

U.S. FOREST OFFSET PROJECT DATA REPORT INITIAL REPORTING PERIOD - IMPROVED FOREST MANAGEMENT				
OPR Staff Use Only	Date Report Received:	OPR Tracking Number:	Date Report Reviewed:	OPR Staff Use Only
<i>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 year thereafter, submit only the information requested in the Annual Reporting form.</i>				
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
Name of Person Completing Form:		Organization, if applicable:		
Ryan Johns		Alma Land Company		
Date Form Completed:	Phone Number:	Email Address:		
02/19/2020	(606)-437-4091	rjohns@rossharrisgroup.com		
Report Version Number:	Date Report Submitted:			
Version 3.2	02/19/2020			
PART II. OFFSET PROJECT INFORMATION				
Offset Project Name:		OPR Project ID#:	ARB Project ID# (if known):	
Finite Carbon – Alma Land Company IFM		CAR1208	CAFR5308	
Offset Project Commencement Date:	First Reporting Period Start Date:	First Reporting Period End Date:		
10/04/2016	10/04/2016	10/03/2017		
Provide an explanation and justification for the commencement date. Specify the action(s) that identify the offset project commencement date. The project commencement date has been identified as October 04, 2016 denoted by transfer of property ownership. The OPO has submitted a copy of the recorded deeds as evidence of the date the property was transferred to the forest owner and its interest in the project area.				
Optional: Provide the nearest town/city to the Project Area: Hazard KY				
PART III. OPO/APD INFORMATION				
A. OPO				
OPO Name:			OPO's CITSS ID#:	
Alma Land Company			CA 2032	
Mailing Address:		City:	State:	Zip:
PO Box 279		Pikeville	KY	41502
Contact Person:	Phone Number:	Email Address:		
Ryan Johns	(606)-437-4091	rjohns@rossharrisgroup.com		
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:		
C. Technical Consultant (if applicable)			☐ No TC/Not Applicable	

Technical Consultant Name: Finite Carbon Corporation		TC's CITSS ID#: CA 1530	
Mailing Address: 435 Devon Park Drive, 700 Building		City: Wayne	State: PA
Contact Person: Sean Carney		Phone Number: 484-586-3080	Email Address: scarney@finitecarbon.com

PART IV. LAND OWNERSHIP	
A. Is the Offset Project Operator (OPO) the owner in fee for the Project Area? <i>Further documentation is required for all projects. Submit as attachment labeled "Attachment A." See Part X of this OPDR document for more information.</i> If "no," explain how the entity identified as the OPO has the right to undertake and list the project. Alma Land Company is one of the several brother/sister companies whose lands comprise the project area. They have been designated as the OPO by these companies: Appalachian Land Company, Bevins Branch Resources Inc, Burning Creek Marrowbone Land Company, Brushy Development Corporation, Berkeley Realty LLC, Millers Creek Land Corporation, Poplar Creek Development Corporation, and Triple J Land Corporation. Berkeley Realty holds a perpetual timber deed on lands owned by Triple H Realty and these lands are included in the project.	☐ Yes ☒ No
B. Optional: 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.). Alma Land Company, Appalachian Land Company, Bevins Branch Resources Inc, Burning Creek Marrowbone Land Company, Brushy Development Corporation, Berkeley Realty LLC, Millers Creek Land Corporation, Poplar Creek Development Corporation, Triple J Land Corporation, and Triple H Realty	
C. Does the offset project occur on public or private lands? <i>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 copies of documentation demonstrating explicit approval of the project's management activities and baseline, as well as the public vetting process used; attachment should be labeled "Attachment B." See Part X of this document for more information.</i>	☒ Private ☐ Public
1. Describe the public process that was used to evaluate the forest management activities and policy decisions concerning the offset project. N/A	
2. Describe the explicit approval process used by the public entity to initiate and maintain this offset project, including the offset project's management activities and baseline. N/A	
D. Does the project employ a Qualified Conservation Easement (QCE)? <i>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 document for more information.</i>	☐ QCE ☐ Public Ownership
1. Date that the QCE was recorded. N/A	
2. Optional: Is the project located 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. N/A	
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 <i>If "none of the above," skip to Part V. Otherwise, proceed to Optional 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 document for more information.</i>	
1. Optional: Does a limited waiver of sovereign immunity between ARB and the governing body of the Tribe exist?	☐ Yes ☐ No

2. Optional: Provide a description of land ownership within the Project Area.

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 document for more information.

