PROJECT REVIEW REPORT

This project review report includes findings raised during Verra's review of the project specified below. The VVB must address the findings before the project request can be considered for approval by Verra. The project review report will be made publicly available on the Verra Registry. Confidential information may be provided in separate attachments.

Project ID	1764
Project Name	Reforestation and Restoration of Degraded Mangrove Lands, Sustainable Livelihoods and Community Development in Myanmar
Review Type	Verification
Program(s)	VCS
Verification Period	15 June 2022 to 31 December 2023
Project Proponent	Worldview International Foundation
Methodology	AR-AM0014, Afforestation and reforestation of degraded mangrove habitats, v3.0
VVB	EcoLance Private Limited
Assessment Criteria	VCS Standard, v4.7
Date of First Issue	09 April 2025
Review Conclusion	Approved
Date of Final Issue	25 August 2025

FINDINGS

#	Finding Description	VVB Response	Status
1	**Forward Action Request (FAR) from previous verification is insufficiently addressed**		
	Issue 1. FAR 01 from the previous verification is insufficiently addressed as project eligibility against the VCS Standard ARR and WRC project categories was not assessed during this verification. 2. Section 3.2.2 of the MR describes changes to hydrology and drainage in the project area (PA). See Background. However, there is insufficient description of the modifications to the hydrology and drainage in the PA or demonstration that the changes do not negatively impact the hydrology of the PA and adjacent areas. Action Required 1. The VVB must assess project eligibility against the VCS WRC requirements. a. The VVB must ensure the project updates Section 3.2.2 of the MR to demonstrate that the changes in hydrology and drainage in the PA meet the requirements of the VCS Standard. b. The VVB must update the verification report (VR) to include an assessment of the project's WRC eligibility requirements. c. The VVB must update Section 3.2 of the VR to include an assessment of the project's changes to hydrology and drainage in the PA, including how they assessed and confirmed that the changes comply with VCS requirements.	**Round 1** VVB Response 1. In accordance with Section 3.2.5 of the VCS Standard v4.7, the project proponent is required to reassess the baseline every ten years for the duration of the project. As the current monitoring period (15 June 2022 to 31 December 2023) falls within the original ten-year baseline validity period—given that the project commenced on 15 May 2015—the baseline reassessment is not yet due. The project proponent will undertake the baseline reassessment at the conclusion of this ten-year period, during a subsequent verification cycle. For the same FAR 2 is already raised. a. The section 3.2.2 of the MR has been updated to provide more details on the changes in the hydrology and drainage. b. As per the clarifications provided by VERRA, this is not necessary to request at this stage, as it pertains to the definition of the project area, which remains unchanged. c. Section 3.2 of the verification report is updated. Note that restoration and planting activities in the project areas were conducted within tidal inundation areas, with planted species depending entirely on natural hydrological cycles. No artificial water inputs or silvicultural interventions altering the hydrology have been undertaken. To comply with Sections 3.11.4(5) and 3.11.5 of the VCS Standard v4.7, a hydrological assessment was conducted by a modelling expert from WIF. This assessment examined hydrological connectivity and potential impacts on adjacent non-project areas. The analysis utilized a range of remote sensing and geospatial datasets, including: • Planet-NICFI monthly imagery (4.7 m resolution)	Closed

