

U.S. FOREST OFFSET PROJECT DATA REPORT ANNUAL REPORTING PERIOD – ALL PROJECT TYPES

OPR Staff Use Only	Date Report Received:	OPR Tracking Number:	Date Report Reviewed:	OPR Staff Use Only
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Complete for all reporting years. Entities submitting the project's first Offset Project Data Report must submit the information requested in both **Initial Reporting Period** and the **Annual Reporting** forms to the appropriate Offset Project Registry. For every reporting period thereafter, submit only the information requested in the Annual Reporting Period form.

PART I. ENTITY SUBMITTING REPORT

Is this form being submitted by the Offset Project Operator (OPO) or by the Authorized Project Designee (APD)? <i>Note: The person completing this form should be an OPO/APD employee.</i>			☐ OPO ☒ APD
Report Version Number: 3.1.1.1	Date Report Completed: 11/16/2020	Date Report Submitted: 11/16/2020	
Person Completing Report: James D. Clark	Phone Number: 707-485-7211	Email Address: Jimclark@ncrm.com	

PART II. OFFSET PROJECT INFORMATION

Offset Project Name: Brushy Mountain			
OPR Project ID#: CAR1095	ARB Project ID# (if known): CAFR5096	Offset Project Commencement Date: January 17, 2014	
Date of Last Full (On-Site) Verification: September 14, 2017	Reporting Period Start Date: October 1, 2019	Reporting Period End Date: September 30, 2020	
Is this report being submitted for a verification year?			☒ Yes ☐ No
Protocol Version for Project Listing: ☒ October 20, 2011 ☐ November 14, 2014		Protocol Version for Project Reporting: ☒ October 20, 2011 ☐ November 14, 2014	
Is this Offset Project Data Report (OPDR) being submitted for the project's initial Reporting Period? If "yes", the entity submitting this report must also submit the information required in section 9.1.1 of the U.S. Forest protocol. To submit that information, an OPO/APD submitting an OPDR may use one of three Initial Reporting Forms identified in the question immediately below.			☐ Yes ☒ No
With this Annual OPDR, is any one of the following three U.S. Forest Offset Project Data Report Initial Reporting Period forms also being submitted?		☐ Reforestation ☐ Improved Forest Management ☐ Avoided Conversion	

PART III. OPO/APD INFORMATION

A. OPO			
OPO Name: Coastal Forestlands, LTD., a California Limited Partnership		OPO's CITSS ID#: CA 1769	
Mailing Address: PO Box 537	City: Willits	State: CA	Zip: 95490
Contact Person: Lori Withey	Phone Number: (707) 459-3096	Email Address: loriwithey@sbcglobal.net	
B. APD (if applicable)			☐ No APD/Not Applicable
APD Name: James D. Clark		APD's CITSS ID#: CA 1569	
Mailing Address: PO Box 435	City: Calpella	State: CA	Zip: 95418
Contact Person: James D. Clark	Phone Number: (707) 485-7211	Email Address: Jimclark@ncrm.com	

