Minutes (For Possible Action) - July 28, 2022

MEMBER MAYORGA MADE A MOTION TO APPROVE THE MINUTES, SECONDED BY COORDINATOR JONES. THE MOTION CARRIED UNANIMOUSLY WITH SIX (6) MEMBERS PRESENT.

#### **B.** Business Items

- B.1 Review and possible approval for payment of below invoice. The City will pay the invoice and seek 75% reimbursement from the Water Management Fund from the Western Regional Water Commission and 25% reimbursement from the Nevada Department of Transportation per the Interlocal Agreements. (For Possible Action)
  - (i) USGS Invoice #90995814, dated July 15, 2022, in the amount of \$3,233.00 related to Stormwater Monitoring for FY22/23

MEMBER PORTER MADE A MOTION TO APPROVE, SECONDED BY COORDINATOR JONES. THE MOTION CARRIED UNANIMOUSLY WITH SIX (6) MEMBERS PRESENT.

- B.2 Review and possible approval for payment of below invoice. The City will seek reimbursement from the Water Management Fund from the Western Regional Water Commission per the Interlocal Agreement. (For Possible Action)
  - (i) City of Reno staffing reimbursement for FY21/22, in the amount of \$73,363.30 related to support of the SWPCC

COORDINATOR JONES MADE A MOTION TO APPROVE, SECONDED BY MEMBER PORTER. THE MOTION CARRIED UNANIMOUSLY WITH SIX (6) MEMBERS PRESENT.

B.3 Presentation, review, discussion and possible approval of the draft 2022 Project Reach Watershed Assessment Memorandums, prepared by NCE. Reaches include sections of Chalk Creek, Galena Creek, Jones Creek, North Truckee Drain, South Evans Creek, and Steamboat Creek. (For Possible Action)

Debra Lemke, NCE, gave an overview of the surveyed tributary project areas, including improvement concept figures. If there is a desire to apply for 319 funding, the next step would be to start working on the tributary template that has been approved by NDEP. The tributary template will help support the application process.

There was some discussion regarding the process for applying for 319 funding.

CHAIR HEERAN MADE A MOTION TO APPROVE THE DRAFT 2022 PROJECT REACH WATERSHED ASSESSMENT MEMORANDUMS PREPARED BY NCE, SECONDED BY COORDINATOR JONES. THE MOTION CARRIED UNANIMOUSLY WITH SIX (6) MEMBERS PRESENT.

- C. Standing Agenda Items (Not For Action)
  - C.1 Stormwater Management Program activities including but not limited to Construction, Industrial, Monitoring, Public Outreach, Maintenance, IDDE, and Post Construction elements in support of the Truckee Meadows Stormwater Program.
    - (i) A new organization is needed to lead the Annual Tahoe Truckee Snapshot Day (Lower Truckee Reach), an educational-focused citizen science program where teams of volunteers collect data used for watershed monitoring, and identifying potential restoration areas. SWPCC is in discussion with KTMB about sharing responsibilities for the program next spring.

Daniel Moss, City of Reno, reported that Great Basin Outdoor School asked him to see if the city or another entity might be interested in taking over the program. Keep Truckee Meadows Beautiful (KTMB) said they are very interested in taking over the program.

Brian Hastings, Balance Hydrologics, reported that Ben Hastings has left Balance Hydrologics and he will again be the Project Manager for the Stormwater Monitoring Program.

Chair Heeran reported on a preliminary investigation and feasibility report related to Peavine Creek and Truckee River Watershed.

C.2 Update on Nevada Division of Environmental Protection's (NDEP) activities regarding federal, state, and local matters.

SWPCC Meeting Minutes August 25, 2022 Page 3 of 3

Mitch Cowles, NDEP, reported they do not have any major updates. The deadline for public comments on the new Construction Stormwater General Permit is Friday.

C.3 Update on Nevada Department of Transportation (NDOT) activities regarding MS4 activities.

None

- C.4 Updates on grants and funding opportunities and projects, public presentations, volunteer opportunities and events, trainings, workshops, and conferences.
  - (i) Grant: Carson Truckee Water Conservancy District Deadline: see website;
  - (ii) Grant: NDEP 319(h) Nonpoint Source Grant Open 8/15/22 9/23/22;
  - (iii) Grant: Conserve Nevada program Grant Pre-apps due 8/15/22;
  - (iv) CASQA Eighteenth Annual Conference, Palm Springs, CA; October 24 26, 2022

Mr. Moss reported on the grants and conference listed above.

D. Discussion and possible direction on setting the next regular meeting for September 22, 2022 at 9:15 a.m. (For Possible Action)

The next regular meeting date will be September 22, 2022 at 9:15 a.m.

#### E. Public Comment

None

F. Adjournment (For Possible Action)

The meeting was adjourned at 10:07 a.m.

Respectfully submitted by, Christine Birmingham, Recording Secretary



Theresa Jones

Reno, NV 89501

**City of Reno**1 East First Street

7th Floor

#### Invoice

 Invoice #
 Date
 Amount Due

 213136-0922
 09/13/22
 \$ 34,602.73

**Project Manager:** Brian K. Hastings **Project Number:** 213136:Ph9

Job Description: City of Reno Stormwater

Billing Through: 09/10/22

Contract/PO#:

Terms: Due Upon Receipt

SUMMARY OF CHARGES		Amount
01 Data Analysis and Annual Report (FY2022)		\$13,135.00
02 Stormwater Sampling		\$7,616.25
03 Tributary Ambient Sampling (2x)		\$5,537.50
04 Streamflow gaging (5 gages)		\$3,735.00
05 Committee Meetings and Presentations		\$971.25
06 Project Management and Correspondence		\$3,207.50
Expenses		\$400.23
	Amount Due This Invoice:	\$34,602.73



#### Invoice

 Invoice #
 Date
 Amount Due

 213136-0922
 09/13/22
 \$ 34,602.73

**Project Manager:** Brian K. Hastings **Project Number:** 213136:Ph9

Job Description: City of Reno Stormwater

Billing Through: 09/10/22

Contract/PO#:

#### Theresa Jones City of Reno

1 East First Street 7th Floor Reno, NV 89501

Terms: Due Upon Receipt

#### Task 1.

- 1) Data entry for FY22 water quality data
- 2) update figures and tables
- 3) computing constituent loads
- 4) streamflow data USGS

#### Task 2.

- 1) Stormwater monitoring
- 2) instrument calibrations
- 3) coordination with staff for sampling after hours
- 4) Install Oxbow ISCO new area-velocity sensor and intake
- 5) prepare bottles for sampling

#### Task 3

- 1) Ambient sampling set up for ISCOs
- 2) Ambient sampling grab samples
- 3) update obs logs and notes
- 4) process samples from ISCOs; coordinate with lab