	Program Rule(s) *VCS Standard, v4.7*, Sections 3.2.13, 3.11.4 (5), 3.11.5 Background Issue 1 FAR 01 from verification 5 includes two actions: 1. The project falls under ARR and WRC categories and therefore project eligibility against the VCS Standard ARR and WRC project categories shall be assessed in subsequent verifications. - This action must be demonstrated in this verification. The project must demonstrate how it meets all WRC requirements per the VCS Standard. 2. VVB in the next verifications must ensure that the project reassesses its baseline every ten years, in line with Section 3.2.7 of the VCS Standard v4.3 requirements. At baseline reassessment, the project must demonstrate how it adheres to ARR and WRC project category requirements. This action in the FAR will only apply at the time of baseline reassessment. Issue 2 MR, Section 3.2.2: "....improving better hydrology and drainage system in the waterlogged areas while considering the suitable species to be with gap planting"	• SRTM DEM (30 m resolution) • Sentinel-1 and Sentinel-2 imagery (10 m resolution) • HydroSHEDS basin and river data • CHIRPS daily precipitation data • MODIS MCD12Q1 (IGBP land cover data, 500 m resolution) • OpenLandMap soil texture data (30 m resolution) The data were processed using Google Earth Engine and ESRI ArcGIS platforms to provide a preliminary yet robust analysis of potential project-induced hydrological changes, including impacts on water flow, quality, and availability. The assessment concluded that the project does not disrupt or impede natural water flow or alter hydrological connectivity within or between project and adjacent areas. A detailed technical report provided by the PP was assessed and detailed in section 3.2 and 4.2.8 of the verification report. Moreover, the verification team has raised FAR on the following: The project proponent (PP) has undertaken remedial measures to address waterlogging by improving hydrology and drainage systems and replanting with appropriate species across an affected area of 10.76 ha. Although these interventions aim to enhance site conditions, the PP has confirmed that these areas will be excluded from future Verified Carbon Unit (VCU) calculations, while remaining within the project boundary for conservation purposes. Furthermore, the VVB inquired whether any hydrological or drainage modifications within the project area could potentially impact adjacent lands. As confirmed by the PP, no such alterations have been made to date. The same was confirmed during the site visit too. However, in the event of any future hydrological interventions, these shall be assessed and reported during the next verification period, as such considerations are not currently addressed in the Monitoring Plan (MP). Accordingly, a Forward Action Request (FAR 1) has been raised to ensure this is reviewed in subsequent verifications.	
		Verra Response	

		Section 3.2.2 of the MR and Section 3.2 of the VR have been updated to include additional information on the hydrological conditions and drainage in the project area. No further action is required, and the finding is closed.	

2	Insufficient demonstration of monitoring project area excluded in this monitoring period		
	Issue *1.* Section 3.2.2 of the MR reports that the project area is reduced (from 2,065.87 ha to 2060.72 ha) in this monitoring period. However, a. It is unclear if the project will continue to monitor the excluded area, per the requirements of the *VCS Standard.* b. The updated KML showing the revised project area and project accounting area has not been submitted. Action Required 1. The VVB must ensure the project *a.* Updates Section 3.2.2 and/or Section 3.1 of the MR to demonstrate how the project complies with Section 3.2.18 of the *VCS Standard.* b. Submits an updated KML file consistent with the revised project area (PA). Program Rule(s) *VCS Standard, v4.7,* Section 3.11.2, 3.2.18	**Round 1** VVB Response 1a. During the 5th verification period, the total project boundary encompassed 2,065.87 hectares. In the current monitoring period, minor boundary modifications have been implemented, resulting in a revised delineated project area of 2,060.72 hectares. As part of these changes, 5.15 hectares have been permanently excluded from the project boundary and will not be included in monitoring or verification activities in any future periods. This adjustment has been made in compliance with Section 3.2.18 of the VCS Standard v4.7, which requires that previously issued Verified Carbon Units (VCUs) be discounted if corresponding areas are removed from the VCU accounting boundary. In addition, 10.76 hectares—comprising waterlogged zones with mangrove vegetation and areas under supplementary gap planting—have been conservatively excluded from VCU accounting for this monitoring period, even though they remain within the project boundary for conservation purposes. These areas will continue to be excluded from VCU calculations in all future monitoring periods. As a result, the net VCU accounting area for the current monitoring period is 2,049.96 hectares. To ensure conservative and accurate accounting, the total Emission Reductions Removals (ERRs) previously issued from the 1st to the 5th monitoring periods, amounting to 1,780 tCO_2e, have been fully discounted in this verification period, as per Section 3.2.18 of the VCS Standard v4.7. This adjustment has been	Closed

		reflected in Section 5.4 of the Monitoring Report and also updated in section 3.2 of the VR. Accordingly, after applying this deduction, the remaining verified emission reductions for this monitoring period amount to 78,086 tCO_2e. This approach upholds the conservative principle of carbon accounting and ensures alignment with all applicable VCS rules and guidance. 1b. Revised KML files representing both the updated project boundary and the current VCU accounting area have been submitted in compliance with Section 3.11.2 of the VCS Standard v4.7.	
		Verra Response The project has provided a calculation sheet demonstrating that VCUs claimed in the previous 5 verification events for the excluded areas have been calculated. This is deducted from the VCUs in the current monitoring period. No further action is required, and the finding is closed.	

