APPLICATION FOR LISTING AN IMPROVED FOREST MANAGEMENT U.S. FOREST OFFSET PROJECT

OPR Staff Use Only	**Date Application Received:**	**OPR Tracking Number:**	**Date Application Reviewed:**	*OPR Staff Use Only*

PART I. ENTITY APPLYING FOR LISTING

Is this form being submitted by the Offset Project Operator (OPO) or by the Authorized Project Designee (APD)?

Notes:
1. The person completing this form should be an OPO/APD employee.
2. If the APD is submitting this form, the OPO should submit the form *Designation of Authorized Project Designee* simultaneously.

☒ **OPO**
☐ **APD**

Name of Person Completing Form:	**Organization, if applicable:**	
Jordan Golinkoff	The Conservation Fund	
Date Form Completed:	**Phone Number:**	**Email Address:**
12/18/2014	202-423-5089	jgolinkoff@conservationfund.org

PART II. OFFSET PROJECT INFORMATION

Offset Project Name:
The Gualala River Forest - ARB

Offset Project Commencement Date:	**First Reporting Period Start Date:**	**First Reporting Period End Date:**
December 22nd, 2003	January 1st, 2015	May 31st, 2016

Provide an explanation and justification for the commencement date. Specify the action(s) that identify the offset project commencement date.
The start date of the Gualala River Project is the date when the original forest owner - Coastal Ridges, LLC - purchased the Gualala River Property.

PART III. OPO/APD INFORMATION

A. OPO

OPO Name:			**OPO's CITSS ID#:**
The Conservation Fund			CA 1 5 9 7
Mailing Address:	**City:**	**State:**	**Zip:**
1655 N. Fort Myer Drive, Suite 1300	Arlington	VA	22209
Contact Person:	**Phone Number:**	**Email Address:**	
Jordan Golinkoff	202-423-5089	jgolinkoff@conservationfund.org	

B. APD (if applicable)

☒ **No APD/Not Applicable**

APD Name:			**APD's CITSS ID#:**
			CA _ _ _ _
Mailing Address:	**City:**	**State:**	**Zip:**
Contact Person:	**Phone Number:**	**Email Address:**	

PART IV. LAND OWNERSHIP

A. Is the Offset Project Operator (OPO) the owner in fee for the Project Area?
Further documentation is required for all projects. Submit as attachment labeled "Attachment A." See Part X of this listing document for more information.
If "no," explain how the entity identified as the OPO has the right to undertake and list the project.

☒ **Yes**
☐ **No**

Submit the information in this form to the appropriate Offset Project Registry

B. List all Forest Owners. This includes owners in fee as well as third parties with existing property interests within the Project Area that affect the trees and standing timber located in the Project Area (e.g. mineral rights, timber rights, easements, rights of way, leases, etc.).

The Conservation Fund is the Forest Owner. See section VIII B. 6 for a discussion of conservation easements and other restrictions affecting the GUAL.

C. Does the offset project occur on public or private lands?
If the project occurs on public lands, proceed to questions C1 and C2. Otherwise, skip to question D.
Further documentation is required if project occurs on public lands. Submit as attachment labeled "Attachment B."
See Part X of this listing document for more information.

☒ **Private**
☐ **Public**

1. Describe the public process that has been used to approve forest management activities and baseline.

2. Describe the documentation being submitted with this listing document demonstrating approval of planned forest management activities and baseline.

D. Will the project employ a Qualified Conservation Easement (QCE)?
If employing a QCE, proceed to questions D1, D2, and D3. Otherwise, skip to question E.
Supporting documentation for a QCE is required. Submit as attachment labeled "Attachment C."
See Part X of this listing document for more information.

☐ **QCE**
☐ **Public Ownership**

1. Date that the QCE was or will be recorded.

2. Will the project take place in a state that requires third-party beneficiaries to sign the easement (i.e., to "accept and record that acceptance"), such as Arizona, Pennsylvania, or West Virginia?

☐ **Yes**
☐ **No**

3. Provide the terms within the easement that affect forest management.

E. Does the offset project occur on any of the following categories of land? (check all that apply)

☐ **Land that is owned by, or subject to, an ownership of possessory interest of a Tribe**
☐ **Land that is "Indian lands" of a Tribe as defined by 25 U.S.C. §81(a)(1)**
☐ **Land that is owned by any person, entity, or Tribe, within the external borders of such Indian lands**
☒ **None of the above**

If "none of the above," skip to Part V. Otherwise, proceed to questions E1 and E2.
Further documentation is required for projects occurring on land listed in the first three categories. Submit supporting documents as attachments labeled "Attachment D." See Part X of this listing document for more information.