PART IV. OFFSET PROJECT ELIGIBILITY REQUIREMENTS	
A. Have the Forest Project and associated Project Lands met and been in compliance with all local, state, and federal regulatory requirements during the Reporting Period? If no, provide an explanation of the non-compliance. N/A	☒ Yes ☐ No
B. Indicate how the offset project meets the definition of Natural Forest Management per Table 3.2 in the U.S. Forest protocol by completing Questions B1-B4 below: <i>Note: Reforestation projects with deferred inventory and Project Boundaries are still required to complete Questions B1-B4.</i>	
1. Native species: a) Does the project consist of at least 95% native species based on the estimated sum of carbon in the standing live carbon pool? <i>If "no," proceed to question 1b. Otherwise, skip to question B2.</i> See Addendum to OPDR (Annual) IV.B.1.	☒ Yes ☐ No
b) Describe how the project will result in achieving a 95% native species goal over the project life. N/A	
2. Composition of native species: a) Does the Project Area naturally consist of a mixed species distribution such that no single species' prevalence exceeds the percentage value of standing live carbon shown under the heading 'Species Diversity Index' in the Assessment Area Data File? <i>If "no," proceed to questions 2b and 2c. Otherwise skip to question B3.</i> See Addendum to OPDR (Annual) IV.B.2	☒ Yes ☐ No
b) Explain how the project will demonstrate a trend toward achieving the Species Diversity Index of native species and meet this requirement within 25 years. N/A	
c) If the Project Area does not naturally consist of a mixed species distribution: Will or have you provided a written statement from the government agency in charge of forestry regulation in the state where the project is located stipulating that the Project site is not capable of meeting the requirement of mixed species distribution.	☐ Yes ☐ No
3. Distribution of age classes/sustainable management: a) Indicate how the project meets the requirement for sustainable management if regeneration or commercial harvesting is either planned or initiated within the Project Area demonstrating sustainable long-term harvesting practices. This applies to all forest landholdings of the Forest Owner(s) (check one of the boxes). <i>The full text associated for the options below is found in section 3.8.1 of the U.S. Forest protocol.</i> ☐ Third party certification ☐ Adhere to a renewable long-term management plan ☐ Employs uneven-aged silvicultural practices & maintain canopy retention averaging 40% across forest ☒ Not applicable, no commercial harvesting in planned within the project area See Addendum to OPDR (Annual) IV.B.3(a).	
b) On a watershed scale up to 10,000 acres (or the Project Area, whichever is smaller), projects must maintain, or make progress toward maintaining, a maximum of 40% of the project's forest lands in ages that are less than 20 years old. (Areas impacted by Significant Disturbance are exempt from this test until 20 years after reforestation of such areas.) Does the acreage within this project meet this requirement? <i>If "no," proceed to question 3c. Otherwise, skip to question B4.</i> See Addendum to OPDR (Annual) IV.B.3(b).	☒ Yes ☐ No
Explain how the project demonstrates continuous progress toward meeting this requirement within the next 25 years. N/A	
4. Structural elements (standing and lying dead wood): How does the project ensure that structural elements are retained in sufficient quantities throughout the project life? See Addendum to OPDR (Annual) IV.B.4.	
C. Has there been a decrease in the standing live carbon stocks within the Project Area over any 10-year consecutive period? <i>For the Initial Reporting Period, check "No." If "No," skip to Part V. If yes, answer questions C1 and C2.</i>	☐ Yes ☒ No
1. If yes, identify the appropriate option and provide additional documentation. ☐ Decrease is due to the necessity to substantially improve the Project Area's resistance to wildfire, insect, or disease risks. Actions that will be taken to reduce the risks must be documented and the techniques used to improve resistance must be supported by relevant published peer reviewed research. ☐ Decrease is associated with a planned balancing of age classes and is detailed in a long-term	

management plan that demonstrates harvest levels can be permanently sustained over time and that is sanctioned and monitored by a state or federal agency. This documentation must be submitted at the time of the Project's Listing.

☐ Decrease is part of normal silviculture cycles for forest ownerships less than 1,000 acres.

Note: Documentation is required to be submitted. See Section X for details.

- | | |
|--|---|
| 2. Has the Project's inventory of standing live carbon stocks fallen below the Project's baseline standing live carbon stocks, or 20 percent less than the Project's standing live carbon stocks at the project's initiation (whichever is higher)? | ☐ Yes
☐ No |
|--|---|

