



VERIFICATION REPORT
VERIFICATION OF THE BRUSHY MOUNTAIN IFM PROJECT
RP8
(CAR1095/CAFR5096)

03/04/2022
Version 2.0

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Abbreviations

ARB	Air Resources Board
APD	Authorized Project Designee
ANSI	American National Standards Institute
BMP	Best Management Practices
CAR	Climate Action Reserve
CH ₄	Methane
CO ₂ e	Carbon Dioxide Equivalent
CP	Common Practice
EPA	Environmental Protection Agency
ERTs	Emission Reduction Tons
FOP	Forest Offset Protocol
GHG	Greenhouse Gas
HWP	Harvested Wood Products
HWPCW	Harvested Wood Products Calculation Worksheet
ICS	Initial Carbon Stocks
MBL	Minimum Baseline
NPV	Net Present Value
NRCS	USDA Natural Resource Conservation Service
OMM	Offset Material Misstatement
OP	Offset Provider
OPO	Offset Project Operator
OPDR	Offset Project Data Report
PDM	Prior to Delivery to Mill
RPF	Registered Professional Forester
S&A	S&A Carbon
t	Metric Tonnes
U.S.A	United States of America
USDA	United States Department of Agriculture

1 Introduction

S&A Carbon (S&A) has been asked by Jim Clark, of North Coast Resource Management (NCRM) to verify the emission reductions generated by the Brushy Mountain IFM (the Project) for its eighth reporting period. The verification process is required by the California Air Resources Board (ARB) Compliance Offset Protocol (COP) for U.S. Forest Protocol (October 11, 2011) and Title 17, California Code of Regulations, Article 5. S&A verification activities began 12/9/2021. This report presents the findings from the verification the project's greenhouse gas (GHG) emission reductions/enhancements.

The Offset Project Registry (OPR) for this project is the Climate Action Reserve (CAR) listed as CAR1095/CAFR5096.

2 Project Overview

2.1 Description of project

The Project is an IFM project, consisting of 16,412.83 acres of forestland in the state of California. There is a long history of human occupation and use within the Project Area. Homesteading began in the mid-1800's and small ranches in the area raised pigs, sheep, horses, and cows. Clearings on the landscape that were flat to gently sloped were planted to annual grains or pasture for forage and hay. Fruit trees and small gardens were common near homesteads. Early in its history the region was grazed and timber harvested. Roads and fences and a few foundations are evidence of this agrarian past. Some of the worn fences have been replaced, and some wagon roads updated to graded gravel roads that meander about the property. Modern timber harvesting operations on the project area began in the 1930's and continued intermittently throughout the 1990's. No timber has been harvested since 1998.

The Forest Owners intend to allow conifer and hardwood stocking levels to develop in the project area in excess of those defined by the baseline analysis which project carbon stocks levels over time following a harvest scenario which implements the minimum requirements of the California Forest Practice Rules as well as other financial and legal constraints. When timber harvesting is initiated in the project area, the Forest Owners intend to balance harvest with growth such that conifer board foot volume is maintained or increased over time, excepting those portions of the project area which may in the future experience a significant disturbance.

This is an annual desk review of the Project's eight reporting period.

Offset Project Commencement Date: 1/17/2014

Verification Start Date: 10/14/2021

Reporting Period Start Date: 10/1/2020

Reporting Period End Date: 9/30/2021

2.2 Offset Verification Services Scope and Criteria

The scope of the verification is to assess the Project's conformance with the ARB US Forest Projects (COP) and other references cited below for the reporting period. This is an annual, less intensive desk verification, and will thus not require a site visit, as per section 10.2.3 of the COP. This verification will include an assessment of the project's conformance with the standard criteria. The verification

will assess the project with respect to the baseline scenarios presented in the Offset Project Data Report (OPDR).

Specific verification tasks include:

- Verifying that actual monitoring systems and procedures are in compliance with Compliance Offset Protocol;
- Evaluating the GHG emission reduction/enhancement data and express a conclusion with a reasonable level of assurance about whether the reported GHG emissions reduction/enhancement data is free from offset material misstatement of asserted emission reductions/enhancements; and
- Verifying that reported GHG emissions data is sufficiently supported by evidence.
- To verify the project in accordance with the verification guidelines outlined in the Regulation and the COP,

The criteria for the offset verification services are:

- Title 17, California Code of Regulations, Article 5, Subchapter 10, Sections 95800 to 96022 (Regulation), April 1, 2019
- The ARB methodology entitles, "Compliance Offset Protocol U.S. Forest Projects" (COP), October 11, 2011
- The ARB "Guidance for Verifying Forest Carbon Inventories", September 9, 2013
- The ARB "ARB Compliance Offset Program, U.S. Forest Offset Protocol, Frequently Asked Questions", October 2013
- The ARB "Technical Guidance for Offset Verifiers: Verification of Offset Project Data Reports", October 2013

2.3 Verification Objective

The purpose of this report is to document the verification process and to assess the Project's conformance with the ARB criteria listed above. The Offset Project Operator (OPO) for this project is Coastal Forestlands, LTD, a California Limited Partnership. Jim Clark, of NCRM, hereafter referred to as the Authorized Project Designee (APD), provided project development support to the OPO.

2.4 Materiality

The verification team must state with reasonable assurance that the percent overstatement of the OPO/APD's total reported GHG emission reductions and removal enhancements are no more than a 5.00% overstatement of the "true" GHG emission reductions and removal enhancements, as calculated by the verifier using the equation below (§95977.1(b)(3)(Q)). The analysis must consider all discrepancies, omissions, or misreporting, for the subset of data included in the data checks.

$$\text{Percent error} = \frac{[\sum \text{Discrepancies} + \sum \text{Omissions} + \sum \text{Misreporting}] \times 100\%}{\text{Total Reported Emission Reductions and Removal Enhancements}}$$

2.5 Level of Assurance

The verification was conducted to provide a reasonable level of assurance of conformance against the defined verification criteria within the verification scope.

2.6 Findings

Throughout the verification, findings were recorded by the verification team as per verification guidance outlined in the ARB COP for US Forest Projects and supporting documents cited above. Any discrepancies, omissions, or misreporting identified by the verification team were documented in the Issue Log (per §95977.1(b)(3)(O)). The Issues Log was submitted to the OPO on 1/10/2022. Prior to completion of the verification, all identified non-conformances were required to be addressed, and correctable errors were required to be fixed. The OPO submitted additional evidence for S&A's evaluation for conformance on 11/18/2020. The OPO corrected all correctable issues. The Issue Log and the Verification Report are shared with the OPO, the S&A verification team, and CAR.