1. Does a limited waiver of sovereign immunity between ARB and the governing body of the Tribe exist?

☐ **Yes**
☐ **No**

2. Describe how the land within the Project Area is owned.

PART V. OFFSET PROJECT AREA

Maps depicting specific elements of the Project Area are required for all projects. Submit supporting documentation as attachments labeled "Attachment E." See Part X of this listing document for more information.

Latitude of Offset Project Location:	Longitude of Offset Project Location:	Project Area Total Acreage:
38.81911	-123.41304	13,913

A. Identify the assessment area (or assessment areas, if project crosses more than one) that contain Project Area lands and list the acreage of project lands within each assessment area.

The Gualala River Forest (GUAL) consists of both the Coast Redwood / Douglas-fir Mixed Conifer (CRDFMC) assessment area and the Northern California Coast Mixed Oak Woodland (NCCMOW) assessment area. The CRDFMC is 11,976 acres of the total GUAL (88% of the area) and the NCCMOW is 1,837 acres (12% of the area). These assessment area acreages were calculated based on the California Wildlife Habitat Relationship Types Life Form criterion. Conifer forest (WHR_CON) and Mixed Forest (WHR_MIX) were considered part of the CRDFMC assessment area. Hardwood forest (WHR_HDW) was considered part of the NCCMOW assessment area. Herbaceous (WHR_HEB), Shrubs (WHR_SHB), and non-forested areas (WHR_NFO) were 100 acres (<1% of the area) and not considered as part of the common practice calculation.

B. Identify the governing jurisdiction(s) applicable to the Project Area.

The project is located in Mendocino County, CA.

C. Describe how the Project Area was determined.

The project area is the full extent of property purchased by The Conservation Fund in December, 2011. The acreage is based on the GIS shapefile seen in Attachment E.

D. Describe the existing land cover, and land use of the Project Area.

The GUAL is predominantly timberland with small areas of brush, grass, and rock outcroppings. The property is zoned for Timber Production

E. Describe the forest vegetation types within the Project Area boundary.

The GUAL is made up of mostly Redwood / Douglas-fir / Tanoak trees. There are also mixed oak woodlands and grasslands within the project area boundary.

F. Describe the site classes within the Project Area boundary.

The full GUAL property is low site productivity (RW site class 3 or greater). The site classes are based on the SSURGO soil data collected by the National Cooperative Soil Survey.

G. Describe the land pressures and climate zone/classification applicable to the Project Area.

The primary land pressures within the project vicinity are vineyard development and subdivision for second home development and hobby ranches. The GUAL is part of a forested watershed with a coastally influenced climate in the lower half of the drainage. Located within the Oregonian Biotic Province, the watershed has a Mediterranean climate, characterized by a pattern of low-intensity rainfall in the winter and cool, dry summers with coastal fog. Mean annual precipitation is 30 inches at the coast and up to 100 inches per year on the inland peaks. 90% of this precipitation generally falls as rain between October and April with the highest average precipitation in January.

H. Describe the historical land uses, current zoning, and projected land use within the Project Area and surrounding areas.

The property has a history of forest management that has resulted in the current forest conditions, which can be characterized as a young redwood Douglas-fir forest with a high component of tanoak. Compared to pre-settlement conditions, the forest is relatively young, structurally simplified, and contains a relatively high density of hardwoods. Almost all of the old growth was logged in the 1960's, with ground-based harvesting practices that were damaging to streams. Subsequent harvests removed all the residual old growth and most of the large second-growth. The project is currently zoned as a Timber Production Zone (TPZ). Future land use in this forest area will continue to be forest management.

I. Describe generally the forest conditions within the Project Area, including species composition, age class distribution, and management history.

The GUAL is a 13,546 acre forest located in Mendocino County, CA east of Point Area, CA and west of Boonville, CA. In the 1980s and 1990s, the majority of the property was harvested using aggressive selection techniques, often resulting in young stands (30 to 60 years old) with heavy competition from tanoak. The forest conditions also vary based on aspect, soils, and proximity to the coast, supporting both very productive redwood forest and dryer oak woodlands and grasslands.