PART V. PROJECT CHANGES

- | | |
|--|--|
| A. Is all the information in the offset project listing still accurate?
<i>If "Yes," skip to question B.</i> | ☐ Yes
☒ No |
| 1. Does Part II above report an updated Offset Project Commencement Date, Reporting Period Start Date, and/or Reporting Period End Date? | ☐ Yes
☒ No |
| 2. Does Part III above report updated OPO/APD Information? | ☐ Yes
☒ No |
| 3. Are there updates to the Land Ownership listing information?
<i>If "Yes," provide updates below (and/or provide as separate attachment):</i> | ☐ Yes
☒ No |
| 4. Are there updates to the Offset Project Area listing information?
<i>If "Yes," provide updates below (and/or provide as separate attachment):</i>
See Addendum to OPDR (Annual) V.A.4 | ☒ Yes
☐ No |
| 5. Are there updates to the Carbon Stock Inventory listing information?
<i>If "Yes," provide updates below (and/or provide as separate attachment):</i>
See Addendum to OPDR (Annual) V.A.5. | ☒ Yes
☐ No |
| 6. Are there updates to the Offset Project Baseline listing information?
<i>If "Yes," provide updates below (and/or provide as separate attachment):</i>
See Addendum to OPDR (Annual) V.A.6 | ☒ Yes
☐ No |
| 7. Are there any other updates to the listing information?
<i>If "Yes," provide updates below (and/or provide as separate attachment):</i>
See Addendum to OPDR (Annual) V.A.7 | ☒ Yes
☐ No |
| B. Have there been any changes in the status of the Forest Owner including, if applicable per Section 3.8.1 of the U.S. Forest protocol, the acquisition of new forest landholdings? | ☐ Yes
☒ No |
| If yes, describe the changes. Include the sale or transfer of any portion of land within Project Area.
N/A | |
| C. Optional: Has a Qualified Conservation Easement (QCE) been recorded since the previous Reporting Period?
<i>If this is for the Initial Reporting Period, check "Yes" if a QCE has been recorded since Listing, check "No" otherwise. If "No," skip to Question D.</i> | ☐ Yes
☒ No |
| Optional: If yes, provide the date the QCE was recorded. Also provide a copy of the QCE to ARB.
N/A | |
| D. Optional: Have there been any modifications to the inventory methodology of any carbon pools included in the project's boundary since the last Reporting Period?

<i>All projects are required to document any modifications to inventory methodologies in a change log and obtain approval in advance. Qualifying Reforestation Projects may defer answering this question until the second full verification. If this is for the Initial Reporting Period, check "No," unless there have been modifications since project listing, in which case, check "Yes."</i> | ☐ Yes
☒ No
☐ Defer |
| Optional: If yes, describe the modifications.
N/A | |

PART VI. REVERSALS

Note: Qualifying Reforestation Projects may defer items marked with an asterisk until the second verification.

- | | |
|---|---|
| A. Has a reversal occurred during the Reporting Period covered by this report?
<i>If this is for the Initial Reporting Period, check "No."</i>
<i>If "No," skip to question B.</i> | ☐ Yes
☒ No |
| Has the reversal been classified as intentional or unintentional? | ☐ Intentional
☐ Unintentional |
| Optional: Date(s) Reversal Occurred:
N/A | Optional: Estimated Quantity of Reversal in Units of MtCO₂e:
N/A |
| Describe and explain the reversal. | |

N/A		
What is the status of the compensation for the reversal?		
N/A		
B. For verification years ONLY : Has a reversal occurred during the previous six years? <i>If this is for the Initial Reporting Period, check "No."</i>		☐ Yes ☒ No
Has the reversal been classified as intentional or unintentional?		☐ Intentional ☐ Unintentional
Optional: Date(s) Reversal Occurred:	Optional: Estimated Quantity of Reversal in Units of MtCO ₂ e:	
N/A	N/A	
Describe and explain the reversal.		
N/A		
What is the status of the compensation for the reversal?		
N/A		
C. What is the Project's reversal risk rating?	Risk Rating: 19.236%	☐ Defer
What is the Project's fire risk based on level of fuel treatments?	☐ High (2%) ☐ Medium (2.652%) ☐ Low (3.304%) ☒ None (4 %)	

PART VII. HARVEST VOLUMES AND CARBON IN WOOD PRODUCTS

Note: Qualifying Reforestation Projects may defer items marked with an asterisk until the second verification.