3	Insufficient demonstration of monitoring of pre-existing trees		
	Issue 1. It is unclear how the project differentiates between project trees and the baseline trees, especially in strata under restoration, which have pre-project vegetation. While the PD states that exiting trees are recorded, the VVB does not a. Sufficiently describe how they verified that the pre-project trees are recorded by the project; b. Describe how they verified that the project differentiates between project and pre-project trees, and how this is consistent with the ERRs reported in this monitoring period;	**Round 1** VVB Response 1. a. To ensure clear differentiation between pre-existing mangrove trees and those planted under the project, all existing mangrove trees within each sample plot are distinctly marked with coloured paint at breast height (130 cm above ground level). This facilitates accurate identification during monitoring. Additionally, project-planted trees are tagged with numbered labels for traceability. The pre-projects trees are recorded in the inventory reports. b. To distinguish between project and pre-project trees within permanent sample plots, two methods are applied: 1. Tree tagging for planted trees, and 2. painting existing trees at breast height. The tags on planted trees are easily identifiable,	Closed

	c. Demonstrate how the executed monitoring plan complies with points 11 b and c of the AR-TOOL 14. Action Required 1. The VVB must update Section 4.3 of the VR to: a. Describe how they confirmed that the pre-project trees are recorded. b. Describe how they confirmed that the project differentiated between project and pre-project trees during monitoring and demonstrate that this is reflected in the ERRs estimations. c. Describe how they verified that pre-project trees have not suffered mortality because of competition from trees planted in the project or damage because of implementation of the project activity during this monitoring period. 2. The VVB must ensure that the project updates Sections 4.3 and 5.1 of the MR as needed. Program Rule(s) *AR-TOOL 14, v4.2,* Section 5, point 11.	and if any tags are damaged or lost, they are promptly replaced by the patrolling staff. The diameter at breast height (DBH) and height measurements of the planted trees are recorded, and estimated emission reductions (ERRs) for the respective monitoring period are calculated based on these variables which was confirmed by the verification team during the field measurement crosschecks. c. For the restoration efforts, the planting density in degraded areas was approximately 2,000 plants per hectare, ensuring adequate space for existing trees to grow without competition. Therefore, the pre-project trees did not experience mortality due to competition from planted trees throughout the monitoring period. Conservation and restoration activities have improved the overall condition of the mangrove ecosystem without causing any harm to the existing vegetation. This was confirmed through field measurements of tree growth, and survival counts in permanent sample plots. Furthermore, the existing trees are not accounted for in carbon stock calculations but are allowed to grow naturally and are monitored throughout the crediting period. As a result, the project has adhered to the requirements outlined in Section 5, Points 11(b) and (c) of the AR-TOOL 14 during this monitoring period. Verra Response Section 4.3 of the VR has been updated to explain how the VVB assessed that the project differentiated between project and pre-project trees during monitoring and how the VVB verified that pre-project trees have not suffered mortality because of competition from trees planted in the project or damage because of implementation of the project activity during this monitoring period. No further action is required, and the finding is closed.	

4	**Insufficient demonstration of allometric equation used in ex-post calculations**

	Issue 1. The project does not sufficiently demonstrate the appropriateness of the allometric equations used by the project for ex-post calculations per the tool, AR-AM TOOL 17. The equation used was developed for 6-7-year-old mangroves (see MR, Section 5.2); however, the project's plantations are older than 7 years. This suggests the allometric equation is not appropriate. Action Required 1. The VVB must ensure the project updates Sections 5.2 and/or 4.3 of the MR to demonstrate the appropriateness of the equations used for ex-post calculations per the requirements of AR-AMTOOL 17, v.1. If necessary, a new equation must be selected. 2. The VVB must assess the appropriateness of the allometric equation used for this monitoring period. Program Rule(s) *AR-AMTOOL 17, v1.0*	**Round 1** VVB Response 1. To demonstrate the appropriateness of the allometric equations used for ex-post calculations, the AR-AM TOOL 17 was applied. As established in standard forestry and carbon accounting practices, allometric equations are developed based on directly measurable parameters such as Diameter at Breast Height (DBH) and tree height (H)—not the age of the plantation. Using age alone as a basis for applying or disqualifying an allometric model is methodologically incorrect and scientifically unsupported. To substantiate the selected equation used in the proposed project, we refer to the study by Thant et al. (2012), which derived the allometric model using sample trees with DBH ranging from 1.7 cm to 12.1 cm and heights between 3.8 m and 9 m. Therefore, the model remains valid as long as the DBH of the planted trees in the project area remains within or reasonably close to the upper range of the calibration, even beyond a specific plantation age (e.g., 7 years). We believe with the current DBH and H recorded, the equation can be used until 10 years or more. Furthermore, as the project approaches the 10-year reassessment period (starting from May 15, 2015), a comprehensive review will be undertaken. At that time, the selection and application of updated or more representative allometric equations will be reassessed and incorporated as necessary in subsequent verifications. This is duly reflected in Section 5.2 of the updated Monitoring Report. 2. Section 4.3 of the VR is updated to justify the appropriateness of the equations used. Verra Response Section 4.3 of the VR has been updated to assess the appropriateness of the equations used. No further action is required, and the finding is closed.	Closed