PART VI. OFFSET PROJECT ELIGIBILITY

A. Does the project take place on land that has greater than 10 percent tree canopy cover? *Supporting documentation is required. Submit as attachment labeled "Attachment F." See Part X of this listing document for more information.*	☒ **Yes** ☐ **No**
B. Indicate how the offset project meets (or will meet) the definition of Natural Forest Management per Table 3.2 in the Compliance Offset Protocol US Forest Offset Projects, October 20, 2011:	
1. Native species: **a) Will the project consist of at least 95% native species based on the estimated sum of carbon in the standing live carbon pool?** *If "no," proceed to question 1b. Otherwise, skip to question B2.*	☒ **Yes** ☐ **No**
b) Describe how the project will meet this requirement. (Improved Forest Management Projects will be assessed using estimates of basal area per acre.)	
2. Composition of native species: **a) Does the Project Area naturally consist of a mixed species distribution where no single species' prevalence, measured as the percent of basal area of all live trees in the Project Area, exceeds the percentage value of standing live carbon shown under the heading 'Species Diversity Index' in the Assessment Area Data File?** *If "no," proceed to questions 2b and 2c. Otherwise skip to question B3.*	☒ **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.	
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 will meet the requirement for sustainable management if commercial harvesting is either planned or ongoing 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). ☐ **Not applicable; no commercial harvesting is occurring within the Project Area.** ☒ **Third party certification under the Forest Stewardship Council, Sustainable Forestry Initiative, or Tree Farm System, whose certification standards require adherence to and verification of harvest levels which can be permanently sustained over time.** ☐ **Adherence to a renewable long-term management plan that demonstrates harvest levels which can be permanently sustained over time and that is sanctioned and monitored by a state or federal agency.** ☐ **Employ uneven-aged silvicultural practices and maintain canopy retention averaging at least 40% across the forest, as measured on any 20 acres within the entire forestland owned by the Forest Owner, including land within and outside of the Project Area (areas impacted by Significant Disturbance may be excluded from this test).**	
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 does meet this requirement? *If "no," proceed to question 3c. Otherwise, skip to question B4.*	☒ **Yes** ☐ **No**
c) Explain how the project intends to show continuous progress toward meeting this requirement within the next 25 years.	
4. Structural elements (standing and lying dead wood): **How will the project ensure that structural elements are retained in sufficient quantities throughout the project life?** Structural elements will be retained and recruited as would naturally occur in any forest. When timber harvesting occurs on this property, that harvesting will retain standing dead wood in the form of snags for wildlife trees. Tops will be left in woods during harvesting to increase down wood recruitment and no lying dead wood will be removed from the forest.	
C. Describe the management activities that will lead to increased carbon stocks in the Project Area, compared to the baseline. The forest management activities used on the GUAL will consist primarily of light-touch single tree selection. These harvesting approaches will generally leave more standing volume post harvest than is modeled in the baseline harvesting regimes.	
D. Is this project being implemented and conducted as the result of any law, statute, regulation, court order, or other legally binding mandate? **If "yes," explain:**	☐ **Yes** ☒ **No**
E. Will the offset project employ broadcast fertilization?	☐ **Yes** ☒ **No**
F. Does the offset project take place on land that was part of a previously listed and verified Forest Offset Project? *If "yes," proceed to questions E1 and E2. Otherwise, skip to Part VII.*	☒ **Yes** ☐ **No**
1. Was the previous Forest Offset Project terminated due to an Unintentional Reversal?	☐ **Yes** ☒ **No**
2. Is the project transitioning to the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011, after previously being listed as an early action offset project?	☒ **Yes** ☐ **No**

PART VII. CARBON STOCK INVENTORY

A. Provide a general description of the inventory methodology to be used to quantify carbon stocks for each required carbon pool in the forest project's offset boundary. The inventory methodology must describe the information required in Appendix A.3 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.

IFM-1 Standing Live:

Standing live and standing dead trees were sampled with a grid of fixed area plots using an unstratified systematic random sampling design. The cruise was based on a systematic sample of the ownership with nested plots installed on a square plot grid 25.4 chains on a side (1,675 feet). A 1/5th acre plot measured conifers 10.5" DBH and larger, conifers 3.5" DBH to 10.4" DBH and hardwoods 3.5" DBH and larger were measured on a 1/50th acre plot, and conifers and hardwoods less than 3.5" DBH were measured on a 1/250th acre plot.

IFM-3 Standing Dead:

see above

IFM-6 Soil (if applicable):

NA

IFM-7 Carbon in in-use forest products:

The carbon in in-use wood products will be accounted for following the protocol defined method found in Appendix C and table 5.2 of the ARB Forest Project Protocol.

IFM-8 Forest product carbon in landfills (if applicable):

The carbon in in-use wood products will be accounted for following the protocol defined method found in Appendix C and table 5.2 of the ARB Forest Project Protocol.

IFM- 9 Biological emissions from site preparation:

No site preparation is planned.

IFM-14 Biological emissions/removals from change in harvesting on forestland outside project area:

The biological emissions / removals from changes in harvesting on forestland outside of the project area will be accounted for following the protocol default factor of 20% (see table 5.2).

IFM-17 Biological emissions from decomposition of forest products:

IFM-17 will be accounted for following the guidance found in table 5.2 and is based on the calculations of carbon found in in-use wood products and landfills.

B. Describe the calculation methodologies to be used to determine metric tons per acre for each of the carbon pools included in the Offset Project Data Report.

