

## Chad Wiseman

- 1) How is avoidance and minimization accounted for in the NEB calculation? My assumption is that avoidance and minimization would enter into the impact side of the ledger, and would result in a corresponding reduction in offset requirements to attain NEB. This is standard mitigation sequencing, but it would be good to explicitly define what side of the ledger avoidance and minimization is accounted.
- 2) How does the certainty of stream flow benefits of an offset project affect its value? For example, the benefit of a surface water right acquisition is relatively certain, but a floodplain restoration project may have a less certain benefit.
- 3) Should there be minimum monitoring requirements to determine if the project is providing the intended benefits? Adaptive management in the event that the project is not functioning as intended?
- 4) Is advanced mitigation an applicable concept in the NEB evaluation? Or is the 20 year impact horizon so soon that it does not matter? Is there a prescribed timetable where the projects need to be implemented?
- 5) What happens if a project in an approved plan turns out to be infeasible during the implementation phase? What is the minimum level of project feasibility that must be demonstrated to be part of the NEB evaluation?