

PROPOSED CHANGES TO NEIEN SCHEMA FOR BMPS USED AS OFFSETS OR TRADES

Watershed Technical Workgroup

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BMP TRACKING AND REPORTING

- Jurisdictions will be reporting additional information associated with BMPs that were used (e.g.: sold) for offsets or trades. The jurisdictions are expected to report the BMPs, not load reductions or credits, that were used as offsets or traded for the annual progress review.
- Scenario Builder and the Watershed Model will be run twice. The first time with all BMPs—those used for offsets or trades and those not. The second run will be without those BMPs used for offsets or trades. The load difference between the two runs are the pounds reduced that may be credited toward offsets or trades.
- It is not necessary for jurisdictions to report additional trading information for BMPs certified for use in a trade, but not sold or otherwise used.
- All of the NEIEN reporting elements are optional. They are not anticipated to be used unless a BMP is used for a trade or offset.

CREDIT CALCULATION TECHNICAL MEMORANDUM

PUBLISHED 5/14/2014

Credit Calculation Technic X

https://www.epa.gov/sites/production/files/2015-07/documents/creditcalculationtm_final_5_14_14.pdf

REPORTING CREDITS AS PART OF THE BAY TMDL AND ANNUAL PROGRESS REVIEW

Evaluation of each Bay jurisdiction's progress towards meeting the Bay TMDL is assessed on an annual basis. The Bay jurisdictions report all BMPs on an annual basis for this assessment. For purposes of this technical memorandum, a used credit is defined as an existing annual credit¹⁶ that has been traded or sold after being certified and generated through a CBP Partnership-approved BMP. An unused credit is one that has *not* been traded or sold within its one-year life, despite a load reduction having taken place.

As part of the annual assessment toward milestone and Watershed Implementation Plan (WIP) commitments, Bay jurisdictions should report all BMPs, indicating those that generated credits that were used as well as those that were unused. A jurisdiction may need to add additional fields to the information submitted as part of the annual assessment to report the following: whether the BMP was used for a trade or offset or went unused, the sector to which the load reduction was applied, the location¹⁷ at which the credit was generated, and the location at which the reduction should be credited (i.e., the locations of the buyer and the seller). Used credits can only be counted toward meeting WIP goals in the sector and location that purchased the credits, not the sector and location that created the credits. Unused credits may be counted toward meeting WIP goals *only* within the one year credit life of the unused credit, even if the certification period is greater than one year.

ANTICIPATED NEIEN REPORTING ELEMENTS *PRESENTED 11/18/2015 TO TRADING AND OFFSETS WORKGROUP AS PART OF DRAFT BASELINE TECHNICAL MEMORANDUM*

- Data elements in addition to the BMP information already reported
 - Used in trade (y/n)
 - Amount
 - Date range for traded BMP (begin, end)
 - Credit generator and buyer location—same geography options available now
 - Sector and location where reduction is applied
 - Permit number, if used for permit compliance
- The Watershed Technical Workgroup will need to approve these changes to the NEIEN Schema

NEXT STEPS

- Review proposed schema changes. Schema posted on Workgroup website.
- Comments due 4/22/2016 (two weeks).
- Comments will be addressed and approval requested at the 5/5/2016 Watershed Technical Workgroup meeting.