IFM-1 Standing Live:

Standing live metric tons of carbon was calculated using the ARB approved PNW-FIA volume, equations combined with the approved biomass and carbon conversion factors. First, the total cubic volume of the above ground portion of the tree was calculated using the DBH and total tree height. Biomass was then calculated using the ARB approved density factors by tree species. Finally, carbon was calculated by applying the ARB approved biomass to carbon conversion factors by tree species.

IFM-3 Standing Dead:

Live Snags are dead trees that are merchantable and still have leaves and branches. These trees had their carbon calculated in the same manner as the standing live trees. Snags are trees in a more advanced state of decay and these trees had their carbon calculated by first calculating their volume using their DBH and height. These trees were then converted to biomass by species and decay class using the default factors found in the Harmon et al (2008) publication noted in the compliance forestry offset protocol. Dead Snags are assumed to have no belowground carbon.

IFM-6 Soil (if applicable):

NA

IFM-7 Carbon in in-use forest products:

The carbon in in-use wood products will be accounted for following the protocol defined method found in Appendix C and table 5.2 of the ARB Forest Project Protocol.

IFM-8 Forest product carbon in landfills (if applicable):

The carbon in in-use wood products will be accounted for following the protocol defined method found in Appendix C and table 5.2 of the ARB Forest Project Protocol.

IFM- 9 Biological emissions from site preparation:

NA

IFM-14 Biological emissions/removals from change in harvesting on forestland outside project area:
The biological emissions / removals from changes in harvesting on forestland outside of the project area will be accounted for following the protocol default factor of 20% (see table 5.2).
IFM-17 Biological emissions from decomposition of forest products:
IFM-17 will be accounted for following the guidance found in table 5.2 and is based on the calculations of carbon found in in-use wood products and landfills.

C. Provide a summary of the inventory of carbon stocks for each carbon pool (or approach used, if inventory is not applicable).
IFM-1 Standing Live:
2,046,231 MtCO2e - see section VII.A. above.
IFM-3 Standing Dead:
17,565 MtCO2e - see section VII.A above.
IFM-6 Soil (if applicable):
NA
IFM-7 Carbon in in-use forest products:
0 MtCO2e - see section VII.A above.
IFM-8 Forest product carbon in landfills (if applicable):
0 MtCO2e - see section VII.A above.
IFM- 9 Biological emissions from site preparation:
0 MtCO2e - NA
IFM-14 Biological emissions/removals from change in harvesting on forestland outside project area:
-6,949 MtCO2e - see section VII.A above.
IFM-17 Biological emissions from decomposition of forest products:
0 MtCO2e - see section VII.A above.

D. Provide a summary of the estimated inventory confidence statistics.
The current inventory accuracy is more accurate than 5% at the 90% confidence level. We expect to achieve this level of inventory accuracy in future inventories as well.

E. Provide the calculation of the offset project's reversal risk rating and expected contribution to the Forest Buffer Account.
This property has two conservation easements on it however these easements are not considered qualified. Therefore, the Forest Buffer contribution will be 19.236%.

PART VIII. OFFSET PROJECT BASELINE

A. Required for ALL Improved Forest Management Projects

1. Describe the project's modeling plan, following the requirements and methods in Appendix B, Section B.3 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
The CARB COPUSFP requires that all forest projects model the baseline business as usual carbon stored over a 100 year period. To estimate the project additionality, a baseline management regime that conforms to the California Forest Practice Rules (CA FPR) Option C language is modeled and is subtracted from the measured project activity on a yearly basis. The difference between these two regimes is an estimate of the additional carbon that exists as a result of the forest owner's management actions.
Before modeling the management activities in a given area, an accurate representation of the size of buffers based on the laws governing forest management is needed. The California Forest Practice Rules (CA FPR) define the buffer area (linear distance from objects) requirements in terms of silvicultural limitations, which may be based on retention standards defined by either basal area or canopy cover retention, or disallowing any harvest. The CA FPR mandates that streams, certain rare and endangered species, and areas that are highly sensitive to erosion be buffered so as to reduce the potential impact of forest management activities on riparian areas and sensitive species.
The baseline model was constructed to be a financially feasible approach to management that was legal under all relevant laws, rules, and regulations. The growth and yield modeling was done using the approved FORESEE growth and yield model (see section 5 in the PDD for more

details).

2. Describe and estimate the project's baseline onsite carbon stocks. Explain any annual changes in baseline carbon stocks over time.