Please note, throughout the report reference numbers have been assigned to the various verification documents. These include both those prepared by the OPO and the S&A verification team. Specific details regarding document delivery dates, general descriptions and associated file names are found in Appendix A of this report. Some of these documents may be revised during the verification; only the final versions are listed in Appendix A.

3 Summary of Reporting Period ROC's

During the verification process, the S&A verification team gathered evidence to evaluate the project design, the project implementation, and assess the accuracy of the GHG assertion associated with the reporting period.

After review of all project information, procedures, calculations, and supporting documentation, S&A confirms that Project reporting is accurate and consistent with all criteria and requirements in the COP and Regulation. S&A confirms all verification activities, including objectives, scope and criteria, level of assurance, and project documentation adhere to the ARB COP for US Forest Projects (October 11, 2011). S&A concludes without any qualifications or limiting conditions that the Project (CAR1095/CAFR5096) meets the requirements of the ARB COP and Regulation.

S&A has verified the OPO's GHG assertion of 107,382 tCO₂e for the Reporting Period of 10/1/2020 – 9/30/2021.

	Total ROCs (Q _{ry}) (tCO ₂ e)	Total ROCs to Buffer Pool (tCO ₂ e)	ROCs net (Q _{ry after buffer}) (tCO ₂ e)
Total for RP8	107,382	20,656	86,726

4 Verification Methodology

4.1 Verification Team

Role	Name
Lead Verifier	Lawson Henderson
Independent Reviewer/Approver	Kyle Silon
Biometrician	Elizabeth McGarrigle
RPF	Thomas Blair (#2607)
Project Manager	Alexa Kandar

4.2 Description of the Verification Process

S&A submitted a proposal to NCRM for the ARB verification of the Project on 5/27/2021. NCRM selected S&A as the Verification Body. Notice of Verification Services and Conflict of Interest (NOVS/COI) forms were initially filed with the OPR (CAR) and ARB on 11/4/2021. The COI form was subsequently approved on 11/17/2021. Verification activities began on 11/17/2021. The verifiers reviewed the Listing document and confirm that it is complete and accurate meeting the requirements of §95975.

A kickoff conference call was held on 12/9/2021. The project team and verifiers discussed initial findings from a desk review of submitted documents, targeting aspects of the OPDR that might affect the verification. After the kickoff meeting, meeting minutes were prepared.

The verifiers assessed the eligibility criteria required to design, measure, and monitor the Project to the requirements of the Forest Offset Protocol and Regulation (See §95977.1(b)(3)(D)(1), §95977.1(b)(3)(D)(2)(a)-(e), and §95977.1(b)(3)(D)(2)(f)-(i)). Verifiers confirmed that these eligibility requirements were met and completed the Verification Plan.

A draft Sampling Plan was prepared based on information available from the APD. The Sampling Plan considers the requirements of §95977.1(b)(3)(G)(1)) and evaluates the credibility and rigor of six methodology items. It considers the size (both in area and carbon storage) of the GHG reservoirs (forest strata) and discusses the risk associated with each. Since this is an annual desk verification, the emphasis was placed on the following items, in compliance with the annual verification checklist included in the protocol:

- Any changes in the status of the Forest Owner including, if applicable per Section 3.8.1 of the COP, and the acquisition of new forest landholdings
- Checks on whether Forest Project and associated Project Lands have met and followed all local, state, or federal regulatory requirements during the reporting period.
- Estimates of Actual Onsite Carbon Stocks
 - o A detailed review of any changes in reported carbon stocks from previous years are within expected bounds resulting from reported harvest, growth, and disturbance effects.
- Project Reversals
 - o If a reversal has occurred during the previous reporting period, the report must include a written description and explanation of the reversal, whether the reversal has been classified as intentional or unintentional, and the status of compensation for the reversal.
- Baseline stocks, IFM-1 and IFM-3
 - o A thorough Baseline review was required for the initial verification, but since this is an annual desk review of the fifth reporting period, the degree of baseline review is reduced. Verifiers traced data from the OPDR back to the results of the baseline modeling and did a general review of the baseline modeling process. The level of review was augmented if any issues surface in the process.
- Emission Reductions
 - o Verifying emission reductions included tracking all components of any OPO-submitted emission reduction calculation worksheet, including:

- Checks that the entries for boRP stocks, confidence deduction, baseline stocks, baseline and harvested wood products, and the reversal risk are all entered correctly from their computed sources.
 - The accuracy of these sources was confirmed.
 - Checks that calculations within the worksheet were correct.
- Harvested Wood Products (HWP), IFM-7, IFM-8, IFM-17 (following guidance in COP Appendix C.)
 - Project harvesting did not occur during this monitoring period and baseline harvested wood estimates are outside the scope of this verification; however, basic data checks for correct calculations on baseline HWP were performed.
- Biological emissions from site prep and project leakage
 - The verifier confirmed the use or lack of site preparation activities.
- Secondary Effects
 - The verifiers checked that calculation steps and/or factors provided in Section 6 and approved at the time of the offset project listing, were utilized correctly during the monitoring period.

As required by §95077.1(b)(3)(K), the Sampling Plan will be retained by S&A for a period of not less than 15 years following the submission of the Offset Verification Statement. All material received, reviewed, and generated by the provision of Offset Verification Services will be retained by S&A for the same period.

The verification process included exchanges between S&A and the APD, to gather additional information for review and examination. These exchanges included one round of an Issues Log by S&A to which the APD was required to respond. The final APD responses to these issues were provided to the verifier on 01/18/2022. The Issues Log is a confidential document, available under separate cover. With responses to the issues as well as supplementary information, S&A was able to close all issues and render a positive verification opinion. Verifiers confirmed in an email dated 01/19/2022 to the APD that all issues were satisfied in the responses to the Issues Log.

S&A auditors drafted the Verification Statement and Verification Report and presented it for Independent Review, which determined the Verification Statement to be justified based on the project documentation and verification assessment. A closing call was held with the APD on 1/25/2022. The Verification Report and Verification Statement were then presented to the APD for review and comment. Upon approval from the APD, S&A uploaded the Verification Report and Verification Statement to the OPR website for registry review.