#### Task 4

- 1) gage site visits and datalogger downloads
- 2) manual flow measurements

#### Task 5.

- 1) Prep for committee meeting
- 2) attend August Meeting

#### Task 6

- 1) correspondence with City of Reno
- 2) Internal team meeting to coordinate field activities and transition
- 3) project management activities
- 4) coordination with lab
- 5) storm monitoring by project manager

Expenses: Mileage; AT&T telemetry; Field supplies for sampling



#### Invoice

Theresa Jones City of Reno

1 East First Street 7th Floor

Reno, NV 89501

Terms: Due Upon Receipt

Invoice #	<u>Date</u>	Amount Due
213136-0922	09/13/22	\$ 34,602.73

**Project Manager:** Brian K. Hastings **Project Number:** 213136:Ph9

Job Description: City of Reno Stormwater

Billing Through: 09/10/22

Contract/PO#:

BREAKDOWN OF TIME CHARGES	Rate	Hours	Amount
01 Data Analysis and Annual Report (FY2022)			
Project Professional	\$185.00	1.00	\$185.00
Senior Staff Professional	\$175.00	14.00	\$2,450.00
Staff Professional	\$150.00	70.00	\$10,500.00
			\$13,135.00
02 Stormwater Sampling			
Principal	\$230.00	0.50	\$115.00
Project Professional	\$185.00	7.00	\$1,295.00
Senior Staff Professional	\$175.00	20.25	\$3,543.75
Staff Professional	\$150.00	17.75	\$2,662.50
OO Telle adams A sub-land Course Harry (O.A)			\$7,616.25
03 Tributary Ambient Sampling (2x)	¢175.00	1.00	¢175.00
Senior Staff Professional	\$175.00	1.00	\$175.00
Staff Professional	\$150.00	35.75	\$5,362.50
OA Strangellaw againg (F aggs)			\$5,537.50
04 Streamflow gaging (5 gages)	¢10500	. 00	¢1 110 00
Project Professional	\$185.00	6.00	\$1,110.00
Senior Staff Professional	\$175.00	9.00	\$1,575.00
Staff Professional	\$150.00	7.00	\$1,050.00
05 Committee Meetings and Presentations			\$3,735.00
Project Professional	\$185.00	5.25	\$971.25
.,	,		\$971.25
06 Project Management and Correspondence			*******
Principal	\$230.00	2.00	\$460.00
Project Professional	\$185.00	8.25	\$1,526.25
Senior Staff Professional	\$175.00	5.75	\$1,006.25
Staff Professional	\$150.00	1.00	\$150.00
Senior Project Administrator	\$130.00	0.50	\$65.00
			\$3,207.50
Total Time Charges:			\$34,202.50
BREAKDOWN OF EXPENSES	Quantity	Rate	Amount
Field Phone	2.00	\$13.76	\$27.52
Field Supplies	2.00	\$32.00	\$63.99
Mileage Reimbursement - Personal Vehicle	189.00	\$0.680	\$128.52
Mileage Reimbursement - Truck	265.00	\$0.680	\$180.20
Total Expenses:	200.00	ψο.σσσ	\$400.23

#### Tasks & Allocation of Budget

			Previous Expenditures	This Invoice (#213136- 0922)	Total Expe		Budget Rem	aining
Task		\$ Allocated	\$ amt	\$ amt	\$ amt	% Budget	\$ amt	%
01	Data Analysis and Annual Report (FY2021)	\$44,895	¥ 20000	\$13,135.00	\$13,135.00	29%	\$31,760.00	71%
02	Stormwater Sampling (outfalls and tributaries)	\$48,650		\$7,616.25	\$7,616.25	16%	\$41,033.75	84%
03	Tributary Ambient Sampling (2x)	\$10,800		\$5,537.50	\$5,537.50	51%	\$5,262.50	49%
04	Streamflow Gaging (4 gages)	\$29,608		\$3,735.00	\$3,735.00	13%	\$25,872.50	87%
05	Committee Meetings and Presentations	\$11,610		\$971.25	\$971.25	8%	\$10,638.75	92%
06	Project Management and Correspondence	\$6,940		\$3,207.50	\$3,207.50	46%	\$3,732.50	54%
	l Labor	\$152,502.50		\$34,202.50	\$34,202.50	22%	\$118,300.00	78%
	ct Costs	\$3,936.00		\$400.23	\$400.23	10%	\$3,535.77	90%
	lytical Costs	\$23,550.00			\$0.00	0%	\$23,550.00	100%
Con	tingency	\$11,798.00			\$0.00	0%	\$11,798.00	100%
			\$0.00	\$34,602.73	\$34,602.73	18%		

Total Allocated (including contingency)	\$191,786.50
Total Expended (including current invoice)	\$34,602.73
Total remaining	\$157,183.77

## 13136



## How doers get more done.

RENO, NV 89523 (775)787-9690 STORE MANAGER JOHN MERINO

08/17/22 10:19 AM 3311 00001 00685 SALE CASHIER AYESHA

032076050610 INSL. CLAMP <A> 3/4IN RUBBER INS. CLAMP - 2PC

501.98 032076076948 INSL. CLAMP <A> 3/8" RUBBER INSULATED CLAMP 2PC

11.88 17.27 601.98 092097243002 TAPCON 3/16 <A> 17. TAPCON 3/16X1-1/4 HEX HEAD, 75 PK.

SUBTOTAL SALES TAX TOTAL

39.05 3.23 \$42.28

USD\$ 42.28

AUTH CODE 001502 Chip Read ATD A0000000980840

Verified By PIN US DEBIT

08/17/22 10:19 AM

3311 01 00685 08/17/2022 3296

RETURN POLICY DEFINITIONS
POLICY ID DAYS POLICY EXPIRES ON
1 90 11/15/2022

#### \*\*\*\*\*\*\*\*\*\*\*\*\* DID WE NAIL IT?

Take a short survey for a chance TO WIN A \$5,000 HOME DEPOI GIFT CARD

Opine en español

www.homedepot.com/survey

User ID: HTH 4970 1660 PASSWORD: 22417 1659

Entries must be completed within 14 days of purchase. Entrants must be 18 or older to enter. See complete rules on website. No purchase necessary



## **How doers** get more done.

RENO, NV 89523 (775)787-9690 STORE MANAGER JOHN MERINO

08/18/22 11:14 AM 3311 00062 18093 SALE SELF CHECKOUT

736511500691 69 MASTER KY <A> 69 KEY MASTER PADLOCK 403.67

14,68

SUBTOTAL SALES TAX TOTAL

14.68 \$15.89

USD\$ 15.89

AUTH CODE 000838 Chip Read AID A0000000980840

Verified By PIN US DEBIT

AM 3311

RETURN POLICY DEFINITIONS ICY ID DAYS POLICY EXPIRES ON 1 90 11/16/2022 POLICY ID

### DID WE NAIL IT?

Take a short survey for a chance TO WIN A \$5,000 HOME DEPOT GIFT CARD

Opine en español

www.homedepot.com/survey

User ID: H88 39786 36537 PASSWORD: 22418 36475

Entries must be completed within 14 days of purchase. Entrants must be 18 or older to enter. See complete rules on website. No purchase necessary.