The attached graph shows the final baseline incorporating above and below ground standing live carbon stocks and standing dead carbon stocks. Because the starting stocks are below the common practice stocking for this assessment area (ARB Common Practice = 157.44 MtCO2e/acre vs. Gualala Starting Stocks = 128.97 MtCO2e/acre), the minimum baseline level is based on the High Stocking Reference, the common practice indicator, and an analysis of carbon stocks on other forest lands owned by the same owner in the same management unit. The High Stocking Reference does not apply in this case as the project operator did not own this property prior to the project start date. Furthermore, at the time of the project start, the project area was not owned by The Conservation Fund and the owner at that time did not own any other land within the same logical management unit. Therefore, the weighted carbon stock value was the same as the initial project carbon stocks. Based on this analysis, the minimum baseline level is the initial carbon stocks (based on equation 6.6 in the forest protocol) = 128.97 MtCO2e/acre. The property has been broken into three separate areas for modeling purposes: no cut acres, watercourse and lake protection zones (WLPZ) and unconstrained harvest acres. To calculate the total baseline, all three areas are combined and the standing dead pool is added as well. The solid, thick purple line shows the final baseline model and the thin horizontal purple line is the 100-year average of this modeled baseline. The baseline modeling in the no harvest acres and the WLPZ acres shows steady growth of stocks over time. The unconstrained harvest shows an initial rapid decline in stocks followed by more steady growth due to the initial harvest and hardwood management silviculture

A graph portraying the baseline onsite carbon stocks, labeled "Attachment G," and a diagram of the baseline incorporating all required carbon stocks, labeled "Attachment H," are required. See Part X of this listing document for more information.

3. Identify the approved growth model that will be used for the project.

FORESEE

4. Harvest Planning

a. Is harvesting planned in the Project Area? *If "yes," proceed to question 4b. Otherwise, skip to question A5.*	☒ **Yes** ☐ **No**
b. Will the project use a harvest schedule model? *If "yes," proceed to question 4c. Otherwise, skip to question A5.*	☐ **Yes** ☒ **No**

c. How do you plan to address age class and stratification as part of your harvest scheduling?

5. Provide an estimate of carbon that will be stored long-term in harvested wood products in the baseline.

Over the full 100 year baseline approximately 6,090 metric tons of carbon will be stored in harvested wood products and landfills. Accounting for leakage effects, only 80% of this (4872 mtCO2e) will be added to the baseline.

B. Required for Improved Forest Management Projects on Private Lands ONLY

1. Provide the estimated initial above ground standing live carbon stock per acre for the project, if known.

128.97 MtCO2e/acre above ground live stocks

2. Provide the estimated adjusted above ground standing live carb stock per acre, if known.

128.97 MtCO2e/acre above ground live stocks

3. Provide the Common Practice statistic associated with the Project Area.

157.44 MtCO2e/acre

4. Are the Project Area's initial above-ground standing live carbon stocks per acre above or below Common Practice?
If below Common Practice, what is the High Stocking Reference for the Project Area?

Because the project commencement date is the date the original project developer took ownership of the GUAL, the high stocking reference for the project area are the starting stocks.

☐ **Above**
☒ **Below**

Further documentation is required if project below Common Practice. Submit supporting documents as attachments labeled "Attachment I." See Part X of this listing document for more information.	
5. Does the Forest Owner(s) and its affiliate(s) own land in fee or hold timber rights on land outside the Project Area? *If "no," skip to question B.6.*	☒ **Yes** ☐ **No**
If "yes" does the Protocol require the use of a weighted average carbon stock on lands in the same Logical Management Unit (LMU, as defined in Section 6.2.1.1)? *If "no," skip to question B.6.*	☐ **Yes** ☒ **No**
If "yes," is inventory data available for the LMU or will the OPO use a stratified vegetation analysis?	☐ **Data available for LMU** ☐ **Stratified Vegetation Analysis**

6. Provide a general description of the legal constraints affecting forest management activities in the Project Area; include a description of each constraint (referring to Section 6.2.1.2 in the Protocol) as well as a narrative those constraints have on forest management.

There are several legal constraints that affect forest management for the GUAL. Most importantly, the CA Forest Practice Rules (CA FPR) govern how forests in this region can be managed. These rules limit harvests within stream zones and specify what types of management may be applied to different types of forests. More broadly, the federal Endangered Species Act compels forest landowners to take steps to protect endangered species and for the Garcia that means restricting harvest around Northern Spotted Owl nesting sites. The CA state Endgandered Species Act also protects and preserves native species and their habitats.

The GUAL is subject to two conservation easements held by The Nature Conservancy. Both conservation easements were recorded after the project commencement date and therefore do not affect the baseline modeling.

7. Provide a description of the modeling techniques used to simulate the effects of the constraint.

The GUAL uses spatially explicit modeling of forest stands to separately model constrained and unconstrained harvestable acres. The unconstrained harvestable acres fall outside of any stream zones and do not impact any endangered species. These areas can be managed to produce the highest volume of timber under the CA Forest Practice Rules. Constrained areas that can be harvested include some portions of the stream zones and these areas were modeled separately using a light-touch silviculture to meet the requirements of the CA FPR. Lastly, areas that were unable to be harvested due to legal constraints based on the CA FPR or endangered species were grown forward with no mangement.