5 Verification Findings

Please note, non-conformances or observations identified during the verification are included in the Issues Log. All findings related to the verification team's review of evidence submitted by the APD are included within this verification report and the final Issues Log /V4/. Data checks for many items are available in the verifiers' data check log /V2/.

5.1 Project Eligibility and GHG Assessment Boundary

COP § 2.1.2, 2.2

S&A can confirm that no changes have occurred to project eligibility and ownership since the last verification. The project is still an Improved Forest Management project that takes place on 16,412

forested acres near the town of Willits (Mendocino County), California, where Coastal Forestlands continues to act as the OPO for the project and Jim Clark of NCRM continues to act as the APD.

The verifiers confirmed the land is privately owned by both Coastal Forestlands, Ltd (13,733 acres) and Richard Padula (2,680 acres), based on reviewing the project Deeds, the Summer Camp Conservation Easement, GIS project area and historical shape files, and reviewing available on-line publicly available spatial data /R6/. Verifiers also georeferenced the project area shapefile with PLSS spatial data to assess the accuracy of the GIS project boundary. Verifiers confirmed that the project area correlates reasonably well with the delineated GIS project boundary.

The APD informed the verifiers that Mr. Padula had unfortunately passed away during the reporting period. Based on the discussion with the APD, it is the verifier's understanding that although Mr. Padula passed away, it did not result in a change in forest ownership as his portion of the project area was held under a trust entity ("Padula Trust"). Communications with the APD gave the verifier's reasonable assurance that while Mr. Padula has passed away, there was not a change in forest ownership as the "Padula Trust" remains in place, and Coastal Forestlands, Ltd. Remains the OPO.

According to the project listing, the Project is not mandated by any law, statute, or regulation, and verifiers found no evidence to the contrary during this monitoring period.

The forest types are native to the area and are comprised of multiple ages and mixed species. No commercial timber harvesting is currently taking place on the property. The OPO continues to attest in the most recent annual OPDR that no broadcast fertilization has been or is being employed, and verifiers found no evidence to the contrary /R1/.

Sources used by the verifiers to assess the percentage of tree canopy included reviewing the latest, publicly available aerial imagery and project documents (maps and geospatial data). Imagery used by verifiers is comparable to a map submitted by the OPO as Attachment F of the listing documents. During the previous reporting period (RP7) a fire impacted under 2% of the project and primarily burned the understory but was found to not affect adherence to the canopy cover requirements. As confirmed through discussions with the APD, no natural disturbances impacted the project area over the course of RP8.

The APD attested that all project documentation and reports that reference carbon stocks have been reviewed by a Professional Forester, in this case, the APD (Jim Clark), who is a CA RPF (RPF# 2528). Verifiers confirmed the good standing of this individual's certification though a check of Certified Foresters on the Government of California Forestry/Fire Protection website

The verifiers confirmed that the attestations required under Reg §95990(H)(6)(A) have been made in the project listing document (Part XI).

Verifiers uncovered no evidence that this project has been listed as a Forest Project under any other voluntary or compliance protocol by checking the following registries:

- VERRA, previously Verified Carbon Standard (<http://www.vcsprojectdatabase.org/>)
- American Carbon Registry (<https://acr2.apx.com/myModule/rpt/myrpt.asp>)
- Climate Action Reserve (<https://thereserve2.apx.com/myModule/rpt/myrpt.asp>)
- Clean Development Mechanism (<https://cdm.unfccc.int/>)

Verifiers also checked these registries for evidence of any ARB compliance offset projects that occurred within this same project area. The Climate Action Reserve is the only registry that lists the current project (CAR1095/CAFR5096). No evidence of double counting was found.

COP § 3.1, 3.1.1, 3.1.2

The Project is **not** mandated by any law, statute, or regulation, and verifiers found no evidence to the contrary for this reporting period. The verifiers conclude with reasonable assurance that the Project offset credits generated are additional to any laws and regulations and exceed a conservative baseline scenario.

An Improved Forest Management Project automatically satisfies the performance test.

COP § 3.2

The offset project commencement date was 1/17/2014. This data is coincident with the beginning of data collection for the carbon inventory (OPDR initial Part II). APD inventory documents from the initial verification support this claim.

COP § 3.3, 3.4

The Project Crediting Period for offset projects using the COP is 25 years. The crediting period is coincident with the start of the initial reporting period, 1/17/2014, and ends no later than 1/16/2039. This eighth reporting period includes 10/1/2020 – 9/30/2021. The OPO will monitor the forest carbon stocks for a period of 100 years following the last year of the issuance of any offset credits. These assertions are made in the listing and OPDR documents.

COP § 3.5

No Qualified Conservation Easement is in place on this property. This was confirmed by the APD in the OPDR and no evidence of a qualified conservation easement was found in a review of the deeds. The Summer Camp Conservation Easement applicable to a portion of the project area is not considered a qualified conservation easement.

COP § 3.6

The project location has not changed since the previous verification. The project land is still privately owned and located within the jurisdiction of Mendocino County, in the State of California, and in the United States of America. According to the OPDR no tribal interests or land ownership are documented within the project area; Centroid latitude and longitude coordinates are approximately 39.6297 and -123.258, respectively. The project area and properties in the general vicinity are zoned as Timber Production Zone (TPZ) and Rangeland by Mendocino County. The project area lies in a Mediterranean climate influenced by the proximity to the Pacific Ocean and topography. Temperatures range from an average of 32 degrees F in January to an average high of 93 degrees F in July. Average annual rainfall for the project area is approximately 60 inches per year. Verifier review of the USDA Plant Hardiness Zone map places the project area in zone 9a. The description of the project area's climate is available in the OPDR and project listing and was confirmed by the verifiers.

COP § 3.7

In the latest Annual OPDR, the APD attests that the project is still in compliance with all applicable laws and regulations.