Page: Jul 12, 2022 Issue Date:

Account Number: Foundation Account: 02637349

995679142X07202022 Invoice:

2 of 11

#### Service activity

			Activity since	Monthly	charges	Company fees &	Government fees	
Number	User	Page	last bill	Plan	Add-ons	surcharges	& taxes	Tota
			-				-	
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Wireless continues...

Total



 Page:
 2 of 11

 Issue Date:
 Aug 12, 2022

 Account Number:
 Aug 12, 2022

Foundation Account: 02637349

Invoice: 995679142X08202022

#### Account activity



#### Service activity



Wireless continues...

DI-1040

#### UNITED STATES DEPARTMENT OF THE INTERIOR DOWN PAYMENT (BILL) REQUEST

Page:1

Make Remittance Payable To: U.S. Geological Survey

Billing Contact: Quarterly billing for joint fu Phone: Helen Houston

Bill #:

91010752 Customer: 6000001960

Date:

09/08/2022 Due Date: 11/07/2022

Remit Payment To:

United States Geological Survey

P.O. Box 6200-27

Portland, OR 97228-6200

RECEIVED

SEP 13 2022

Payer:

CITY OF RENO

PUBLIC WORKS DEPARTMENT 7TH FLOOR, CITY HALL/PO BOX 1900

**RENO NV 89505** 

To pay through Pay.gov go to https://www.pay.gov.

CITY OF RENO Public Works Department

Additional forms of payment may be accepted. Please

email GS-A-HQ RMS@USGS.GOV or call 703-648-7683 for additional information.

Checks must be made payable to

U.S. Geological Survey. Please detach the top portion

or include bill number on all remittances.

Amount of Payment: \$

Date	Description	Qty	Unit Prid	ce	Amount
_	, and the second		Cost	Per	
09/08/2022	22ZJJFA00118	1	3,380.00	1	3,380.00
			Amount Due	this Bill:	3,380.00

Accounting Classification: Sales Order: 107453 Sales Office: GWZJ Customer: 6000001960 Accounting #: 11282810

TIN: \*\*\*\*\*0201



## WATER QUALITY CREDITING PROGRAM OVERVIEW

### Why develop a crediting program in the Truckee Meadows?

A crediting program can provide flexibility to achieve water quality objectives more cost effectively and create a net environmental benefit. Earning water quality credit for projects that are already planned and gaining certainty about the crediting process will inspire project proponents to invest in watershed protection projects.

A tangible example: installing reverse osmosis treatment at TMWRF will cost \$269,000,000 for capital-costs only, while planned stream restoration or low impact development projects could reduce some pollutant loads for much lower cost. It is well understood that there are also much greater co-benefits of the latter project types.

## Who is this booklet for and how should it be used?

Truckee Meadows permittees, regulators and active stakeholders can use this booklet to: I) understand recommended crediting program design concepts, 2) have clear conversations about their preferences, and 3) come to consensus-seeking decisions about the concepts and details that will be included in a draft program design document.

### What are the enabling regulatory instruments?

Section I.A.5 of the TMWRF permit (NPDES Permit NV0020150) allows for offset projects to meet individual waste load allocations.

Section I.A.4 of the TMWRF permit allows for annual reallocation of waste load allocations as a minor permit modification.



## **ESSENTIAL PROGRAM ELEMENTS**

A water quality crediting program can best be described by the "elements" of which it is composed, such as the Credit Definition or the Project Crediting Process. To facilitate rapid reader uptake, the elements are grouped into related elements in this booklet. Each element provides a brief introduction, recommended program design, and (where needed) relevant program options.

## **Program Operations** (Slide 4)



Roles & Responsibilities



**Project Crediting Process** 



Reporting & Adaptive Management



Program Policies

## **Eligibility** (Slide 9)



Eligible Parties & Projects



Eligible Area

## **Crediting** (Slide 13)



**Credit Definition** 



Credit Method



**Credit Verification** 



**Credit Tracking** 



## PROGRAM OPERATIONS



The general functions that agencies and their people perform for the crediting program.

When assigning roles and responsibilities, it is important to consider motivation, accountability, and level of effort. It is valuable to harness the motivation of public and private organizations to complete projects. Roles must take into account potential conflict of interest and accountability needs when approving plans. While distributing roles avoids concentration of effort, it may increase overall administrative burden due to increased coordination efforts.

### **Recommended Program Design**



**Project Proponent.** Public or private entities seeking water quality credit for their project or using credits that have been awarded, even if the credits were generated from a project for which they are not responsible. When developing projects, they are responsible for project development, implementation, and maintenance. For example, TMWRF, the City of Reno, a casino, a land trust, or a private stream owner could all be *Project Proponents*.



**Regulator.** A public agency that defines pollutant load reduction requirements and oversees permittee compliance. The *Regulator* is the only participant that can award credits. In this case, there is only one *Regulator*: NDEP.



**Program Administrator.** A public agency that is responsible for program coordination and tracking. Possible *Program Administrator* options include a long-term, local agency such as a conservation district; or possibly the City of Reno or NDEP.



**Verifier.** A trusted public or private entity who has been accepted by the *Regulator* to inspect projects, ensuring they meet expectations. There are two types of *Verifiers*, a *Third-party Verifier* and a *Peer Verifier*.

**Third-party Verifier**: Involved in primary verification and potentially ongoing verification. Possible *Third-party Verifiers* include Washoe-Storey Conservation District, University of Nevada, or others.

**Peer Verifier**: A public agency that is involved in the program and can provide ongoing verification. For example, the City of Sparks could provide an ongoing verification review for a City of Reno project.

## **Relevant Options**

**Regulator as Verifier**. It is possible that the Regulator could serve as a project Verifier. However, Project Proponents often complain in this case because they perceive bias in the verification results. This option will also add to the effort level of NDEP.

Minimize NDEP branches involved in decision-making to streamline the program, resulting in reduced administrative load. For example: If there are three NDEP branches involved in pre-project review and approval, then there is more than three times the amount of effort required due to additional coordination needs.