A. *Provide an estimate of the harvest volume for this Reporting Period. This estimate refers to the volume of trees harvested for wood products only.	Harvest Volume (lbs): 0	☐ Defer
B. *Indicate the estimated mill efficiency for wood products produced from the Project Area following requirements in Appendix C, Section C.2.	Mill Efficiency (percent): 67.5	☐ Defer
C. *Provide an estimate of carbon in harvested wood products associated with the harvest volumes reported for this Reporting Period.	Carbon estimate (MtCO ₂ e): 0	☐ Defer

PART VIII. CARBON STOCKS

In the appropriate columns below, enter the name/identification of all required carbon pools and its estimated carbon stock (MtCO₂e) for the current Reporting Period.

For verification years ONLY: Report the estimated carbon stock for every year since the Project's last verification.

☐ Defer

Reforestation Projects may defer full inventory of carbon stocks not affected by site preparation until second verification. If deferring, carbon stocks affected by site preparation must still be reported below.

Carbon Pool Identify the pool by the SSR code (e.g., AC-1) and description (Standing live carbon) in Tables 5.1-5.3.	Current Reporting Period	Current Reporting Period minus 1 year	Current Reporting Period minus 2 years	Current Reporting Period minus 3 years	Current Reporting Period minus 4 years	Current Reporting Period minus 5 years
	10/1/2019 to 9/30/2020	/	/	/	/	/
IFM-1 Standing Live carbon	3,881,612					
IFM-3 Standing Dead Carbon	69,730					
IFM-7 Carbon in in-use Forest Products	0					
IFM-8 Forest Product Carbon in Landfills	0					
IFM-14 Biological emissions /removals from change in harvesting on forestland outside Project Area	-7,763					

PART IX. BASELINE CARBON STOCKS

In the appropriate columns below, enter the name/identification of all required carbon pools and its estimated **baseline** carbon stock (MtCO₂e) for the current Reporting Period.

For verification years **ONLY**: Report the estimated **baseline** carbon stock for every year since the Project's last verification.

☐ Defer

Reforestation Projects may defer estimating baseline carbon stocks not affected by site preparation until a full inventory is obtained. If deferring, baseline estimates of carbon stock affected by site preparation must still be reported below.

See Addendum to OPDR (Annual) XI.

Carbon Pool Identify the pool by the SSR code (e.g., AC-1) and description (Standing live carbon) in Tables 5.1-5.3.	Current Reporting Period 10/1/2019 to 9/30/2020	Current Reporting Period minus 1 year to /	Current Reporting Period minus 2 years to /	Current Reporting Period minus 3 years to /	Current Reporting Period minus 4 years to /	Current Reporting Period minus 5 years to /
IFM-1 Standing Live carbon	1,777,068					
IFM-3 Standing Dead Carbon	76,481					
IFM-7 Carbon in In-use Forest Products	6,626					
IFM-8 Forest Product Carbon in Landfills	4,250					

PART X. QUANTIFICATION FACTORS

In the appropriate column below, enter the value for the current Reporting Period.

For verification years **ONLY**: Report the estimated values for every year since the Project's last verification.

Note: Qualifying Reforestation Projects may defer items marked with an asterisk until the second verification.

See Addendum to OPDR (Annual) XI.

	Current Reporting Period 10/1/2019 to 9/30/2020	Current Reporting Period minus 1 year to /	Current Reporting Period minus 2 years to /	Current Reporting Period minus 3 years to /	Current Reporting Period minus 4 years to /	Current Reporting Period minus 5 years to /
A. Secondary Effects (MtCO ₂ e)	-7,763					
B. Net Change in Carbon Stored in Wood Products (MtCO ₂ e)	-8,701					
C. *Confidence Deduction (%) ☐ Defer	0.0					
D. *Forest Buffer Account Contribution (MtCO ₂ e) ☐ Defer	18,260					
E. For Avoided Conversion Projects ONLY : What is the Project's uncertainty discount factor?					%	☒ N/A

PART XI. TOTAL NET GHG REDUCTIONS AND GHG REMOVAL ENHANCEMENTS (QR_y)

In the appropriate column below, enter the total net GHG Reductions and GHG Removal Enhancements (MtCO₂e) for the current Reporting Period and all Reporting Periods since the Project's last full verification.