The following laws and regulations were reviewed with the OPO and relevant stakeholders during the last full verification and as part of the current desk review. Verifiers found no evidence to suggest the project was not in compliance with these laws and regulations during the reporting period:

- National Wild and Scenic Rivers Act
- Endangered Species Act (ESA)
- Clean Water Act
- California Z'berg-Nejedly Forest Practice Act (1978) (FPA)
- California Forest Practice Rules (FPR)
- California Environmental Quality Act
- Porter-Cologne Water Quality Control Act
- California Endangered Species Act
- California Timberland Productivity Act (1982)
- California Water Code

COP § 3.8.1, 3.8.2

Native Species

The OPDR states the project area is still comprised of 100% native species. Based on the APD's supporting calculations for the percentage of standing live basal area by species, for the current inventory data, approximately 100% of the species in the project area are native to the region (confirmed by the team Registered Professional Forester). The verifiers calculated similar values using the individual tree data provided confirming the percentage of native species is meets the 95% or greater COP criteria.

The OPDR's calculations show that composition of the native species within the project area is mixed; no single species exceeds the species diversity index for the assessment areas. The verifiers reviewed the calculations for relative species distribution and confirmed that no species exceeds 65% depending on strata, by basal area. The maximum concentration is in Douglas fir at 40.9% /R2/.

Sustainable Management

As no commercial harvesting is occurring or planned, this requirement is not applicable for this reporting period.

Age-class distribution

As was confirmed during the last full verification of the project, verifiers found that the supporting analysis by the OPO presents data showing stands with trees younger than 20 years represents 0% of forested acres for the entire project area, below the COP threshold of 40%. The verifiers confirmed this by reviewing recent aerial/orthophoto, and receiving confirmation from the APD that there has been no harvesting on the project area since 1998 which confirmed that the project was still in compliance with this requirement.

During the previous reporting period, a wildfire impacted under 2% of the project and primarily burned the understory. Impacts from the fire were found to not affect adherence to the age class distribution requirements. As confirmed through discussions with the APD, no natural disturbances impacted the project area over the course of RP8.

Structural Elements

The natural forest management criteria require structural elements, in the form of standing and lying deadwood, are retained in ecologically sufficient quantities in the project area. The COP requires projects to demonstrate the higher of either: 1) at least 1% of standing live carbon stocks in standing deadwood or 2) at least one metric ton, on average, of deadwood per acre, or progress towards that goal.

At the end of the reporting period (9/30/2021), the APD's value for the actual onsite carbon for standing dead wood within the entire forested project area was 72,894.8 tons of CO₂e, or 1.16 metric tons of carbon per acre (equivalent to 1.82% of standing live carbon). The verifiers calculated similar values.

Both the APD and verifiers found the standing dead wood quantities, both in terms of metric tons of carbon or percent of standing live carbon, meets the required threshold values established in the COP §3.8.2.

Requirements of COP §3.8.1/3.8.2 are satisfied.

COP § 3.8.3

Since the project start date, the OPO's project monitoring worksheet shows no decrease in standing live carbon stocks. Verifiers confirmed that these calculations are correct and in congruence with the rest of the project documentation.

COP § 3.8.4

The intent of this section of the COP is to limit the regeneration harvests in even-aged management systems to stands no greater than 40 acres. Harvested stands must also meet certain criteria for age or regeneration height in adjacent stands. Since no recent harvesting has occurred or is planned on this property, and since the entire project area is composed of forests greater than 20 years old, the provisions of this section do not apply to this project and reporting period at this time.

COP § 4

The verification team can attest that no information has changed in relation to the identification of the project area since the last full verification, as the APD has submitted the following evidence once more as part of this verification:

- OPDR map appendices for the project area;
- Geographical coordinates area (also included in Part V of the OPDR);
- A description of the Assessment Areas encompassing the project (included in OPDR Part V (A));
- The determination of the project area (OPDR Part V (B));
- Present and historical land cover/land use, forest vegetation type, land pressures, climate zone classification, site class, zoning and project land use (OPDR Part V);
- GIS shape files were provided;

See Section 6.2.1 (below) for the verifiers review for the determination of site class for the project area. The verifiers confirm that the information provided above complies with the requirements of the COP (§4 & §9.1.1.1 (15) (a-l)).

COP § 5.2

The following SSRs (OPDR Table 8) were reviewed for inclusion in the Offset Project Boundary:

Project: IFM-1, IFM-3, IFM-7, IFM-8, IFM-14, IFM-17 (IFM-6 and IFM-9 are non-applicable)

Baseline: IFM-1, IFM-3, IFM-7, IFM-8; IFM-17 (IFM-6 and IFM-9 are non-applicable)

All appropriate SSRs are included. IFM-6 and IFM-9 (soil carbon impacts from mechanical site prep) are excluded as no mechanical site preparation is employed in management of the project, as confirmed by verifiers during the last full verification site visit. Likewise, IFM-6 and IFM-9 are excluded from the baseline as mechanical site prep would not be carried out during forest management in the project area as projected in the baseline scenario.

5.2 Inventory Methodology

COP Appendix A.1

The project area forests are described in section V (I) of the initial OPDR.

There is a long history of human occupation and use within the project area. Homesteading began in the mid-1800's and small ranches in the area raised pigs, sheep, horses, and cows. Clearings on the landscape that were flat to gently sloped were planted with annual grains or pastured for forage and hay. Fruit trees and small gardens were common near homesteads. Early on the region was grazed and timber harvested. Roads and fences and a few foundations are evidence of this agrarian past. Some of the worn fences have been replaced, and some wagon roads updated to graded gravel roads that meander about the property. Modern timber harvesting operations on the Project Area began in the 1930's and continued intermittently throughout the 1990's. No timber harvesting has taken place since 1998.

A check against the ARB assessment area map confirms that the entire project area is located in the Southern Cascades Supersection. The species evident on the property and in the inventory confirm appropriateness of the choice of the assessment areas. The site class calculations for each assessment area are based on a soils analysis. The site class calculations area described more fully below. The soils data were retrieved from the USDA NRCS site and site class values were verified. The calculations for the weighting of the common practice value for each assessment area within the project were also verified.

Finding for COP Appendix A.3, items 2 - 8

The APD conducted a full forest carbon inventory within the project area between January 2014 and August 2014. A partial inventory update was carried concurrently during the last full verification in November 2017 in accordance with the inventory methodology established for the project.