5	Insufficient description of implementation status of project activities		
	Issue 1. Section 3.1 of the MR does not sufficiently describe the implementation status of the activity "Mobilization of trained forest rangers and patrol teams targeted on main access points." This is related to the applied PD deviation, where part of the project area was subject to illegal landfilling. 2. It is unclear if illegal exploitation of the project area, including illegal logging, encroachment, and forest clearance with fire were observed in this monitoring period. 3. Section 3.1 of the MR does not sufficiently describe how the non-permanence risks have been monitored in this monitoring period. Action Required 1. The VVB must ensure the project updates Section 3.1 of the MR to address the points raised in Issues 1-3. 2. The VVB must update the VR accordingly. Program Rule(s) *VCS Monitoring Report Template, v4.4,* Section 3.1	**Round 1** VVB Response 1. As mentioned in Finding No. 2, the previous project boundary was 2,065.87 ha, but during this monitoring period, the updated boundary has been slightly adjusted to 2,060.72 ha. The root cause was attributed to insufficient or ambiguous boundary demarcation, which resulted in a lack of clarity among local communities and external parties regarding the defined project boundaries. In response, the Project Proponent implemented a series of corrective and preventive measures to mitigate this risk. Specifically, 40 permanent concrete boundary pillars were installed along the affected perimeter to establish a clear and visible delineation. These markers are subject to routine inspection and maintenance by community-appointed forest guards. Furthermore, prominent notification signboards have been strategically placed between the project area and adjacent community lands to raise awareness and minimize the risk of future boundary infringements. These actions collectively demonstrate the PP's commitment to risk management and safeguarding the project area from further encroachment. Section 3.1 of the MR is updated. 2. As discussed above there was an encroachment of 5.15 ha in the current MP. The causes of this encroachment and action taken and measures put in place are discussed in the above point. No illegal logging, clearance with fire reported or noticed in the current MP. 3. In the INTERNAL RISK section of the AFOLU Non-Permanence Risk Tool v4.2 (NPRT), it is stated that "Ongoing enforcement to prevent encroachment by	Closed

		outside actors is required to protect more than 50 percent of stocks on which GHG credits have previously been issued." To address this, WIF collaborates with Forest Department officials to ensure regular monitoring of the area and prevent encroachment. Agreements with local village tracts also ensure that sufficient staff are available to care for the plants. Considering the nature and recurrence potential of this risk, it has been conservatively scored as "high," with a risk rating of 2 in the non-permanence risk assessment. Accordingly, Section 3.1 of the MR has been updated with this information. Section 4.5 of the verification report is updated.	
		Verra Response Section 3.1 of the MR has been updated to include additional information on the project activities in this MP. Section 4.5 of the VR has been updated to include additional assessment on the project's project management risk, specifically the risk related to encroachment. No further action is required, and the finding is closed.	