8. How will the OPO demonstrate financial feasibility of the growth and harvesting regime assumed for the baseline? (check one of the boxes)

☒ **Conducting a financial analysis of the anticipated growth and harvesting regime that captures all relevant costs and returns, taking into consideration all legal, physical, and biological constraints, using regional norms or documented costs and returns for the project area or other properties in the Forest Project's Assessment Area**

☐ **Providing evidence that activities similar to the proposed baseline growth and harvesting regime have taken place on other properties within the Forest Project's Assessment Area within the past 15 years**

C. Required for Improved Forest Management Projects on Public Lands ONLY

1. Has an initial forest carbon inventory been conducted for the Project Area?	☐ **Yes** ☐ **No**
2. Provide a projection of future changes to Project Area forest carbon stocks extrapolating from historical trends.	
3. Explain how current public policy will affect onsite carbon stocks and how the baseline modeling incorporates constraints imposed by all applicable statutes, regulations, policies, plans, and activity-based funding.	
4. Have carbon stocks in the Project Area been increasing or declining over the preceding ten-year period?	☐ **Increasing** ☐ **Declining**

PART IX. ADDITIONAL QUESTIONS

A. Have any lands within the Project Area ever been listed or registered with an offset project registry or program in the past? *If "yes," identify the registry or program and provide details on the issued credits below.*	☒ **Yes** ☐ **No**
B. Have greenhouse gas emission reductions or removal enhancements associated with lands within the Project Area been credited or claimed for the purpose of greenhouse gas mitigation or reduction goals, whether in a voluntary or regulatory context? *If "yes," identify the registry or program and provide details on the issued credits below.*	☒ **Yes** ☐ **No**

Registry/Program:	**Reporting Period(s):**	**Vintage(s):**	**Number of Credits Issued:**
Climate Action Reserve	2004 to 2014	2004 to 2014	499,190 (through 2013)

PART X. ATTACHMENTS

A. If the answer to Part IV.A is "yes," provide documentation (e.g., deed of trust, title report, etc.) showing the OPO's ownership interest in the property and its interest in the trees and standing timber on the property.
If the answer to Part IV.A is "no," provide documentation supporting the explanation of the OPO's right to undertake and list the project.

B. If the answer to Part IV.C is "public," provide documentation demonstrating explicit approval of the offset project's management activities and baseline including any public vetting processes necessary to evaluate management and policy decisions concerning the offset project. ☒ **N/A**

C. If a Qualified Conservation Easement (QCE) has been recorded, provide a copy. The listing information contained in this form and the documents attached to it will eventually be submitted to ARB so submitting a copy of the QCE as an attachment to this listing document fulfills the requirement in 9.1.1.1(18)(a) of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 to provide ARB with a copy. ☒ **N/A**

D. If the project is located on one of the categories of Tribal land listed in Part IV.E, provide documentation demonstrating that the land within the Project Area is owned by a tribe or private entity. Also provide documentation that demonstrates the existence of a limited waiver of sovereign immunity between ARB and the governing body of the Tribe entered into pursuant to section 95975(l) of the Cap-and-Trade Regulation. ☒ **N/A**

E. Attach map(s) of the Project Area including:
1. **Public and private roads**
2. **Towns**
3. **Major watercourses (4th order or greater), water bodies, and watersheds**
4. **Topography**
5. **Townships, ranges, and sections or latitude and longitude**
6. **Existing land cover and land use (optional)**
7. **Forest vegetation types (optional)**
8. **Site classes (optional)**
9. **Land pressures and climate zone/classification (optional)**
10. **Historical land uses, current zoning, and projected land use within the Project Area (optional)**
11. **A georeferenced shape file (or other electronic file that can be read in a geographic information system) that clearly identifies the Project Area and boundaries.** *Note that the georeferenced shape file may constitute the required map if it includes the required map information listed above.*

F. Provide supporting documentation demonstrating that the offset project takes places on land that has greater than 10 percent tree canopy cover.

G. Attach a graph portraying the baseline onsite carbon stocks with time depicted on the x-axis and metric tons CO_2e depicted on the y-axis.

H. Attach a diagram of the baseline incorporating all required carbon stocks.

I. For projects on <u>private lands ONLY</u>: If the Project Area's initial above-ground standing live carbon stocks are below Common Practice, submit an affidavit testifying that the inventory depicted over the past 10 years (used to determine the High Stocking Reference for the Project Area) is reasonably accurate and a summary of volume harvested over the past 10 years. ☐ **N/A**

PART XI. ATTESTATIONS AND OPO SIGNATURE

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:		Crediting Period Start Date:		Crediting Period End Date:
Gualala River Forest	**from**	**1/1/2015**	**to**	**12/31/2039**