The fire that impacted the project area during RP7 was part of the August Complex Fire. This fire burned over a million acres in total in Northern California. It started about 40 miles to the east of the project area, burning between August and September 2020. In late September, its spread reached the Brushy Mountain property, but initially not the project area. However, it then progressed slowly into the project area, affecting about 302 acres on the eastern most extent of the project area. The APD had done the RP7 stock calculations based on growth only, but then the impact from fire required them to go out and re-inventory the burned area. The August Complex fire itself burned intensely, but then died down as it started to reach the OPO property. Once it reached privately owned lands including the project area, CalFire took over fire management/control and remained

actively engaged in fire suppression until it was distinguished. Estell Clifton of NRCM supervised the field work and re-inventory of the burned plots on behalf of the APD.

While the fire did cause an impact to the project's on-site carbon stocks during RP7 and caused some loss of carbon stocks it did not cause enough of an impact to trigger a formal unintentional reversal event under the COP. Existing Inventory SOPs were applied for the re-inventory of the 8 plots affected by the RP7 fire.

As communicated by the APD, the plots within the RP7 burn area were revisited again in September of 2021 (RP8) to check on fire-damaged trees and to determine if revisions to the Project's vegetation stratification were needed. Plot data on the eight burned plots was updated, based on observations on the revisited plots, into the Project's inventory data for this eighth reporting period, but the stratification of the burned portion of the Project Area was not revised. The data for these plots was updated by adjusting the saplings in the small plot that had died or were expected to die soon to standing dead trees and removing any trees that were no longer eligible for carbon stock quantification.

For the RP8 eORP stock estimates, all other plots that had not been impacted by the RP7 fire were grown forward in the FORSEE model as normal, with these modeled results being combined with the plot data on the eight burned plots that was updated, based on observations on the revisited plots in September 2021.

During the previous full verification, the reasonableness of the stratification scheme was confirmed, and found to be based on a combination of composition and biomass, both relatively simple to implement and representative of the Supersection. The categories were found to also allow for acres by strata to change as stand grow and/or are harvested.

The APD informed the verifiers that several hundred (~450) acres of the project area were re-stratified into different strata. The updates involve moving project area acreage from the "Low Stocked Hwd/DF strata to both the Mod Stocked DF/PP & Mod Stocked DF strata. The verifier's assessed how these strata adjustments impacted the RP8 carbon stocking and found that had the strata updates not been made (e.g. original strata assignments maintained) it would have had a de minimis impact on overall carbon stocking. In addition, the verifiers referred to the Inventory Methodology and the language regarding inventory and stratification updates.

Stratification updates are generally described in the Inventory Methodology where it states; "Where necessary, the inventory update process may result in re-stratification of portions of the timber strata. Broadly, "inventory updates" consider updates from the APD's FOSEE growth model, plot remeasurement or following timber harvest or other natural disturbance. The verifiers believe that inventory updates from the growth model influenced the APD's decision to re-stratify the portions of the project area under alternative (and existing) strata assignments that are now more representative of the forest conditions found in these locations. This is generally consistent with the language of the inventory & stratification update process described in the Inventory Methodology.

The verifier's assessed how these strata adjustments impacted the RP8 carbon stocking and found that had the strata updates not been made (e.g. original strata assignments maintained) it would have had a de minimis impact on overall carbon stocking. The verifiers accepted the stratification

updates made by the APD as appropriate and consistent with the update processes described in the inventory methodology.

The choice of assessment areas, and site class calculations used by the inventory for the project area have not changed since the previous verification and are thus still deemed reasonable by the verification team for this monitoring period. As a result, the carbon stock inputs from the inventory were deemed to be a) still in conformance with USFS and other generally accepted professional standards; and b) were effectively followed by the inventory crews, and c) the sampling procedures and inventory specifications still meet the criteria in COP App. A, table A.2.

FORSEE continues to be the growth model used by the APD to grow the inventory data to the end of the reporting period and beyond. The verifiers confirmed that no changes were made to the calibration of the setup of the FORSEE model since the previous reporting period (RP7).

The verification can confirm the following:

- The model was calibrated and used appropriately;
- The application of the model results is accurate and appropriate;
- The amount of growth predicted by the model is consistent with Forest Inventory and Analysis (FIA) program estimates for the region and is consistent with published studies;

Verifiers confirmed with the APD that FORSEE was run with the same settings as during the initial reporting period /R4/.

Details of the data management and analytical systems used by the project proponents have also not changed since the previous verification and are provided in the Addendum of the OPDR. All procedures described in various process documents, appear to have been followed. Appendix A of the Initial OPDR includes a change log, with entries noting updates to the inventory data following the original full inventory in 2014. Procedures for updating the inventory and estimates of future period stocks are provided in the initial OPDR documentation.

Identification and descriptions of known or potential disease(s) that may affect the health of the project's inventory have been described within the initial OPDR and the Forest Management Plan. Verifiers have reviewed these documents and confirm that these documents still adequately and accurately provide the necessary information to meet the intent of the COP.

Finding for COP Appendix A.4

The sampling error was recalculated by the verifier and was shown to be in close agreement with the OPO calculation (OPO 3.21%; VB 3.17%). This sampling error results in a Confidence Deduction of 0%. The sampling error is calculated based on the current inventory data which is based on a combination of grown-ahead inventory data from the 2014 inventory, and the past inventory updates.

5.3 Baseline Carbon Stocks

COP § 6.2.1 steps 1-4

As a thorough Baseline modelling review was required for the previous full verification, the degree of baseline review is thus reduced for this less intensive annual verification. Nevertheless, verifiers have traced data from the OPDR back to the results of the baseline modeling and conducted a general review of the baseline modeling process. The level of review was not further augmented as no issues

of concern surfaced during the process. The baseline modelling assumptions have been previously confirmed as being in conformance with the protocol requirements during the last full verification. The analytical methods used to apply growth to current stocks are described in Attachment M (Initial OPDR). The verifiers reviewed these calculations and procedures once more and found:

- The FORSEE model was calibrated and used appropriately;
- The application of the model results is accurate and appropriate;
- The amount of growth predicted by the model is consistent with FIA estimates for the region and is consistent with published studies; and
- The methods used to calculate biomass and carbon from tree data are consistent with the protocol and have been accurately applied.

COP § 6.2.3

Baseline carbon in harvested wood products was determined using output from the FORSEE model as described in Attachment K of the initial OPDR. Acres were assigned to a collection of yield curves developed through growth and yield modeling. Yield curves exist for various unit outputs including cubic feet, board feet, and carbon—each calculated using the protocol methods. For the previous (fifth) reporting period, the calculation of the total harvested carbon for the baseline was updated to include all trees greater than 1 inch in diameter. The original baseline average harvest volumes per year (baseline) were provided in Table 9 of the Initial OPDR.