**Example:** Projects generating credits within the <u>Idaho Department of Environmental Quality (ID DEQ)</u> water quality trading program go through an initial verification step, which may be conducted by the permittee, a third party, and/or ID DEQ. Similarly, verification for some projects generating credits within the Truckee Meadows crediting program could be conducted by third parties or peer verifiers.

A well-designed approval process is essential for the program's transparency, consistency, and ease of use. Allocating steps to be led by third parties can reduce administrative burden on participating agencies, but will still require compensation, training, and oversight.

#### **Recommended Program Design**



**I. Credit plan submissions.** *Project Proponents* submit two credit-focused plans. The <u>Credit Development Plan</u> shows how the project meets the eligibility requirements, how many credits are expected, input parameters to the credit method, and the observable conditions to be created on the project site. The <u>Credit Maintenance Plan</u> describes the conditions to be maintained over time and the rapid assessment approach used to confirm credits over time.



2. Pre-project review and acceptance. The Regulator reviews and works with the Project Proponent to decide if credits are calculated appropriately and approves the Credit Development Plan. This requires a technical understanding of the program, particularly as it relates to the credit method. The step is complete when the Regulator either accepts the plan or the Project Proponent withdraws the project.



**3. Project implementation**. Following any required permit approvals (e.g., grading, Section 404), on-the-ground project work such as project construction, restoration, or program implementation can begin. Project implementation activities should follow the <a href="Credit Development Plan">Credit Development</a> Plan and design documents.



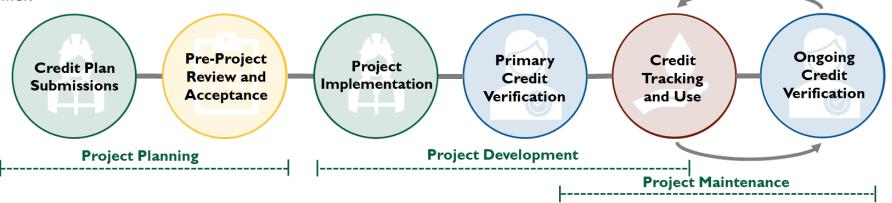
**4. Primary credit verification.** A Verifier visits the project site to confirm that the completed project matches the conditions laid out in the Credit Development Plan. The Verifier then makes a recommendation to the Regulator. If the Regulator deems the project satisfactory, credits are "awarded". This verification is generally completed by a trained, third-party verifier.



**5. Credit tracking and use.** The *Program Administrator* inputs and maintains project and proponent information and the associated credits in a registry. *Project Proponents* generate and are awarded credits. Credits are used by *Project Proponents* as compliance needs arise. This spreadsheet is viewable by all program participants, but editable only by the *Program Administrator*. If the program grows large enough, an online registry can be useful.



**6. Ongoing credit verification.** A Verifier confirms the project maintains the conditions that generate credits using the rapid assessment approach described in the <u>Credit Maintenance Plan</u>. This step is repeated annually. This verification is generally completed by an independent, peer verifier.



**Example:** All US water quality trading programs have developed process diagrams and supporting guidance. The Laguna de Santa Rosa program describes their Credit Plan Approval Process on <u>page 16 of their program framework document</u>. The Truckee Meadows program will clearly define the project approval process in its entirety in the 20–30-page Crediting Program Document.

## **REPORTING & ADAPTIVE MANAGEMENT**

The process by which the program is reported and enhanced over time.

Programs regularly report success publicly and incorporate stakeholder feedback or new science. When evaluating the program, the *Program Administrator*, program participants, and stakeholders can consider changes to eligible projects, crediting methods, and program policies. It is important to find a balance between consistency and change—consistency brings efficient execution, while change keeps the program relevant as new information is revealed by experience and research. Adjustments to the program may need greater or lesser effort for approval and stakeholder acceptance, depending on the extent and type of the adjustment.

## **Recommended Program Design**

The program adaptive management approach is a low-effort process that occurs regularly – ideally every other year. However, this does not mean that the program will be modified every cycle.

- I. Track and Report Performance. The credit registry can provide a reliable and convenient source of information to produce a 2-page Biennial Report of program accomplishments for political audiences, or to update a website for stakeholders.
- 2. Recommend Adjustments. Based on reported performance, stakeholder feedback about the program, and new scientific findings, the *Program Administrator* develops a draft <u>Program Recommendations Memo</u> (5-10 pages). This memo is then discussed by staff from the *Regulator* and permittees.
- 3. Adopt and Implement Adjustments. Recommendations from the <u>Program Recommendations Memo</u> are either adopted or rejected in an executive meeting of active *Program Participants* and the *Regulator*. The meeting outcomes are captured in a brief meeting report and staff are directed to implement adopted adjustments.
- 4. Engage Stakeholders. Ongoing stakeholder engagement includes formal feedback via a "suggestion box" on the program website and a stakeholder meeting that occurs once per cycle. The stakeholder meeting is focused on presentation and comments related to the Program Recommendations Memo.



**Example:** The Tahoe program website has a <u>Program Management page</u> where all adaptive management documents are made available to stakeholders. The Truckee Meadows program will have fewer and shorter products than the Tahoe program.

## PROGRAM POLICIES

The crediting program can anticipate several situations that may arise over time and adopt policies that set expectations for how to handle these situations. These and other policies are likely to be helpful for *Project Proponents* who use credits and the *Program Administrator* as they implement the crediting program.

## **Recommended Program Design**



**Conflict resolution policy**. Some decisions may eventually become high stakes for program participants and eventually lead to conflict over the decision. Other crediting programs have benefited from a clear process to make decisions when the parties are unable to agree, for instance when dischargers and regulators do not agree on a credit award. This policy focuses the conflicting parties to write a short conflict resolution memo describing the overall issue, the positions of each party, and a resolution action. This memo is then signed by the necessary authority of each party – potentially upper management or an executive. The intent of this policy is to elevate the conflict only as far as necessary within each party's agency to minimize the effort required and move forward quickly.



**Transaction agreement guidance**. If awarded credits are exchanged with another party or waste load allocations are adjusted, a written agreement will be needed. The <u>Crediting Program Document</u> will include guidance about the subjects that should be included in the agreement, such as: condition metrics, payment terms, assurances, and access.



**Liability for purchased credits**. Financial assurances are used to ensure the durability of the outcomes generated by the credit project. These assurances usually consist of a contract with clear penalties for non-performance or financial instruments, such as an endowment, letter of credit, or contract surety bonds that become active only if a project does not deliver credits over time. Regulators are typically allowed to comment on liability assurances for purchased credits.



**Compliance grace period**. In situations where a permittee is using purchased credits for compliance, it is possible that one of the ongoing credit verifications shows conditions worse than planned, thus credits are not awarded. In this case, it is essential that a reasonable amount of time is available for the permittee to find another source of credits. For the Truckee Meadows, a 12-month compliance grace period provides a reasonable balance of urgency to comply with time needed to source new credits.