Submit the information in this form to the appropriate Offset Project Registry

Initial	**will be measured in accordance with the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011, and all information required to be submitted to ARB is true, accurate, and complete.**
Initial	**I understand I am voluntarily participating in the California Greenhouse Gas Cap-and-Trade Program under title 17, article 5, and by doing so, I am now subject to all regulatory requirements and enforcement mechanisms of this program and subject myself to the jurisdiction of California as the exclusive venue to resolve any and all disputes arising from the enforcement of provisions in this article.**
Initial	**I understand that the offset project activity and implementation of the offset project must be in accordance with all applicable local, regional, and national environmental and health and safety laws and regulations that apply to the offset project location. I understand that offset projects are not eligible to receive ARB or registry offset credits for GHG reductions and GHG removal enhancements that are not in compliance with the requirements of the cap-and-trade program.**

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 an Account Representative of the Offset Project Operator (OPO).

SIGNATURE: Digitally signed by Jordan Golinkoff Date: 2014.12.18 16:40:39 -08'00'	**PRINTED NAME:** Jordan Golinkoff
TITLE: Forest Carbon Analyst	**DATE:** 12/18/2014

Submit the information in this form to the appropriate Offset Project Registry

Background for Application of Listing an Improved Forest Management U.S. Forest Offset Project

Section 95975 of the Cap-and-Trade Regulation describes the requirements and process for an Offset Project Operator (OPO) or Authorized Project Designee (APD) to list an offset project with an approved Offset Project Registry. This form is designed to help an OPO or APD fulfill the requirements of Section 95975 of the Cap-and-Trade Regulation and of Section 9.1.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011, for listing an offset project. The Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 designates three project types: Avoided Conversion, Improved Forest Management, and Reforestation. This form is designed for Improved Forest Management projects only. The information in the completed form should be submitted to the approved Offset Project Registry with which the OPO or APD would like their offset project listed.

Where to Submit Information Contained in This Form

Please complete the information on the form using your computer. Then print, sign, and scan the form. The completed and signed information and all supporting documentation should be submitted to the appropriate Offset Project Registry.

Copies of this form can be downloaded from the ARB website at:
http://www.arb.ca.gov/cc/capandtrade/offsets/forms/forms.htm

Detailed Instructions for Application for Listing an Improved Forest Management U.S. Forest Offset Project

Part I. Entity Applying for Listing:

- Indicate whether the Offset Project Operator (OPO) or Authorized Project Designee (APD) is submitting the information for project listing. Section 95975(a) of the Cap-and-Trade Regulation requires that the OPO and, if applicable, the APD must register with ARB for the Cap-and-Trade Program prior to listing a project. It also requires that neither the OPO nor APD be subject to any Holding Account restrictions imposed as part of an enforcement action. To register with ARB, please visit the website for Compliance Instrument Tracking System Services (CITSS): https://www.wci-citss.org/
- List the name, organization, phone number, and email address of the person submitting the information. This person should be an employee of the OPO or APD, whichever entity is making the submission. The person submitting the information need not be the same person as the contact person listed for the OPO or APD in Part III and also need not be the person signing the form in Part XI.
- The person submitting the information should indicate the date the form is completed.

Part II. Offset Project Information:

- Provide the name for the offset project. Indicate the offset project commencement date and the start and end dates of the first reporting period; approximations are acceptable if precise dates are unknown.
- Project commencement for an Improved Forest Management Project must be linked to a discrete, verifiable action that delineates a change in practice that increases sequestration and/or decreases emissions relative to the forest project's baseline. This date could be when the Project Area is transferred to public ownership, when a conservation easement on the Project Area is recorded, or when submitting the offset project listing information.

Part III. OPO/APD Information:

- Enter contact information for the OPO and APD requesting the offset project listing. Every offset project will have an OPO. If an offset project does not have an APD, please mark the box indicating the Offset Project does not have an APD and leave the remaining fields blank.
- For both the OPO and, if applicable, the APD, enter the entity's name, its mailing address, and the name, phone number, and email address of a contact person for the entity. Also include its CITSS ID number. The CITSS ID is six characters in length, with two letters followed by four numbers (e.g., "CA1234"). **DO NOT PROVIDE THE CONFIDENTIAL CITSS ACCOUNT NUMBER**, which begins with the CITSS ID number followed by a hyphen and more numbers.

Part IV. Land Ownership:

- This part includes questions regarding land ownership and property interests.
- Further documentation is required based on the responses to some questions. See Part X of this listing form for more information on the precise requirements.