In addition to reviewing the updated baseline Prior to Delivery to Mill (PDM), verifiers conducted cursory reviews of the overall modeling process, calculations and supporting documents, and based on these reviews and the results of the previous full verification, the verification team can confirm that the methods were accurately implemented and the associated calculations done correctly to comply with the COP specifications for estimating the average amount of carbon in standing live carbon stocks for each year over 100-year baseline period.

COP § 6.2.6

Secondary effects (leakage) are quantified for the baseline and project in the APD's calculation workbook, Secondary Effects tab. The verifier checked and confirmed the accuracy of these equations. During the previous verification, the verifiers noted that the calculation of secondary effects on the additionality tab in the carbon estimate workbook had reverted to using conifers greater than 10" diameter for the values calculated "prior to mill delivery" (cell I24 on the "Additionality" tab which is traced back to the table starting at E24 on the "Baseline" tab). It is the verifiers understanding that this change back to the original calculation approach of secondary effects was made by the APD due to the lack of formal guidance from ARB for this specific project. This was not raised as a concern by ARB during their review of RP7, and the calculation remains the same for RP8.

5.4 Project Carbon Stocks

COP § 6.2.4

Since the project start date, previous project monitoring and verification reports suggest no decrease in standing live carbon stocks. The verifier team also reviewed recent aerial imagery that confirms no recent harvesting, reversals, or significant natural disturbance are evident that might suggest a decrease in standing live stocks.

The fire that impacted the project area during RP7 was part of the August Complex Fire. This fire burned over a million acres in total in Northern California. It started about 40 miles to the east of the project area, burning between August and September 2020. In late September, its spread reached the Brushy Mountain property, but initially not the project area. However, it then progressed slowly into the project area, affecting about 302 acres on the eastern most extent of the project area. The APD had done the RP7 stock calculations based on growth only, but then the impact from fire required them to go out and re-inventory the burned area. The August Complex fire itself burned intensely, but then died down as it started to reach the OPO property. Once it reached private lands CalFire took over fire management/control and remained actively engaged in fire suppression until it was distinguished. Estell Clifton of NRCM supervised the field work and re-inventory of the burned plots.

While the fire did cause an impact to the project's on-site carbon stocks during RP7 and caused some loss of carbon stocks it did not cause enough of an impact to trigger a formal unintentional reversal event under the COP. Existing Inventory SOPs were applied for the re-inventory of the 8 plots affected by the RP7 fire.

As communicated by the APD, the plots within the RP7 burn area were revisited again in September of 2021 (RP8) to check on fire-damaged trees and to determine if revisions to the Project's vegetation stratification were needed. Plot data on the eight burned plots was updated, based on observations on the revisited plots, into the Project's inventory data for this eighth reporting period, but the stratification of the burned portion of the Project Area was not revised. The data for these plots was updated by adjusting the saplings in the small plot that had died or were expected to die soon to standing dead trees and removing any trees that were no longer eligible for carbon stock quantification.

For the RP8 eoRP stock estimates, all other plots that had not been impacted by the RP7 fire were grown forward in the FORSEE model as normal, with these modeled results being combined with the plot data on the eight burned plots that was updated, based on observations on the revisited plots in September 2021.

During the previous full verification, the reasonableness of the stratification scheme was confirmed, and found to be based on a combination of composition and biomass, both relatively simple to implement and representative of the Supersection. The categories were found to also allow for acres by strata to change as stand grow and/or are harvested.

The APD informed the verifiers that several hundred (~450) acres of the project area were re-stratified into different strata. The updates involve moving project area acreage from the "Low Stocked Hwd/DF strata to both the Mod Stocked DF/PP & Mod Stocked DF strata. The verifier's assessed how these strata adjustments impacted the RP8 carbon stocking and found that had the strata updates not been made (e.g. original strata assignments maintained) it would have had a de minimis impact on overall carbon stocking. In addition, the verifiers referred to the Inventory Methodology and the language regarding inventory and stratification updates.

Stratification updates are generally described in the Inventory Methodology where it states; "Where necessary, the inventory update process may result in re-stratification of portions of the timber strata. Broadly, "inventory updates" consider updates from the APD's FOSEE growth model, plot

remeasurement or following timber harvest or other natural disturbance. The verifiers believe that inventory updates from the growth model influenced the APD's decision to re-stratify the portions of the project area under alternative (and existing) strata assignments that are now more representative of the forest conditions found in these locations. This is generally consistent with the language of the inventory & stratification update process described in the Inventory Methodology.

The verifier's assessed how these strata adjustments impacted the RP8 carbon stocking and found that had the strata updates not been made (e.g. original strata assignments maintained) it would have had a de minimis impact on overall carbon stocking. The verifiers accepted the stratification updates made by the APD as appropriate and consistent with the update processes described in the inventory methodology.

The two primary carbon pools for the initial and the reporting period stocks, IFM 1 and IFM 3, are reported in the initial and annual OPDR, respectively. The verification can also confirm, as reported in Section 2 above, that the OPO conducted all calculations according to the protocol and found close agreement with the OPO estimates of initial stocks. OPDR reporting is consistent with the estimates shown in the supporting workbooks.

COP § 6.2.5

This project had no harvesting for this reporting period.

COP § 6.2.6

Secondary effects (leakage) are quantified for the baseline and project level by using the built-in equations of the Monitoring Calculation Worksheet. The verifier checked and confirmed the accuracy of these equations.

5.5 Calculation of GHG Reductions and Removals

COP § 6

The OPO has provided an emission calculation worksheet as the implementation of COP equation 6.1 and 6.10. These calculations account for project and baseline stocks, project and baseline harvested wood products, HWP storage, secondary effects, buffer pools and any reversals. All data entered by the user into this workbook is consistent with supporting documents. Calculations embedded in the worksheet were recalculated and checked by the verifier. These checks are available in the verifier's data check log.

5.6 Reversal Risk Rating

The table below presents the verifiers' findings pertaining to the Project's Reversal Risk Rating, following the guidance in the COP Appendix D. The verifiers concur with the assessment offered in the OPDR section VII(E) and found that it complies with the protocol guidance for each risk type. The table summarizes the evidence used to support each risk level.