For verification years **ONLY**: Report the total net GHG Reductions and GHG Removal Enhancements for every year since the Project's last verification.

See Addendum to OPDR (Annual) XI.

Current Reporting Period	Current Reporting Period minus 1 year	Current Reporting Period minus 2 years	Current Reporting Period minus 3 years	Current Reporting Period minus 4 years	Current Reporting Period minus 5 years
	/ to /	/ to /	/ to /	/ to /	/ to /
94,923					

PART XII. ATTESTATION AND OPO SIGNATURE

JDC Initial	I certify under penalty of perjury under the laws of the State of California the GHG reductions and/or GHG removal enhancements for			
	Project Name: Brushy Mountain			
	from	Reporting Period Start Date: October 1, 2019	to	Reporting Period End Date: September 30, 2020
	are measured in accordance with the Compliance Offset Protocol			
Check the appropriate Compliance Offset Protocol: ☒ U.S. Forest Projects, October 20, 2011, ☐ U.S. Forest Projects, November 14, 2014, and all information required to be submitted to ARB is true, accurate, and complete.				
In signing this form, I certify under penalty of perjury of the laws of California that the information contained in this form is true, accurate, and complete. I further certify that I am duly authorized to represent and legally bind the Offset Project Operator (OPO) on all matters related to this form.				
SIGNATURE: 			PRINTED NAME: James D. Clark	
TITLE: Authorized Project Designee			DATE: 11/16/2020	



Brushy Mountain

CAR1095, CAFR5096

Addendum to OPDR for the Annual Reporting Period Form

Under

California Air Resources Board

Compliance Offset Protocol – U.S. Forest Projects

Adopted: October 20, 2011

Prepared November 16, 2020

Version 3.1.1.1

Offset Project Operator	Authorized Project Designee
Coastal Forestlands, LTD., a California Limited Partnership 96 North Main St. Willits, CA 95490 (707) 459-3096	James D. Clark PO Box 435 Calpella, CA 95418 (707) 485-7211

Reporting Period

The reporting period for this Offset Project Data Report is from 10/1/2019 to 09/30/2020, or the sixth reporting period.

Protocol Version

Air Resources Board

Compliance Offset Protocol – U.S. forest Projects

Adopted: October 20, 2011

The OPDR and all other project documentation and reports that reference carbon stocks have been prepared and submitted by James D. Clark, California Registered Professional Forester (No. 2528).

Introduction

Brushy Mountain is an Improved Forest Management (IFM) Project that is seeking registration under the California Air Resources Board Compliance Offset Protocol – U.S. Forest Projects Adopted: October 20, 2011. The Offset Project Operator is Coastal Forestlands, Ltd. The Project is approximately 16,412.83 acres in size.

Reporting Period Summary

No commercial harvesting occurred during the reporting period. A portion of the Project was burned by the August Complex fire that ignited from numerous lightning strikes on August 17, 2020. The affected portion of the Project is within the South Zone of the August Complex fire. Approximately 302 acres of the Project containing eight inventory plots was burned when the fire traveled west off land owned by the United States Forest Service. The Project area was inspected to verify the extent of the burn and the affected plots re-inventoried. Plots near and outside of the burn boundary were visited to confirm they were not affected. The fire intensity varied within the burned portion of the Project, primarily burning in the understory, and occasionally burning as a crown fire. Deceased trees with diameters greater than or equal to 5.0 inches largely were found to remain on the plots as snags. The re-inventoried plot data has been updated and incorporated into the Project's inventory data for the seventh reporting period.

IV.B.1.

The Brushy Mountain Project Area is characterized by a mix of Douglas-fir, native pines and other conifers, oaks, madrone, and other native hardwoods. 100% of the Project's biomass is in native species and thus the Project meets the 95% criteria for carbon in native species.