6	Insufficient demonstration of project longevity		
	Issue 1. Project longevity is demonstrated through the MoU between the project proponent (PP) and the Forest Department, for a period of 100 years. Further, the project has a monitoring and management plan for 100 years. However, the project does not sufficiently demonstrate the permanence of the project stocks. Specifically, a. It is unclear if the monitoring and management plan includes measures to	**Round 1** VVB Response 1a. The Project Proponent (PP) has established a comprehensive and institutionalized **monitoring and management framework** that ensures the continuity of protection activities for carbon stocks throughout the entire 100-year longevity period of the project. Key measures include: 1. Dedicated Forest Management and Protection Team To ensure effective protection, community forest guards have been assigned to patrol and protect the project areas regularly, in	Closed

	prevent illegal activities (e.g., illegal logging/charcoal production) and encroachment over the entire 100-year longevity period, considering that ongoing enforcement is required to prevent encroachment, and, b. How the project will ensure the permanence of SOC stocks over the project longevity period. Action Required 1. The VVB must ensure the project updates the NPRR (Notes) to a. Describe the monitoring and management plan in sufficient detail to demonstrate that activities to protect carbons tocks will continue over the entire project longevity period. b. Demonstrate that the permanence of SOC stocks over the project longevity period will be maintained by demonstrating that project areas are not subject to erosion, migration, or inundation. 2. The VVB must update Section 4.5 of the VR accordingly. Program Rule(s) *AFOLU Non-Permanence Rick Tool, v4.2,* *VCS Standard, v4.7,* Section 3.2.13	coordination with the village development committee and Forest Department staff. 2. Illegal activity risk management To prevent illegal logging and charcoal production, the project offers alternative livelihood opportunities for the local community. These include seasonal mangrove seed collection, employment as community forest guards, boatmen, nursery workers, and cash-for-work activities. The project also supports seaweed and mushroom cultivation, and provides fishing nets and crab traps to help generate family income. 3. Legal Protection & Institutional Agreements: Project areas (Magyi, Thabawkan, and Thaegon) fall under the designation of Protected Public Forests (PPFs) and are safeguarded in compliance with Myanmar's Forest Law and relevant regulations. According to Section 41 (e) of the Forest Law (2018) Long term agreement with communities. 4. Communities involvement in protection and benefit sharing. Local communities are actively engaged through employment, awareness, benefit-sharing mechanisms, and co-management roles. This incentivizes local protection and discourages illegal activities. 5. Clear Boundary Demarcation & Signage Project boundaries are permanently marked using durable concrete pillars and visible signage to prevent unintentional encroachment. Maps and GPS coordinates of boundaries are maintained and updated periodically. 6. 100-year management and financial plan. The project also includes a comprehensive 100-year management, financial, and monitoring plan to ensure long-term sustainability. Accordingly, Section 1.4 Project Longevity Q4 of the Non-Permanence Risk Report has been updated to reflect this.	

		b. According to Section 3.2.13 of VCS Standard v4.7, WRC projects must ensure the permanence of soil carbon stocks by demonstrating that project areas are not vulnerable to erosion, migration, or inundation. Additionally, since this project is a WRC project type, the impact of anticipated sea level rise on wetland migration must also be considered, as outlined in Section 3.11.4 Clause 5 of VCS Standard v4.7. Mangrove roots play a crucial role in enhancing sediment accumulation and retaining nutrients, making mangrove conservation and restoration essential for the long-term stability of soil organic carbon (SOC) stocks. These activities do not negatively impact the project soils but rather help ensure the permanence of SOC stocks over time. Based on the global tidal range map (https://wif.maps.arcgis.com/apps/mapviewer/index.html), the tidal range within the project boundary falls within the meso-tidal range (2-4 m), meaning it is unlikely to be submerged due to sea level rise throughout the project's timeline. Furthermore, a technical assessment conducted using the SimCLIM AR6 Tool indicates that the project area is not expected to experience significant sea level rise under either low greenhouse gas emission scenarios (SSP1-1.9) or high emission scenarios (SSP5-8.5) by the year 2100 (see reference). This analysis confirms that the project areas are not at risk of coastal erosion due to sea level rise, ensuring the permanence of SOC stocks throughout the project's duration. In addition to this Universal Soil Loss Equation (USLE model) assessment conducted by the WIF /99/ shows the project area is located in a low-erosion risk zone within a range of 0- 0.05. 2. Section 4.3 and 4.5 of the VR is updated.	
		Verra Response	

		Sections 4.3 and 4.5 of the VR have been updated to include additional assessment of the project's monitoring and management plan. No further action is required, and the finding is closed.	