Latitude of Offset Project Location:
37.589

Longitude of Offset Project Location:
- 82.637

Project Area Total Acreage:
23,909.2

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.

Final Project Acreage: 23,909.2

Supersection: Allegheny & North Cumberland Mountains – Assessment Areas: Cove Forest (129.19 ac.), Mixed Hardwoods (5,346.58 ac.), Northern Hardwoods (5,470.35 ac.), Oak-Hickory (8,712.43 ac.), Mixed Pine Hardwood (1,364.11 ac.)

Supersection: Eastern Broadleaf Forest Cumberland Plateau & Valley – Assessment Areas: Cove Forest (258.47 ac.) Lowland Hardwoods (501.42 ac.), Northern Hardwoods (958.94 ac.), Oak-Hickory (749.91 ac.), Valley Pine (417.79 ac.)

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

Commonwealth of Kentucky (Floyd, Breathitt, Martin, Magoffin, Pike, Letcher, Johnson, and Lawrence Counties)

Commonwealth of Tennessee (Bledsoe and Sequatchie Counties)

Commonwealth of West Virginia (Mingo County)

C. Describe how the Project Area was determined.

The project area was determined by delineating timberlands owned in fee simple by the forest owners or lands where the forest owners controlled the timber through perpetual timber deeds, all located in the Allegheny & North Cumberland Mountains and Eastern Broadleaf Forest Cumberland Plateau & Valley Supersections.

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

The Project Area is comprised of several large blocks of contiguous natural forest in Kentucky, West Virginia and Tennessee providing critical habitat for native flora and fauna.

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

The Project Area is located in Eastern Kentucky, Tennessee, and West Virginia. The forest vegetation within the Project Area boundary is predominately comprised of species such as red maple, red oak, yellow poplar, and other mixed hardwoods. There is also a small percentage of conifer species such as eastern white pine and eastern hemlock.

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

Within the Project Area, 99.9% of the area is considered "Low" site class (less than 120 cubic feet per acre of growth annually) based on the NRCS soils site productivity data with 0.1% considered "High" site class.

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

Land pressures include high threats of conversion for development and long-term liquidation harvests. The project lies in the 6a and 6b climate zones as shown on USDA Plant Hardiness Zone Maps.

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

The majority of the Project Area is second and third growth Eastern hardwood and conifer mix, the result of timbering and farming over a 175 year period. The project area is currently zoned as timberland. Future use of the property may consist of commercial forestry practices as well as recreation and hunting.

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

A majority of the forested acres within the Project Area are in ages greater than 20 years old.

A mix of hardwood and conifer species dominate the species composition and include eastern white pine, eastern hemlock, red maple, red/white oak, and other mixed conifers. There are no known diseases that may impact the project inventory. Most of the Project Area has been under some form of land management for the past 100 plus year. Currently, the Project Area applies extensive silviculture.

PART VI. OFFSET PROJECT ELIGIBILITY

A. Does the Project Area have a canopy cover that is greater than 10 percent?

Supporting documentation is required. Submit as attachment labeled "Attachment F." See Part X of this document for more information.

☒ **Yes**
☐ **No**

B. Optional: Are the associated project lands currently in compliance with all local, state, and federal regulatory requirements?

☒ **Yes**
☐ **No**

Optional: If no, provide an explanation of the non-compliance.