**Example:** The Ohio River Basin trading project does not require documentation of stewardship funds for approval of projects or credits. They do withhold annual payment until project installation has been confirmed. Similarly, the Truckee Meadows program can remain agnostic about financial assurances for parties of a credit transaction.

## **ELIGIBILITY**



The agencies or landowners that generate credits, and the actions taken by them.

Section I.A.5 of the TMWRF permit allows for "offset" (i.e., credit) projects, and section I.A.4 specifically mentions waste load reallocation among permittees. Eligible parties are the entities allowed to participate in the crediting program, potentially creating credits through sponsorship of projects or using credits for their compliance needs. Eligible projects implement actions to achieve water quality baseline requirements and potentially exceeding them to earn additional credit that can be tracked within the program.

## **Recommended Program Design**



Eligible parties are *Project Proponents*, who create and/or use credits. *Project Proponents* can include entities that are public or private and regulated or unregulated. Regulated dischargers, who generally have to carefully manage TMDL pollutants of concern, are likely to use credits generated by themselves or other entities.



**Defined pre-approved project types** (i.e., best management practices (BMPs)), including structural and programmatic activities, for which benefits can be estimated through an agreed upon crediting method, such as a water quality model. See the next slide for expected pre-approved project types. More pre-approved project types can be added later through an adaptive management process.

## **Relevant Options**

**Grandfathering**. Allow projects occurring in recent years to be eligible so that participants can quickly test the value of the program and ramp up transactions.

**Example:** The <u>Idaho Department of Environmental Quality</u> recognizes crediting between point and nonpoint sources, and crediting projects must use an approved project type to generate credits. We recommend structuring the Truckee Meadows Crediting program similarly, to build certainty and efficiency in the credit approval process.

## RECOMMENDED PRE-APPROVED PROJECT TYPES



Stream Restoration Establishing or re-establishing biological, physical, and chemical stream characteristics through activities such as channel reconfiguration, cattle fencing, or planting native plants. Permittees or rural property owners are likely *Project Proponents* of this project type. Any project that quantifiably reduces pollutants would exceed the baseline. A model would be a suitable method for quantifying credits for this project type.



Urban Pond Management Changes

Changing the way urban ponds are managed to reduce pollutants, via diversions or other means. Municipalities and industrial site owners are likely *Project Proponents* of this project type. A baseline would need to be established for the operations of the pond at the time of the TMDL study. A model would be suitable for quantifying credits for this project type.



Green Infrastructure Retrofit Nature-based features that treat runoff from impervious surfaces (e.g., bioswales, raingardens, treewells). These features may result from development ordinances for private property, or municipal projects that treat public land. Stormwater permittees are likely to implement green infrastructure retrofit programs. The baseline is defined in stormwater permit requirements. A model would be suitable for quantifying credits.



Private
Property
Incentives

Payments to property owners for actions such as reducing agricultural runoff, rainwater capture, and turf replacement. Stormwater permittees are likely *Project Proponents* of private property incentives. The baseline is the area of impervious surface or other pollutant-contributing land use at the time of the TMDL study. A model or pre-approved load reduction estimates would be suitable for quantifying credits.



Transitioning from septic system use to a sewer connection. Private property owners are likely *Project Proponents*. The baseline is the number of sewage connections at the time of the baseline model run. A pre-approved load reduction estimate for each toilet converted would be suitable for quantifying credits.

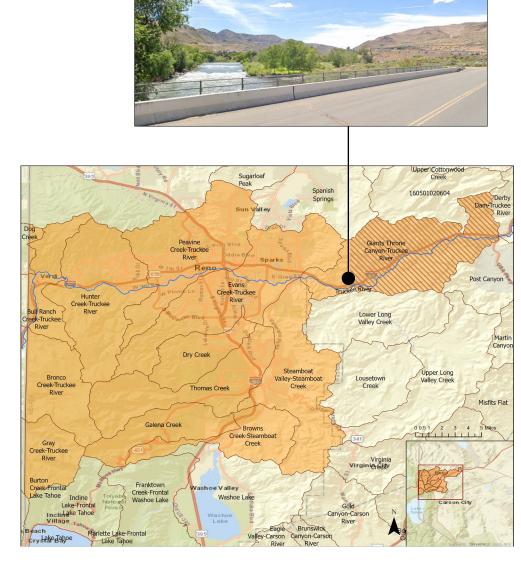
Water quality crediting programs designate point(s) of concern where progress will be assessed. Larger eligible areas increase potential for transactions that provide flexibility and net environmental benefit. To avoid localized exceedances water quality standards, a trading program may require buyers to purchase credits only from sources upstream of the discharge or point of concern.

## **Recommended Program Design**

Projects must be located within the HUC-12 Truckee River watershed within the State of Nevada.

Designate Lockwood Bridge as the point of concern to align with pollutant load monitoring outlined in permits and with the intent to protect water quality for important fish species, like Lahontan cutthroat trout. Credits developed from eligible projects downstream of the point of concern would be subject to a ratio.

Maximize transaction potential by allowing upstream and downstream crediting. The watershed in the area is urbanized and homogeneous to the point that hotspots are not a significant concern. The overall program is designed to protect water quality heading east out of the eligible area. The largest point sources are from wastewater plants, and those loads will not change significantly.



**Map**:Truckee River watershed (HUC-12), focused on Nevada. **Photo**: Lockwood Bridge, the recommended down-stream limit.

**Examples: 1)** The <u>Tahoe program</u> uses the HUC-8 definition of a watershed, including all land in the Tahoe Basin. The Truckee Meadows program can be based on the finer, HUC-12 watershed to maximize the inclusion of relevant areas within the region. 2) The <u>Wisconsin Department of Natural Resources</u> enables trades at a watershed level (upstream or downstream of a point of discharge) and across state lines. The Truckee Meadows program can similarly allow upstream and downstream trading but will limit transactions to the Nevada portion of the Truckee River watershed.

## CREDITING



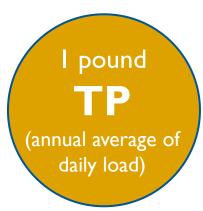
The quantity of benefit resulting from a project; such as acres of impervious surface treated, or pounds of nitrogen reduced.

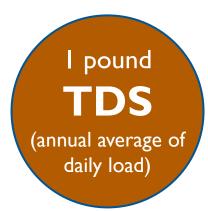
Most crediting programs focus on nitrogen and phosphorous, while others include runoff volume, sediment, and temperature. The Truckee Meadows total maximum daily load (TMDL) focuses on 3 pollutants, stating that the sum of individual waste load allocations at Lockwood Bridge cannot exceed 900,538 pounds (lbs) per day of total dissolved solids (TDS), I,000 lbs/day of total nitrogen (TN), and 214 lbs/day of total phosphorous (TP). A recent watershed plan found a single stream restoration project had the potential to reduce 0.22 lb/day of TN and 0.11 lb/day of TP.