7	Insufficient evidence of legal right to control and operate project activities		
	Issue Section 2 of the NPRR states that "*WIF has executed legal binding agreements with the communities securing the legal rights to control and operate project activities over the entire project area (Annex 9),"* and "*WIF has been granted land use permissions from the regional government (Regional Forest Department).*" However, Section 1.12.1 of the PD states that both communities and Pathein University have land leased for the project. Therefore, the following elements related to ownership are unclear: a. If the lease terms are sufficient for communities to transfer legal rights to control and operate project activities to WIF through legal agreements between communities and WIF, and demonstrate that WIF, given that the land is government-owned. b. How Pathein University's rights are considered legal and how these rights are transferred to WIF, given that Pathein University has leased part of the project area (PD, Section 1.12.1). i. The project documentation (e.g., PD) indicates there is no legal agreement between WIF and the University, only an MoU. Therefore, it is unclear how WIF demonstrates legal rights for the land leased by the University. ii. If part of the land is leased by the University, it is unclear if the lease terms are sufficient for the University to transfer legal rights to control	**Round 1** VVB Response a. WIF has obtained legal land use permissions from the Regional Forest Department to undertake mangrove conservation and restoration, as documented in official letters dated 17/05/2017 and 18/05/2017. The permission authorizes the establishment of community-based mangrove plantations on degraded mangrove lands for a 30-year initial term, extendable up to 120 years, consistent with Sections 3.7.1 (1) and (6) of the VCS Standard v4.7. As per Section 3 of the Community Forestry Instructions (CFI) 2019, community forests may be created within protected public forests upon government approval. The lands are handed over to the village tract mangrove conservation committee for the initial 30 years, with a renewable term of 30 years each, as specified in Chapter 8, Section 13 of the CFI, which was also confirmed from the permission letters from the forest department referred above. It is important highlight that while communities do not own the land, they have specific rights to use the land within the PPFs as provided by the Forest Law (2018). To respect and formalize access rights of local stakeholders within the Protected Public Forest (PPF), the PP has signed legally binding agreements with local communities for a 60-year period, renewable in 30-year increments. These agreements are aligned with Sections 13 and 14(a) of the CFI 2019. it is to be noted that other than the MoU between PP and PU, a	Closed

	and operate project activities to WIF. c. How the VVB has assessed the validity of the ownership demonstration and the Land Tenure risk score. Action Required The VVB must ensure that the NPRR is revised to clarify the legal agreements that secure WIF's legal right to control and operate project activities over the entire project area with all entities that have verified ownership claims or verified land, resource access, or use rights. Section 2.1.1 of the MR must be revised as needed. a. The VVB must describe how they have assessed the legality of the project ownership claim. b. Documented evidence of land leasing with the communities and the university must be submitted for review. The VVB must confirm the validity of this evidence. Program Rule(s) *AFOLU Non-Permanence Risk Tool, v4.2,* Section 3.2.1 (2 and 6) *VCS Standard, v4.7,* Section 3.7 Background VCS Standard, Section 3.7: Project and jurisdictional **proponents must demonstrate that they have the legal right** to control and operate project or program activities.	tripartite legally binding agreement among WIF, Pathein University, and Magyi communities was signed dated 17/03/2024, which supports project implementation in the Magyi area. As per Clause 3, Both the Magyi Village Tract Administration Committee and Pathein University have granted WIF the rights to operate the carbon project. The agreement is archived in Annex 12 (1764_Magyi VT Agreement (MMR_ENG) RS.pdf). ii) Please refer the justification provided above. Section 2.1.1 of the Monitoring Report (MR), along with Sections 1.4 and 2.1 of the Non-Permanence Risk Report (NPRR), has been updated to clearly demonstrate that WIF holds the legal authority to control and implement project activities across the entire project area. b. Tri partite agreement between PP, PU and community is submitted for review. While local stakeholders do not own the land, they have specific rights to use the land within the PPFs as provided by the Forest Law (2018). Moreover, Section 14 (a)(i) of the Forest Rules (1995) states that if there are customary lands traditionally used by local communities within the proposed PPF areas, the boundaries of the PPF should be delineated excluding those lands where traditional land use rights exist. Verra Response The project has provided documents to demonstrate that (i) The project area is under the control of Pathein University (Magyi) and the VTECCs (Thabowkan and Thaegon). (ii) There are agreements between the VTECCs (Thabowkan and Thaekone) and the PP, or between the Pathein University, VTECC (Magyi) and WIF providing the PP with the legal right to operate and monitor the project.	

		No further action is required, and the finding is closed.	