C. Does the entity submitting this report declare that the offset project has not and does not employ broadcast fertilization?

☒ **Yes**
☐ **No**

D. Indicate how the offset project meets the definition of Natural Forest Management per Table 3.2 in the U.S. Forest protocol:

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? Improved Forest Management Projects are assessed using estimates of basal area per acre.

If "no," proceed to question 1b. Otherwise, skip to question D2.

Species ID	Common Name	Native?	BA (sqft/ac)	Percent
621	Yellow-Poplar	Yes	17.38	16.61%
802	White Oak	Yes	11.19	10.70%
316	Red Maple	Yes	9.11	8.71%
531	American Beech	Yes	8.32	7.95%
261	Eastern Hemlock	Yes	6.12	5.85%
132	Virginia Pine	Yes	5.20	4.97%
318	Sugar Maple	Yes	4.95	4.73%
832	Chestnut Oak	Yes	4.78	4.57%
837	Black Oak	Yes	3.05	2.92%
833	Northern Red Oak	Yes	3.00	2.87%
711	Sourwood	Yes	2.87	2.74%
806	Scarlet Oak	Yes	2.72	2.60%
403	Pignut Hickory	Yes	2.37	2.27%
372	Sweet Birch	Yes	2.29	2.19%
541	White Ash	Yes	2.05	1.96%
731	Sycamore	Yes	1.97	1.88%
409	Mockernut Hickory	Yes	1.80	1.72%
951	American Basswood	Yes	1.73	1.65%
693	Blackgum	Yes	1.35	1.29%
651	Cucumbertree	Yes	1.14	1.09%
126	Pitch Pine	Yes	1.07	1.02%
471	Eastern Redbud	Yes	1.04	0.99%
901	Black Locust	Yes	1.02	0.98%
931	Sassafras	Yes	0.98	0.94%
602	Black Walnut	Yes	0.87	0.83%
313	Boxelder	Yes	0.82	0.78%
407	Shagbark Hickory	Yes	0.78	0.75%
491	Flowering Dogwood	Yes	0.68	0.65%
972	American Elm	Yes	0.50	0.48%

☒ **Yes**
☐ **No**

341	Ailanthus	No	0.49	0.47%
701	E. Hophornbeam	Yes	0.37	0.35%
591	American Holly	Yes	0.28	0.27%
650	Magnolia Spp.	Yes	0.22	0.21%
740	Cottonwood/Poplar Spp.	Yes	0.19	0.18%
975	Slippery Elm	Yes	0.19	0.18%
402	Bitternut Hickory	Yes	0.17	0.16%
762	Black Cherry	Yes	0.17	0.16%
611	Sweetgum	Yes	0.16	0.15%
999	Other	Yes	0.16	0.15%
332	Yellow Buckeye	Yes	0.14	0.13%
743	Bigtooth Aspen	Yes	0.14	0.13%
712	Paulownia, Empresstree	No	0.12	0.11%
129	Eastern White Pine	Yes	0.10	0.10%
367	Pawpaw	Yes	0.10	0.10%
68	Eastern Redcedar	Yes	0.08	0.08%
812	Southern Red Oak	Yes	0.06	0.06%
761	Pin Cherry	Yes	0.06	0.06%
970	Elm Spp.	yes	0.05	0.05%
345	Mimosa, Silktree	No	0.04	0.04%
356	Serviceberry Spp.	Yes	0.04	0.04%
682	Red Mulberry	Yes	0.04	0.04%
601	Butternut	Yes	0.02	0.02%
421	American Chestnut	Yes	0.02	0.02%
391	Am Hornbeam, Muscledwood	Yes	0.02	0.02%
373	River Birch	Yes	0.01	0.01%
826	Chinkapin Oak	Yes	0.01	0.01%
521	Common Persimmon	Yes	0.01	0.01%
Total				
Native			103.14	98.59%
Total			104.61	100.00%

b) Describe how the project will meet this requirement.