Risk Type	Conform	Finding	OPDR	Verif. Check
Financial	Y	Default risk	5%	5%
Management: Illegal removal of forest biomass	Y	US default risk	0%	0%

Risk Type	Conform	Finding	OPDR	Verif. Check
Management: Conversion of project area to alternate land use	Y	Default risk (no QCE)	2%	2%
Management: Over-harvesting	Y	Default risk (no QCE)	2%	2%
Social	Y	US default risk	2%	2%
Natural disturbance: Wildfire	Y	US default risk	4%	4%
Natural disturbance: Disease or insect outbreak	Y	Default risk	3%	3%
Natural disturbance: Other episodic catastrophic even	Y	Default risk	3%	3%
Cumulative Risk	Y		19.24%	19.24%

The Project proponents have calculated their reversal risk rating to be 19.24%, which shows that the risk rating has remained fixed since the last full verification when the site visit occurred. The verifier team also reviewed the CRT Calculation Worksheet and previous years' verification reports to make sure the correct values have been utilized throughout. Further, the verifier team also recalculated the reversal risk rating and confirms that it was calculated correctly during the initial verification, as all risk factors were either defaults for the US or for the region.

6 Summary Table of Data Checks -- § 95977.1(b)(3)(L)

A summary of selected data checks for project are provided below. The assigned ranking reflects both the size and uncertainty associated with these SSRs. These and other data checks performed (along with narrative details of the check and results) are included in the verifiers data check log/V2/.

SSR (rank)	Data reviewed	Reported (OPO) tCO _{2e}	Calculated (VB) tCO _{2e}	Dis-crepancy tCO _{2e}	Impact on misstatement / conformance
	Checks performed				
Rank 1 Project stocks IFM1, IFM3 inventory & grown ahead; end of RP7 (AC _{onsite, end RP})	Inventory, volume and biomass estimates, grown modeling results, grown tree list. Carbon calculations on inventory. Model appropriateness and use. Data systems.	4,075,187.3	4,075,740.0	(552.7)	Impact on OMM
	Model performance against independent benchmarks. Checks of accumulations and correct transfer to OPDR				
Comment: Discrepancy due to slight difference in strata means.					

Rank 2 Baseline stocks IFM1, IFM3 (BC _{onsite, end RP})	OPDR and supporting modeling documents, web- based review of methods. Model appropriateness and use. Data systems.	1,853,549.0	1,853,549.0	0.0	No impact on OMM
	Model calibration. Model performance against independent benchmarks. Checks of accumulations and correct transfer to OPDR				
Comment: NA					
Rank 3 Quantified GHG removal enhance- ments (QR _{end RP})	OPDR	107,382.0	107,832.0	0.0	No impact on OMM
	Checks that all OPO entries are correct. Check sources. Checks that calculations within the worksheet are correct. Calculation check uses OPO values.				
Comment:					
Rank 4 IFM7, IFM8 Baseline, end RP6 (BC _{wp,end RP})	OPDR, supporting worksheets	10,876.0	10,876	0.0	No impact on OMM
	Model results, HWP worksheet Confirm model projections and sums. Correct use of HWP worksheet.				
Comment:					
Rank 5 Secondary Effects (SE _y)	OPDR, supporting worksheets	(7,762.5)	(7,762.5)	0.0	No impact on OMM
	Trip Tickets & Mill Receipts, HWP worksheet				
	Confirm model projections and sums. Correct use of HWP worksheet				
Comment:					
Rank 6 Confidence Deduction (CD _{end RP})	OPDR, supporting worksheets	0.0	0.0	0.0	No impact on OMM
	Use OPO data for initial stocks; checks the calculation of CD was done correctly. Recalculated from initial inventory.				

Comment:						
Rank 7 IFM7, IFM8 Project HWPs, end RP5 (AC _{wp,end} RP)	OPDR, supporting worksheets		0.0	0.0	0.0	No impact on OMM
	Confirm model projections and sums. Correct use of HWP worksheet					
Comment:						
Rank 8 Buffer Pool and Risk Rating	OPDR, calculation workbooks, supporting documents.		20,656.0	20,656.0	0.0	No impact on OMM
	Checks that all OPO entries are correct. Check risk rating and calculations have been calculated correctly.					
Comment:						

7 Offset Material Misstatement -- § 99577.1(b)(3)(O)

The verification team must state with reasonable assurance that the percent overstatement of the OPO's total reported GHG emission reductions and removal enhancements is no more than a 5.00% overstatement of the "true" GHG emission reductions and removal enhancements, as calculated by the verifier using the equation below (§99577.1(b)(3)(Q)). The analysis must consider all discrepancies, omissions, or misreporting, for the subset of data included in the data checks. Any omissions, discrepancies, and misreporting errors are identified separately in Table 1 above.

$$\text{Percent error} = \frac{[\sum \text{Discrepancies} + \sum \text{Omissions} + \sum \text{Misreporting}] \times 100\%}{\text{Total Reported Emission Reductions and Removal Enhancements}}$$

Total discrepancies, omissions and misreporting*	Total RP emission reductions (before buffer pool) $QR_{\text{end RP}}$	Calculated OMM %
(552.7)	107,382.0 tCO ₂ e	0.51%

*Note: In this column, a positive value represents *over-reporting* by the OPO.

The percent OMM is 0.51%, *under-reporting*. Therefore, the project is less than the threshold of 5.00% over-reporting for the offset material misstatement.

