

Multi-Credit Restoration Banking

RestorCap LLC

INVESTING IN NATURE. RESTORING RESTOR



TYPES OF CREDITING

- Carbon Credits
- Wetland Mitigation Credits
- Riparian Mitigation Credits
- Endangered Species Act (ESA) Credits
- Natural Resource Damages (NRD) Credits
- Specialized Credits



NRD CREDITS

- Can be assessed either under Oil Pollution Act (OPA) or CERCLA
- BP Oil Spill OPA
- Governed by Trustee Councils
- Settlement options for RP
- Common currency for liability assessment and restoration crediting – Discounted Service Acre Years (DSAYs)
- DSAYs calculated using Habitat Equivalency Analysis (HEA)



LINNTON RESTORATION SITE

- Located in Portland Harbor Superfund Site
- Approximately 25 acre site
- 500+ NRD Credits anticipated
- Of those, approximately 320 anticipated to be approved as Section 404 Aquatic Mitigation Credits















CHALLENGES OF MULTI-CREDIT BANKS

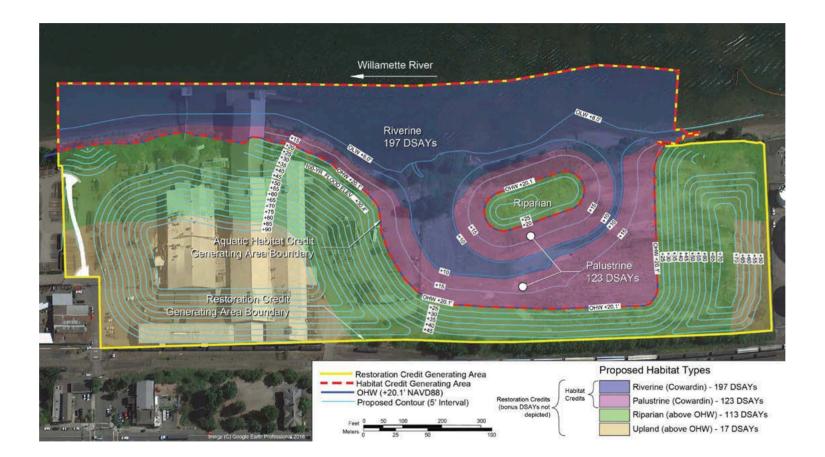
- Setting Common Crediting Currency
- Credit Tracking/Ledgers
- Reconciling Performance Standards
- Financial Assurances
- Timing of Project Approval Processes



SETTING COMMON CREDITING CURRENCY

- NRD liabilities/crediting based on DSAYs
- Traditional mitigation crediting based on acreage
- Some NRD credits may not qualify as mitigation credits
- Challenge in translating mitigation liabilities
 into DSAYs







CREDIT TRACKING/LEDGERS

- Need to ensure no "double counting" of different types of credits
- Challenges in coordinating differing credit release schedules
- RIBITs typically doesn't track DSAYs
- Portland Harbor Trustee Council currently working to integrate NRD ledgers into RIBITs system



RECONCILING PERFORMANCE STANDARDS

- Trustee Council and Interagency Review Team (IRT) may have differing performance standards/expectations of a project
- Requires close cooperation between TC and IRT



FINANCIAL ASSURANCES

- Trustee Council and IRT will have differing financial assurance requirements
- Bonds, adaptive management funds, conservation easements, long-term stewardship
- Main issue enforcement accessibility
- May result in duplicative financial assurance instruments



TIMING OF PROJECT APPROVAL PROCESSES

- Trustee Council and IRTs will have different
 processes and timelines for approval
- Inevitably one entity will approve project prior to the other
- Requires early engagement of both entities as well as frequent communication and cooperation between all parties



Thank you for listening

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