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?**

Strata: CF (Cove Forest)

Allegheny & North Cumberland Mountains Cove Forests: SDI=70%

Eastern Broadleaf Forest Cumberland Plateau & Valley Cove Forests: SDI= 65%

Species ID	Common Name	BA (sqft/ac)	Percent
621	Yellow-Poplar	33.99	27.16%
261	Eastern Hemlock	30.56	24.41%
132	Virginia Pine	21.45	17.13%
316	Red Maple	11.23	8.97%
802	White Oak	5.99	4.79%
531	American Beech	4.57	3.65%
602	Black Walnut	3.73	2.98%
711	Sourwood	2.79	2.22%
318	Sugar Maple	2.29	1.83%
471	Eastern Redbud	1.92	1.54%
806	Scarlet Oak	1.72	1.38%
951	American Basswood	1.41	1.13%
591	American Holly	1.26	1.01%
701	E. Hophornbeam	1.12	0.90%
651	Cucumbertree	0.52	0.41%

☒ **Yes**
☐ **No**

541	White Ash	0.33	0.26%
812	Southern Red Oak	0.30	0.24%
Total		125.18	100.00%

Strata: MH (Mixed Hardwoods)

Allegheny & North Cumberland Mountains Mixed Hardwoods: SDI=70%

Eastern Broadleaf Forest Cumberland Plateau & Valley Lowland Hardwoods: SDI= 65%

Species ID	Common Name	BA (sqft/ac)	Percent
621	Yellow-Poplar	19.22	21.55%
731	Sycamore	9.48	10.63%
316	Red Maple	7.29	8.17%
802	White Oak	6.30	7.06%
931	Sassafras	3.68	4.13%
901	Black Locust	3.64	4.08%
313	Boxelder	3.40	3.81%
541	White Ash	3.39	3.80%
372	Sweet Birch	2.68	3.01%
318	Sugar Maple	2.44	2.74%
531	American Beech	2.32	2.61%
832	Chestnut Oak	2.21	2.48%
711	Sourwood	1.98	2.23%
972	American Elm	1.98	2.23%
132	Virginia Pine	1.88	2.11%
837	Black Oak	1.67	1.87%
693	Blackgum	1.50	1.68%
491	Flowering Dogwood	1.31	1.47%
740	Cottonwood/Poplar Spp.	0.96	1.08%
471	Eastern Redbud	0.93	1.05%
341	Ailanthus	0.92	1.03%
833	Northern Red Oak	0.88	0.99%
975	Slippery Elm	0.84	0.94%
611	Sweetgum	0.79	0.89%
409	Mockernut Hickory	0.79	0.89%
806	Scarlet Oak	0.79	0.88%
999	Other	0.67	0.75%
650	Magnolia Spp.	0.60	0.67%
403	Pignut Hickory	0.58	0.65%
951	American Basswood	0.56	0.62%
129	Eastern White Pine	0.48	0.54%
762	Black Cherry	0.46	0.51%
651	Cucumbertree	0.39	0.44%
761	Pin Cherry	0.31	0.35%
402	Bitternut Hickory	0.29	0.32%
126	Pitch Pine	0.25	0.28%
602	Black Walnut	0.25	0.28%
712	Paulownia, Empress tree	0.24	0.27%
682	Red Mulberry	0.21	0.23%
407	Shagbark Hickory	0.13	0.15%
601	Butternut	0.12	0.14%
421	American Chestnut	0.09	0.10%
743	Bigtooth Aspen	0.08	0.09%
356	Serviceberry Spp.	0.06	0.07%
701	E. Hophornbeam	0.06	0.07%
591	American Holly	0.05	0.05%
367	Pawpaw	0.01	0.02%

373	River Birch	0.00	0.00%
Total		89.18	100.00%

Strata: NH (Northern Hardwoods)