## **Recommended Program Design**

One credit is equal to a modeled, annual average of Ilb/day of TN, I lb/day of TP, or Ilb/day of TDS, based on the sum of the waste load allocations listed above. Offering three types of credits (TN,TP, and TDS) supports permittees in meeting permit compliance and avoids inappropriately binding multiple pollutants into one credit. Credit types are independently calculated and tracked using a method appropriate for the project type. A project may generate a single credit type or multiple credit types; for example, an urban pond treatment project may generate 60 TN credits, I2 TP credits, and 400 TDS credits.







Credit life. Every credit must match the compliance cycle for the permittee. Projects need to be checked annually to ensure that they are generating expected benefits and thus credits for compliance purposes that year.

I 2020 Watershed Management And Protection Plan For Tributaries To The Truckee River. City of Reno. January 2020. https://www.reno.gov/home/showpublisheddocument/83261/637152995834430000

**Example:** <u>Tahoe</u>'s Lake Clarity Crediting Program defines a credit as 200 pounds of ultrafine sediment and associated nutrients (TP, TN) and requires annual confirmation of project condition to award credits. The Truckee Meadows program is similar but does not associate the nutrients to TDS because a scientific relationship is not documented.

## **CREDIT METHOD**

Crediting methods are based on the best available science, practicality, and the project types included in the program. The crediting method must be repeatable, transparent, and practical to enable transactions. Other programs use modeling, pre-determined rates, and direct monitoring for quantifying credits.

The Truckee Meadows TMDLs are based on the Dynamic Stream Simulation and Assessment Model (DSSAM II).

## **Recommended Program Design**

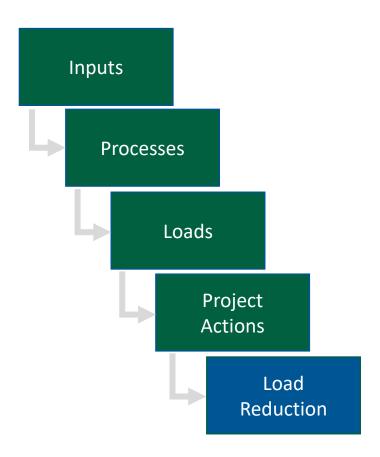
**Stakeholder-approved baseline load.** The program can develop a water quality model that captures conditions in the watershed at the time of the TMDL. Stakeholders will need to build consensus on model inputs and parameters. Later, as proponents build projects, they can subtract awarded credits from the baseline.

**Credit methods designated by project type.** Three potential methods for quantifying credits for load reductions include

**Modeled rates** with one of two simple modeling options, mechanistic (watershed-scale) or empirical (field-scale). WARMF is a mechanistic model and was previously used to estimate pollutant loads for the Truckee River watershed. The EPA's PLET is an empirical model. PLET could be used to estimate load reductions; however, PLET only computes surface runoff, sediment delivery, and nutrient loads (N, P, and biological oxygen demand).

**Pre-determined rates** by project type, derived from research (e.g., literature review or modeling), which are easy to implement and maintain. Note that pre-determined rates need to be scaled according to project size, but do not account for highly-variable and localized conditions.

**Direct monitoring**. Direct monitoring provides the most certainty, but requires the most resources to implement and provides results that are particularly "noisy" due to weather variability for non-point sources.



The general structure and output of a model.

**Example:** The <u>Idaho Department of Environmental Quality</u> allows several methods to estimate credits if direct monitoring is infeasible due to weather variability or too expensive. A similar approach may be valuable for the Truckee Meadows program.

## **CREDIT VERIFICATION**

Reviews to determine if I) there is agreement that appropriate inputs were used in the credit calculation, and 2) site conditions are similar to those listed in plans.

When a program verifies on-the-ground conditions, regulators can have confidence that: I) water quality benefits have been achieved as expected and 2) benefits are maintained before credits are awarded. Verifications are often carried out by inspectors with specialized training that allows them to complete the process with appropriate quality and cost effectively. Some programs allow for self verification by *Project Proponents* with regulatory validation of a portion of the self verifications.

## **Recommended Program Design**

**Primary verification.** An extensive process that is done soon after a project is complete to award credits. These verifications are done by the certified verifier that is approved by the program. The verification checklist includes:



Confirmation that expected conditions are achieved and construction meets plan specs



Agency approvals



Credit proposal



Credit award decision

**Ongoing verification.** Conduct rapid assessments to ensure conditions are maintained over the life of the project. Ongoing verification is performed on the same interval as compliance determinations (annually for most permittees). An example of a potential rapid assessment for a stream buffer project would be a drive-by observation for integrity of a cattle-excluding fence with photo documentation of healthy plant cover.

## **Relevant Options**

**Self-reporting.** Consider if self-reporting ongoing credit verification is appropriate for some project types. Self-reporting by *Project Proponents* would reduce costs and increase project investment by allocating greater portions of available budgets to implementation or maintenance rather than verification.

**Credit reduction schedule.** When conditions are not achieved or maintained, a transparent schedule for reducing awarded credits is better than an "all or nothing" approach. This reduces the intensity of negotiations that occur around the verification.

**Example:** The Nevada Sagebrush Ecosystem Program assigns certified verifiers to each project, assessing the projects before awarding credits and for annual checks. The Truckee Meadows can similarly use verifiers, and may consider regular trainings for verifiers to align with ongoing program adaptive management.

The approach used to track projects and account for credits, using a system that is the official record of transactions.

Most crediting programs enter projects into a "registry" spreadsheet after they are "awarded" by a regulator. The registry also captures ownership information when credits are used. At the time of a transaction, project documents, credit amount, credit creator/user information, and any trading ratios applied are tracked in the registry. In many crediting programs, the registry is managed a relevant state agency or local, third-party administrator with a long-term interest in the region. It's important to establish clear editing and viewing roles during the registry development.

## **Recommended Program Design**

**Credits are tracked through their life cycle using a centralized spreadsheet**, referred to as the Credit Registry. The *Program Administrator* will manage the Credit Registry and can make appropriate data viewable based on program roles. Only the *Program Administrator* has editing capability of the registry.

**I:I.I** ratio applied to all credits to ensure net environmental benefits. This ratio ensures that there is a structural mechanism to achieve this explicit program goal. Note, there are likely additional co-benefits (e.g., carbon sequestration, reduced heat island effect, job creation) that will not initially be tracked in the Project Registry.