APPENDIX A: REFERENCE LIST

OPO Documents

Ref #	Document Description	Filename
/R1/	Annual OPDR	Brushy Mountain Annual OPDR RP8 V1.1.1.2.pdf
/R2/	Calculation Workbooks	Brushy Mountain Carbon Estimate Verification RP8 V1.1.1.xlsx

/R3/	Brushy Fire Reference Documents	RX NORTH-085 MEU RM-75_062317_Final.pdf Brushy Fire _ Welcome to CAL FIRE.pdf Plot Data Quality Assurance.pdf
/R4/	Modeling	Brushy_Mountain_RP8_Unadjusted_unlinked_FSE.mdb Brushy_Mountain_RP8_v1_1_unlinked_CAR31v11B.mdb Brushy_Mountain_RP7_v3_FSE.mdb Brushy_Mountain_RP8_Unadjusted_FSE.mdb Brushy_Mountain_RP8_v1_1_CAR31v11B.mdb Brushy_Mountain_RP8_v1_FSE.mdb
/R5/	Guidance	ARB Guidance 8_15_2018 Yiu Email.pdf ARB Guidance 12_11_2018 Yiu Email.pdf
/R6/	Spatial	Strata_RP8.shp
/R7/	Easement Monitoring	2020 Monitoring Report_Eel River II - Summer Camp CA_Final.pdf 2021 Monitoring Report_Eel River II - Summer Camp CA_Final.pdf
/R8/	Change Log	Brushy Mountain Inventory Methodology Change Log 9_25_2021 V1.0.pdf

Verifier Documents

Ref #	Document Description	Date & Filename
/V1/	COI	CAFR5096-RP8_COI.docx
/V2/	Data Check Log	CAFR5096-datachecklog_RP8_20211229.xlsx
/V4/	Issues Log	CAFR5096-RP8_Issues_Log_v1.1_20220119.docx
/V5/	Kick-Off Agenda	CAFR5096-RP8_KickOffAgenda.docx
/V7/	NOVS	CAFR5096-RP8_NOVS.docx
/V8/	Sampling Plan	CAFR5096-RP8_SamplingPlan_v1.2_20220124.docx
/V10/	Verification Plan	CAFR5096-RP8_VerificationPlan_v1.2_20220124.docx

Interviews

The following is a list of the people interviewed as part of the verification. The interviewees included those people directly, and in some cases indirectly, involved and/or affected by the project activities. The training and qualifications of the APD technical consulting team was confirmed by referencing bios for the team on APD and TC websites. The verification team also confirmed these qualifications during interviews with the team on the site visit.

Date	Name	Title/description
Throughout verification	Jim Clark, Estelle Clifton	APD contacts (North Coast Resource Company)
1/6/2022	Jaren Kuipers	Land Steward Services, LLC (Contractor for 2020 easement compliance monitoring hired by Rocky Mountain Elk Foundation)

ARB and OPR Conferences and Communication

Date	Name	Description
N/A	N/A	None

APPENDIX B: ORGANIZATION DETAILS

Contact Information

OPO	APD	Auditor
Lori Withey, Coastal Forestlands	Jim Clark, NCRM	Kyle Silon, Managing Director, S&A Carbon
PO Box 537, Willits, CA, 95490	PO Box 435, Calpella, CA, 95418	7831 SE Stark St #202, Portland, OR, 97215
707-459-3096; loriwithey@sbcglobal.net	707-485-7211; jimclark@ncrm.com	971-235-7835; kyle.silon@saacarbon.com

APPENDIX C: PROJECT TEAM

Verification Team	Qualifications
Lawson Henderson	Lawson Henderson brings nearly a decade of experience in forest certification through his prior employment with Rainforest Alliance, where he acted as a project manager and lead auditor of forest carbon offset projects against the major voluntary GHG programs, and FSC Forest Management & Chain of Custody Certifications. Lawson is qualified as a Lead Verifier under the Climate Action Reserve (CAR), and is also qualified as a AFOLU IFM Expert under the Verified Carbon Standard (VCS) program. He has led the validation and verification of IFM, AR & REDD forest carbon offset projects against the major voluntary GHG programs globally. Lawson holds a B.S.F in forest management from the University of New Hampshire (2005).
Kyle Silon	Kyle Silon holds an M.S. in Energy and Environmental Economics. He has ten years' experience in climate change mitigation strategies and carbon reduction projects. Prior to founding S&A, he worked for a leading international certification company, specializing in validation and verification of small-scale household energy demand projects (such as cook stove and water filter projects), primarily located in South America, Asia, and Africa. He has participated in numerous verifications of forestry, landfill, and livestock projects, and has worked across all major GHG programs, including the Air Resources Board, Verified Carbon Standard, Climate Action Reserve, American Carbon Registry, Gold Standard, and Clean Development Mechanism (CDM).

Verification Team	Qualifications
Elizabeth McGarrigle	Elizabeth McGarrigle holds three forestry degrees (BScF, MScF, PhD). Her work has focused on forest inventory, growth and yield, and forest management planning. During her Masters she focused her work on examining the impact of uncertainties in the inputs to long term forest management plans when optimization models are employed. While completing her PhD, she was part of a larger project developing a regional growth and yield model for the Acadian forest in the Northeastern United States and Canada. She developed a stand-level model that is used to predict survivor growth, ingrowth, and mortality in the region. As part of her dissertation, she dealt with several variants of the Forest Vegetation Simulator and several regional growth and yield models from across Canada and the United States. Dr. McGarrigle is currently working with the provincial government in Nova Scotia Canada as a Forest Inventory Data Analyst where she is responsible for the design and analyses of permanent sample plots. In addition to her work as a biometrician on several ARB forest projects, she has also been involved in research at Natural Resources Canada using a fine scale forestry model to assess the impact of climate change on species composition in forest types across Canada.
Alexa Kandarlis	Alexa Kandarlis has 3 years' experience in carbon auditing and climate change mitigation policy and is accredited by ARB as a verifier under their US Forests protocol. In this time, she has participated in over 50 verifications of carbon offset projects and corporate inventories under a variety of GHG programs, including the Air Resources Board, Climate Action Reserve, American Carbon Registry, and Carbon Disclosure Project. Alexa developed tracking systems for a program registered under the Clean Development Mechanism as a Program of Activities and has been involved in registering this program of activities with the Gold Standard. Prior to this, Alexa conducted extensive research on emissions leakage in addition to authoring work pertaining to the structure of California Assembly Bill 32. Alexa is currently responsible for implementation of S&A's corporate management system to ensure ongoing improvement and compliance with ISO requirements. In addition to this, she has field experience with Forestry, Ozone Depleting Substances, and Livestock verification projects. She holds a Bachelor of Arts in Economics with a minor in Business Administration, and a focus on natural resource and environmental Economics.
Thomas Blair	Thomas Blair holds a BS from Humboldt State University, graduating in 1993. He worked with Western Timber Services from 1994 – 1999, which preceded his foundation of Blair Forestry Consulting in 2000. Blair Forestry Consulting is primarily focused on timber cruising and timber harvest plan layout. Thomas has been involved in many carbon projects both as a California RPF (#2607) as well as has worked on carbon projects outside of the state of California.