Part V. Offset Project Area:

- This part asks for qualitative descriptions of the offset Project Area.
- Maps are required to complement the descriptions provided in this part. See Part X of this listing form for more information on the precise requirements.
- The Project Area should be determined following the requirements of Section 4 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- Assessment areas shall be determined by referencing the Assessment Area Data File available at: http://www.arb.ca.gov/cc/capandtrade/protocols/usforestprojects.htm

Part VI. Offset Project Eligibility:

- The questions in this part are designed to facilitate the determination of project eligibility for Improved Forest Management Projects.
- Further documentation is required based on the responses to some questions. See Part X of this listing form for more information on the precise requirements.
- Details on the eligibility requirements for Improved Forest Management Projects can be found in Sections 2.1.2, 3.1, and 3.8 of the Compliance Offset Protocol U.S. Forest Project, October 20, 2011.
- Details on the Natural Forest Management criteria can be found in Table 3.2 in the Compliance Offset Protocol U.S. Forest Project, October 20, 2011.

Part VII. Carbon Stock Inventory:

- Projects are not required to have completed a full carbon stock inventory at the time of listing, but OPOs/APDs should be familiar with Appendix A and have a plan for how they will meet the requirements therein. Therefore, a general description of the project's inventory methods and procedures, consistent with the requirements in Appendix A.3, is required at the time of listing. ARB recognizes that some information provided will be preliminary and based on best estimates. If the project's inventory methodology changes between the time of listing and submission of the first OPDR, this should be reported as a change to the information submitted at project listing when submitting the first OPDR.
- Section 6.2 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 outlines the approved quantification methodologies for Improved Forest Management Projects. Further details on completing a forest project carbon inventory can be found in Appendix A of the Protocol.
- Follow the steps in Appendix D of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 to quantify the project's reversal risk rating.
- The project's expected contribution to the Forest Buffer Account is determined annually based upon the project's risk of reversal and is calculated by multiplying the project specific reversal risk rating by the total net GHG reductions/removals achieved by the project. An approximation of the contribution to the Forest Buffer Account is acceptable.

Part VIII. Offset Project Baseline:

- Projects are not required to have a finalized baseline at the time of listing, but OPOs/APDs should be familiar with Appendix B and have a plan for how they will meet the requirements therein. A complete modeling plan reflecting the requirements in Appendix B.3 is therefore required at the time of listing. ARB recognizes that some information provided will be preliminary or based on best estimates. If the project's modeling plan or baseline estimates change between the time of listing and submission of the first OPDR, this should be reported as a change to the information submitted at project listing when submitting the first OPDR.
- Note that IFM projects located on public land must present documentation demonstrating explicit approval of the offset project's management activities and baseline. These projects may report changes to the baseline within the initial OPDR if the changes have gone through a public review process and meet the Protocol requirements regarding explicit approval of the project's baseline.
- This part is divided into three sections: questions required for all Improved Forest Management Projects; questions for Improved Forest Management Projects on private lands; and questions for Improved Forest Management Projects on public lands. Answer the questions applicable to the project.
- Section 6.2 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 outlines the approved quantification methodologies for Improved Forest Management Projects. Instructions for

considering legal and financial constraints can be found in Sections 6.2.1.2 and 6.2.1.3, respectively. Further details on modeling carbon stocks can be found in Appendix B of the Protocol.

- ARB approved growth models can be found in Appendix B, Section B.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- When a requirement is not applicable to the project being listed, please select the "N/A" (Not Applicable) checkbox next to the requirement so that it is clear that the question was not inadvertently left unanswered.

Part IX. Additional Questions:

- Answer both questions. If the answer to either question is "yes," identify the registry or program and provide details on the issued credits in the space provided.

Part X. Attachments:

- Provide each attachment on a separate sheet of paper and submit along with the completed application for listing.
- To aid with tracking each attachment, it is recommended that the attachments are labeled to correspond with the letter in Part X that they refer to (e.g. "Attachment B").
- When an attachment is not applicable to the project being listed, please select the "N/A" (Not Applicable) checkbox next to the requirement so that it is clear that the attachment was not inadvertently left off.

Part XI. Attestations and OPO Signature:

- Section 95975(c) of the Cap-and-Trade Regulation requires three attestations for listing an offset project. The required attestations are provided in this section. Each attestation should be initialed by the person signing the form.
- The first attestation requires the applicant to provide the offset project name and the start and end dates of the crediting period to complete the statement. The offset project name should match the name entered in Part II. The dates for the offset project's crediting period must also be provided. Please note that the dates provided in the attestation are for the crediting period, not for the first reporting period provided in Part II. The crediting period dates may be approximate if precise dates are not known.
- Amendments adopted in April 2014 to section 95975(d) require the attestations "be provided to an Offset Project Registry with the listing information, if being listed with an Offset Project Registry."
- The individual signing the document must be registered in CITSS as the OPO's Primary Account Representative or Alternate Account Representative. The individual signing the document may be an APD employee and/or representative; but to sign the document, the individual must be an Account Representative on the OPO's CITSS account.
- Please provide the person's signature, printed name, corporate title, and date signed.

Please contact your Offset Project Registry with any questions.

Submit the information in this form to the appropriate Offset Project Registry