**Parties to a transaction negotiate credit prices**. Credit prices are often proprietary, and *Project Proponents* may prefer to keep prices to themselves. *Regulators* do not need to know credit prices when credits are used for compliance.

## **Relevant Options**

**Apply a 1:1.5 ratio to credits developed downstream of the Lockwood Bridge.** This discount ratio likely to increase the number of transactions while accounting for the lower certainty of measurable benefits from projects below the point of concern (Lockwood Bridge).

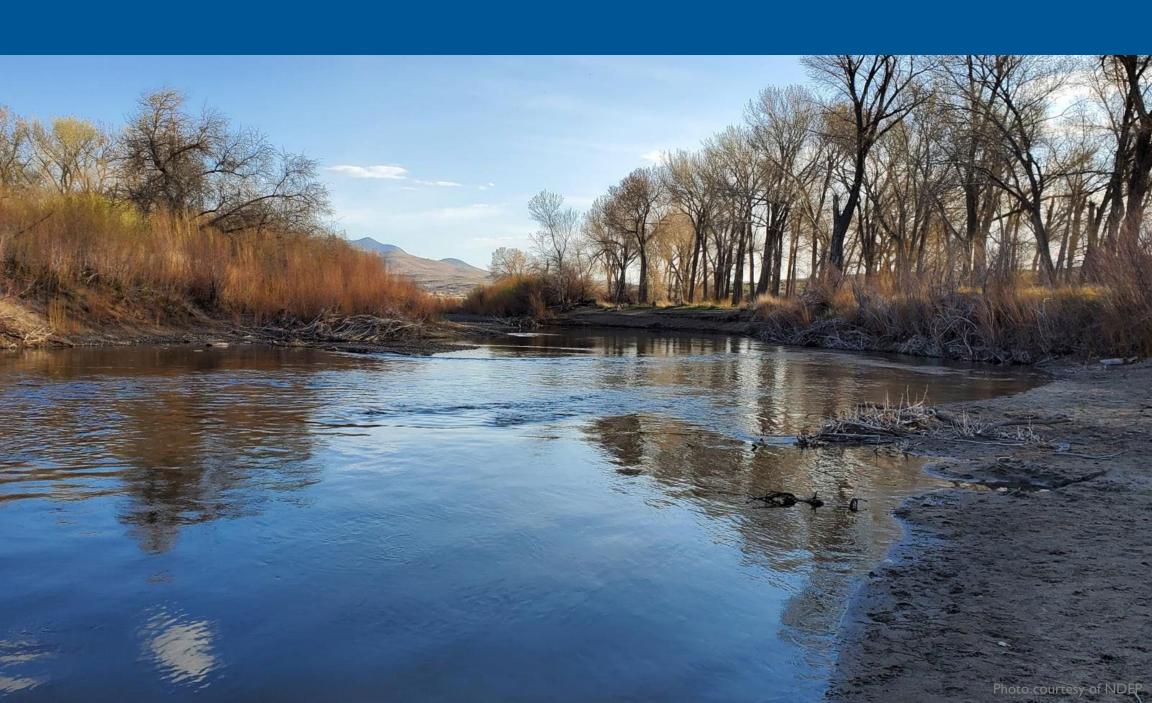
Apply a 1.25:1 ratio to credits developed within a disadvantaged community or on Tribal lands. Disadvantaged communities experience disproportionately high rates of environmental and water quality degradation. This credit augmentation for projects in these communities can help target benefits where they are most needed and serve environmental justice goals.

### **Example Credit Registry Field Categories**

Field Category	Types of Information Included
Contact Information	Name, email, and phone number for permittee, creator, and verifier
Project Information and Documents/ Files	Location of the project (address, watershed, coordinates), project(s) implemented, project design files, agreements and plans
Verification Checklist	Details included based on the initial and ongoing verification checklists
Credit Serial Number	Autogenerated based on the project, year of issue, project type, and credit type
Credit Status	Pending verification, actively used for compliance, suspended, cancelled
Trading Details	Date of trade, ratio(s) applied, projects and credits included

**Examples:** The <u>Florida Department of Environmental Protection</u> tracks credits generated and posts information to the program website via PDF. The Truckee Meadows program could publish the registry similarly. The <u>Idaho Department of Environmental Quality</u> does not require application of an uncertainty factor if credits are measured by direct monitoring.

## **APPENDICES**



## APPENDIX A: EFFORT SUMMARY BY ROLE

The effort needed to operate the Truckee Meadows crediting program is designed to be relatively low compared to the effort of completing projects and complying with permit requirements. The estimates below are divided into time needed to receive credit for a hypothetical project and time needed to operate the program, independent of projects. The early estimates below are based on expert experience and intended to support agency resource forecasting and program design decisions.

		Project Proponent	Regulator	Program Administrator	Verifier
Project Hours	First Year (% FTE)	<b>200</b> (10%)	I 50 (8%)	25 (2%)	150 (8%)
	Annually After First Year (% FTE)	<b>&lt;25</b> (<2%)	<25 (<2%)	<25 (<2%)	25 (2%)
Programmatic Hours	Start Up* (% FTE)	200 (10%)	350 (18%)	800 (40%)	250 (12%)
	Ongoing Annual (% FTE)	<b>75</b> (<5%)	I 50 (8%)	400 (20%)	100 (5%)

<sup>\*</sup>There will be some additional consulting fees for developing a Baseline Water Quality Model and a program website.



## APPENDIX A: EFFORT ANALYSIS, PROJECT FOCUS

The table below presents the estimated time to complete each step of the project crediting process. Key considerations and assumptions:

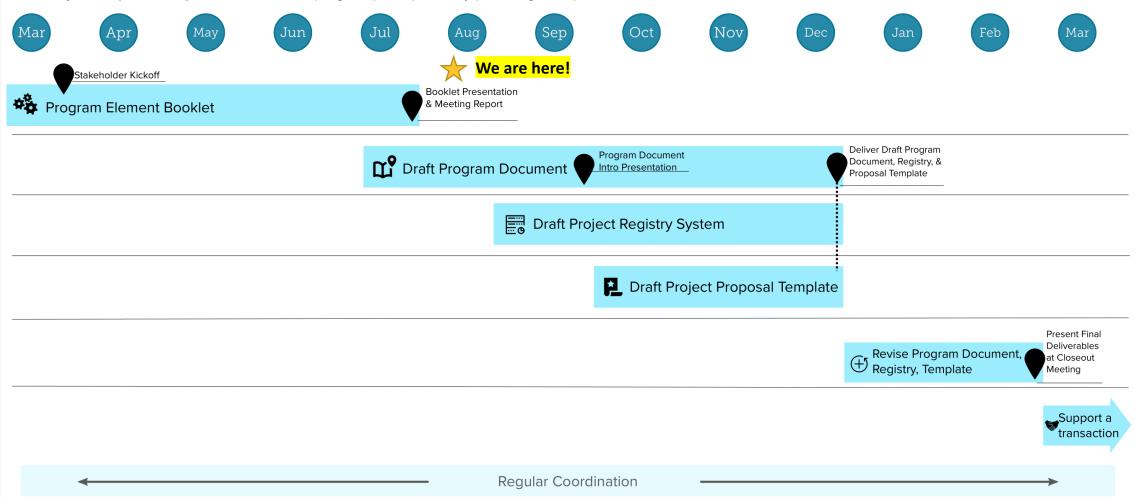
- There are I-3 projects/transactions per year.
- The estimate hours are for third time everyone has done this process. Initially, it will take everyone longer to work through these steps, potentially twice as long.
- All estimates are 95% probable to be within +20% and -10% range.