IV.B.2.

The Brushy Mountain Project Area is characterized by a mix of predominantly Douglas-fir, with some ponderosa pine, sugar pine, incense cedar, gray pine, and white fir, and hardwoods

consisting of California black oak, interior live oak, Oregon white oak, madrone, California bay laurel, and other native hardwoods. Based on the 2014 inventory, the Project Area is composed of approximately 41% Douglas-fir, 13% ponderosa pine, 3% other conifers, 11% California black oak, 14% interior live oak, 6% Pacific madrone, 7% white oak, and 5% other hardwoods by basal area. The Brushy Mountain owners intend to manage the timber stands to maintain species diversity, ensuring that the Project continues to meet the requirements for composition of native species under Table 3.2 (page 20) of the Compliance Offset Protocol by maintaining species' basal area percentage below 65% , the Species Diversity Index from the Assessment Area Data File.

IV.B.3.

- (a) The Brushy Mountain project will employ natural forest management practices as described in items VI.B.1, VI.B.2, VI.B.3(b), and VI.B.4 as well as sustainable harvesting practices if it elects to conduct commercial harvesting in the future. Commercial harvesting is not currently planned in the Project Area for the near term. If the forest owners elect to conduct commercial harvesting in the future, sustainable long-term harvesting practices will be demonstrated using one or more of the compliant options allowed under section 3.8.1 of the Protocol.
- (b) There are currently no immediate plans to harvest on the Brushy Mountain Project Area. In the future, the Brushy Mountain owners will employ management practices which meet the sustainable management requirements under Table 3.2 (page 21) of the Compliance Offset Protocol by maintaining less than 40% of the Project's forested acreage in ages less than 20 years. Present conditions for the Project Area already satisfy these requirements as well over 90% of the Project Area acreage has not been harvested over the last 20-year period. Please see the table below that lists Project acres by Cal Watershed.

Project Area Acres by CAL Watershed are as follows:

CALWATER Watershed	IDNUM	Project Acreage	% of Acreage < 20 Years
Blacksmith Creek	1111.710204	1,841	0.0%
Deep Hole Creek	1111.710202	658	0.0%
Eastman Creek	1111.710404	2,488	0.0%
Fish Creek	1111.620503	709	0.0%
Garcia Creek	1111.620203	611	0.0%
Indian Creek	1111.620502	2,171	0.0%
Low Gap Creek	1111.710203	288	0.0%
Lower Salt Creek	1111.710403	1,829	0.0%
Old Woman Canyon	1111.620202	1,295	0.0%
Rodeo Creek	1111.620602	1,896	0.0%
Upper Salt Creek	1111.710401	2,628	0.0%
Grand Total		16,413	

IV.B.4.

The Brushy Mountain Forest Owners do not actively remove lying dead wood as a part of their stand management activities. It is expected that the accumulation of lying dead wood will be commensurate with recruitment from standing dead trees. The Brushy Mountain Forest Owners are committed to maintaining if not increasing, the number of standing dead trees within the Project Area as a component of their forest management objectives. The Brushy Mountain Forest Owners do not currently, nor do they intend in the future to actively pursue salvage operations on their timberlands except in the event of fire, disease or other disturbance. The Brushy Mountain Forest Owners have a policy of allowing standing dead trees to remain and recruiting large specimen trees across their ownerships as components of their overall timber management strategy as evidenced by the specimens of old growth Douglas-fir, ponderosa pine, California black oak, and Pacific madrone found throughout the Project Area. The Brushy Mountain Project Area has not recently undergone any salvage harvesting. Therefore, all that must be demonstrated is that the greater of one metric ton of carbon per acre or 1% of standing live carbon stocks is present in standing dead wood, or that progress towards these targets is ongoing. The project currently contains an average of **1.16** Mg C per

acre and 1.8% of standing live carbon stocks in standing dead wood. Therefore, the project currently meets the aforementioned standing dead wood target.

V.A.