Process Step	Estimated Level of Effort (hours per project)	Rationale
	Proponent: I20	Preparing the Credit Development and Credit Maintenance plans requires collecting
I. Credit Plans Submission	Program Admin: 8	numerous documents in addition to calculating credits.
2. Pre-project review and	Regulator: I 20	In addition to reviewing the Credit Development and Credit Maintenance plans, the  Regulator will need to coordinate with the Project Proponent and the Program Administrator.
acceptance	Proponent: 60	These hours may increase if the project is complex and/or requires multiple rounds of review.
2 Project Implementation	Proponent: 8	The time shown is reflective of the <i>Project Proponent</i> 's coordination with the <i>Program</i>
3. Project Implementation	Regulator: 8	<ul> <li>Administrator and Regulator regarding credits. It is <u>not</u> the time it takes to implement the project.</li> </ul>
4. Credit Verification	S Verifier: I 20	
	Regulator: 16	The administrative review, site visit(s), and technical review of credit calculations is a deep conditions check requiring substantial effort by the <i>Third-Party Verifier</i> . There is also a
	Program Admin: 8	significant amount of coordination involved with all parties. The level of effort assumes the  Regulator accepts the initial recommendation from the Third-Party Verifier.
	Proponent: 8	
	Program Admin: 8	Tracking credits in the registry is a low effort task for the Program Administrator but does
5. Credit Tracking*	Regulator: 4	include some coordination with the <i>Project Proponent</i> and <i>Regulator</i> for a final check. *Note this is an ongoing activity for the life of the project and will require effort on a yearly basis.
	Proponent: 4	The value shown is for one round of credit tracking (annual).
	Register Verifier: 20	
6. Ongoing Verification*	Regulator: 8	A Third-Party or Peer Verifier reviews and checks the Credit Maintenance Plan which involves minor coordination with the Project Proponent and Regulator. *Note this is an ongoing activity
	Program Admin: 4	for the life of the project and will require effort on a yearly basis. The value shown is for one condition check (annual).
	Rroponent: 4	

## Where are We in this Effort?

The Gantt chart below provides the suggested timelines for drafting and delivering the following:

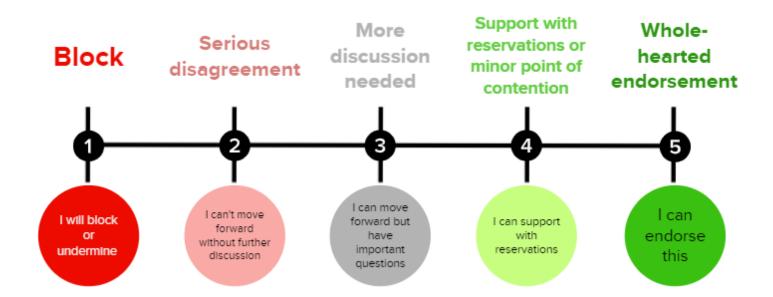
- Program Element Booklet, featuring options and recommendations to create a viable crediting program
- Crediting Program Document that builds on the Program Element Booklet with additional context for program development
- Project Registry System to track and account for credits
- Project Proposal Template that facilitates program participation by providing a simple fillable form





## Stakeholder Feedback Request

- Using agreement scale to communicate your initial reactions
- Feedback will be incorporated into the Program Document
- One feedback form per agency
- Due Aug. 12 to Molly Daniels







## **QUESTIONS?**

CALL CHAD (530) 318-4540
OR
EMAIL MOLLY AND CHAD
MDANIELS@ENVIROINCENTIVES.COM
CPRAUL@ENVIROINCENTIVES.COM

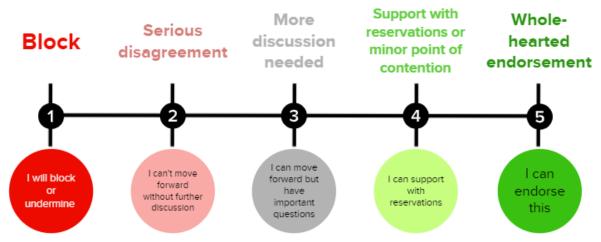


## Crediting Program: Stakeholder Feedback Request

Program designers are requesting your organization take some time to look through the Draft Program Booklet and provide feedback. We will be using the level of agreement scale below to gather and organize your thoughts on the concepts in each of the program elements. Please use this scale and the accompanying Draft Program Booklet to fill out the table on the following page. We are looking for high-level feedback on the concepts rather than editorial comments on grammar or spelling. If there are overarching comments, questions, and impressions on the program, please use the space after the table to include that feedback. We request that each agency fill out one form. However, we understand that there may be different viewpoints within the agency and ask for that information to be captured, as well.

Please return this completed form to Molly Daniels (<u>mdaniels@enviroincentives.com</u>) by 5pm on August 12.

FIGURE 1. LEVEL OF AGREEMENT SCALE



STAKEHOLDER FEEDBACK FORM PAGE 1



ELEMENT	AGREEMENT	RATIONALE
Refer to the PDF for content.	RATING	If you selected 1 or 2: What needs to change to make the element more favorable?
	Select 1-5	If you selected 3: What questions do you have?
	(where 5 is the highest	If you selected 4 or 5: What do you like about the element?
	agreement)	
Roles & Responsibilities		
Project Crediting Process		
Program Reporting & Adaptive Management		
Program Policies		
Eligible Parties & Projects		
Eligible Area		
Credit Definition		
Credit Method		
Credit Verification		
Credit Tracking		

STAKEHOLDER FEEDBACK FORM PAGE 2



## OVERARCHING COMMENTS AND CONCERNS

{Use this space to provide your organization's general impression of the program. This may be helpful for topics that relate to many elements or just do not fit the structure provided.}

STAKEHOLDER FEEDBACK FORM PAGE 3