The following information is copied from the Annual OPDR addendum for the initial reporting period submitted on May 9, 2014, no additional changes to the listing information have been made in this Annual OPDR.

The adjustments to the Application for Listing and Improved Forest Management U.S. Forest Offset Project are listed by section number as they appear on the listing form.

V.A.4

The project acreage has been revised from 16,392 to 16,412.83 acres.

V.A.5

Following new guidance from the ARB, the “adjusted tariff for small trees” portion of the cubic volume calculations for ponderosa pine, gray pine, sugar pine, incense cedar, and Douglas-fir was changed to reflect the updated interpretation of the protocol. A description of this change in inventory methodology has been documented in the Brushy Mountain Carbon Project Inventory Change Log.

VI.B.4.

Structural elements (standing and lying dead wood):

The project carbon stocks in standing dead wood changed from 1.29 Mg C per acre to 1.27 Mg C per acre. The percentage of standing live carbon stocks in standing dead wood remained at approximately 2.4%.

VII.C.

Summary of the inventory of carbon stocks for each carbon pool:

IFM-1 Standing Live: 3,156,228 MgCO₂e

IFM-3 Standing Dead: 76,481 MgCO₂e

IFM-14 Biological emissions/removals from change in harvesting on forestland outside Project Area: 7,763 MgCO₂e annually.

V.A.6

VIII.A.5.

The description of the effects of woods products has been augmented, with updated figures.

VIII.A.5.

The method for calculating baseline wood products Prior to Delivery to the Mill ("PDM") has been modified to include all trees above one-inch DBH. This change will affect the Secondary Effect Adjustment from the fifth reporting period onward.

VIII.B.1.

The revised estimated initial above ground standing live carbon stock per acre for the project is:

149.26 MgCO₂e per acre

VIII.B.3.

The revised Common Practice statistic associated with the Project Area is:

86.43 MgCO₂e per acre.

V.A.7

VII.D.

The inventory confidence statistics were augmented with updated figures based on the updated carbon stock estimates.

VIII.B.8.

The method used to confirm financial feasibility changed from the second approach, providing evidence that activities similar to the assumed baseline growth and harvest scenario have taken place on other properties within the Forest Project's Assessment Area within the past 15 years and that harvesting activities have taken place on sites comparable to the Project Area, to the first approach, involving a financial analysis of the baseline growth and harvesting regime.

Attachment K-Modeling Plan:

The modeling plan has been updated to fully describe the baseline reported in the OPDR for the initial reporting period.

VIII.

Carbon Pool	Source	Gross CO2e Tonnes per Acre	Total Gross CO2e Tonnes	SSR
Live Carbon Stocks	Sample Plots	236.50	3,881,612	IFM-1
Standing Dead Carbon Stocks	Sample Plots	4.25	69,730	IFM-3
Sum of CO2-equivalent Tonnes from Required Pools		240.75	3,951,342	
Carbon in in-use Forest Products	Harvest Records	N/A	0	IFM-7
Forest Product Carbon in Landfills	Harvest Records	N/A	0	IFM-8
Biological emissions/removals from change in harvesting on forestland outside Project Area	Harvest Records	N/A	-7,763	IFM-14

XI.

Quantification of Total Net GHG Reductions and GHG removal enhancements (QR_y):

	Reporting Period	RP7	Notes
1	Actual Onsite Stocks	3,951,342	This is the total carbon in all reported pools within the Project Area, regardless of statistical confidence. ($AC_{\text{onsite}, y}$)
2	Confidence Deduction	0.0%	The confidence deduction is based on the sampling error of the combined estimate of carbon in all onsite carbon pools (see above). (CD_y)
3	Adjusted Actual Onsite Stocks (Adjusted for Confidence Deduction)	3,951,342	Actual onsite carbon stocks adjusted using the confidence deduction. $AC_{\text{onsite}, y} * (1 - CD_y)$
4	Annual Increment in Actual Onsite Carbon Stocks	111,387	Difference from prior reporting period ($\Delta AC_{\text{onsite}}$). In reporting period 1, prior stocks are assumed to be zero, so difference is equal to initial adjusted onsite carbon stocks.
5	Baseline Onsite Carbon Stocks	1,853,549	Baseline estimates of onsite carbon stocks are not affected by the confidence deduction. ($BC_{\text{onsite}, y}$)
6	Annual Increment in Baseline Onsite Stocks	0	Difference from prior reporting period ($\Delta BC_{\text{onsite}}$). In reporting period 1, prior reporting period stocks are assumed to be zero, so difference is equal to initial unadjusted) onsite carbon stocks.
7	Quantified GHG Reductions / Removals for Onsite Stocks	111,387	Row 4 minus row 6. ($\Delta AC_{\text{onsite}} - \Delta BC_{\text{onsite}}$)
Accounting for Carbon Stored in Wood Products			
8	Actual Wood Products In-use	0	Carbon stored long-term In-use, calculated from actual harvested carbon values. (Component of $AC_{\text{wp}, y}$)
9	Actual Wood Products Landfill	0	Carbon stored long-term in landfills, calculated from actual harvested carbon values. If actual harvest volumes for the reporting period(s) are less than baseline harvest volumes, then this value is included in $AC_{\text{wp}, y}$.

	Reporting Period	RP7	Notes
10	Actual Wood Products PDM	0	Based on actual carbon in standing live carbon stocks harvested in each reporting period(s), prior to delivery to mills (PDM). Used to calculate Secondary Effects.
11	Baseline Wood Products In-use	6,626	Carbon stored long-term In-use, calculated from averaged baseline carbon values. (Component of $BC_{wp, y}$).
12	Baseline Wood Products Landfill	4,250	Carbon stored long-term in landfills, calculated from averaged baseline carbon values. If actual harvest volumes for the reporting period is less than baseline harvest volumes, then this value is included in $BC_{wp, y}$.
13	Baseline Wood Products PDM	38,813	Based on carbon in standing live carbon stocks harvested each year in the baseline analysis, prior to delivery to mills (PDM). Used to calculate Secondary Effects.
14	Difference in Actual and Baseline Carbon Stored in Wood Products	-10,876	Difference between actual and baseline carbon stored long-term in wood products in each reporting period ($AC_{wp, y} - BC_{wp, y}$). May be negative.
15	Quantified GHG Reductions / Removals for Carbon Stored in Wood Products	-8,701	Equal to $(AC_{wp, y} - BC_{wp, y}) * 80\%$ (the Market Response Factor). May be negative.
Accounting for Secondary Effects			
16	PDM Difference	-38,813	The difference between the values in rows 10 and 13, above.
17	Secondary Effect Adjustment	-7,763	Either zero, if the value in row 15 is positive, or 20% of the value in row 16 if it is negative. (SE_y)
Calculation of Total Net GHG Reductions/Removals and Buffer Pool Contribution			
18	Negative Carryover from Prior Reporting Period	0	This is any negative amount from the prior reporting period's total net GHG reductions/removals that is not due to a reversal. (N_{y-1})
19	Total Net GHG Reductions/Removals	94,923	Equal to the sum of the values in rows 7, 15, 17, and 18. (QR_y)

	Reporting Period	RP7	Notes
20	Total ROCs Issued	94,923	Total number of ROCs that will be issued for quantified GHG reductions/removals, rounded to the nearest whole tonne.
21	Risk of Reversal	19.236%	Reversal Risk Rating from Table 6 above.
22	Required Buffer Pool Contribution	18,260	The number of ROCs that must be contributed to the Buffer Pool each reporting period, based on the risk of reversal. Calculated by multiplying the Total ROCs Issued (row 20) by the risk of reversal (row 21). Any remainder must be rounded to the nearest tonne.
23	ROCs Issued to the Project	76,663	Total ROCs issued to the Project in each reporting period. Equal to row 20 minus row 22.

Brushy Mountain Carbon Project Inventory Change Log

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