Allegheny & North Cumberland Mountains Northern Hardwoods: SDI=70%

Eastern Broadleaf Forest Cumberland Plateau & Valley Northern Hardwoods: SDI= 70%

Species ID	Common Name	BA (sqft/ac)	Percent
318	Sugar Maple	18.05	17.64%
621	Yellow-Poplar	14.75	14.41%
316	Red Maple	9.28	9.07%
802	White Oak	9.03	8.83%
531	American Beech	7.57	7.40%
951	American Basswood	6.08	5.94%
833	Northern Red Oak	5.19	5.07%
403	Pignut Hickory	4.89	4.78%
832	Chestnut Oak	4.42	4.32%
372	Sweet Birch	4.01	3.92%
651	Cucumbertree	2.47	2.41%
541	White Ash	2.39	2.33%
711	Sourwood	2.11	2.06%
407	Shagbark Hickory	1.50	1.47%
409	Mockernut Hickory	1.12	1.09%
471	Eastern Redbud	1.11	1.09%
693	Blackgum	1.07	1.04%
931	Sassafras	0.86	0.84%
901	Black Locust	0.78	0.76%
332	Yellow Buckeye	0.72	0.70%
806	Scarlet Oak	0.71	0.69%
341	Ailanthus	0.57	0.55%
972	American Elm	0.51	0.50%
837	Black Oak	0.49	0.48%
701	E. Hophornbeam	0.40	0.39%
762	Black Cherry	0.38	0.37%
402	Bitternut Hickory	0.36	0.35%
731	Sycamore	0.27	0.27%
712	Paulownia, Empresstree	0.25	0.25%
602	Black Walnut	0.25	0.24%
313	Boxelder	0.17	0.16%
999	Other	0.15	0.15%
491	Flowering Dogwood	0.13	0.13%
650	Magnolia Spp.	0.07	0.07%
126	Pitch Pine	0.06	0.05%
975	Slippery Elm	0.06	0.05%
373	River Birch	0.05	0.05%
367	Pawpaw	0.05	0.05%
356	Serviceberry Spp.	0.02	0.02%
682	Red Mulberry	0.01	0.01%
132	Virginia Pine	0.00	0.00%
Total		102.33	100.00%

Strata: OH (Oak-Hickory)

Allegheny & North Cumberland Mountains Oak-Hickory: SDI=65%

Eastern Broadleaf Forest Cumberland Plateau & Valley: SDI Oak-Hickory = 70%

Species ID	Common Name	BA (sqft/ac)	Percent
832	Chestnut Oak	17.09	14.80%

802	White Oak	12.63	10.94%
837	Black Oak	12.20	10.57%
806	Scarlet Oak	9.78	8.48%
621	Yellow-Poplar	7.78	6.74%
316	Red Maple	7.70	6.67%
409	Mockernut Hickory	7.09	6.14%
531	American Beech	6.74	5.84%
403	Pignut Hickory	6.38	5.53%
711	Sourwood	4.94	4.28%
833	Northern Red Oak	3.61	3.13%
693	Blackgum	3.07	2.66%
407	Shagbark Hickory	2.26	1.95%
372	Sweet Birch	1.95	1.69%
318	Sugar Maple	1.95	1.69%
541	White Ash	1.92	1.66%
651	Cucumbertree	1.41	1.22%
491	Flowering Dogwood	1.28	1.11%
126	Pitch Pine	1.25	1.09%
901	Black Locust	0.67	0.58%
743	Bigtooth Aspen	0.62	0.53%
471	Eastern Redbud	0.41	0.36%
951	American Basswood	0.39	0.34%
931	Sassafras	0.36	0.31%
341	Ailanthus	0.29	0.25%
701	E. Hophornbeam	0.26	0.22%
402	Bitternut Hickory	0.21	0.18%
132	Virginia Pine	0.20	0.18%
602	Black Walnut	0.15	0.13%
650	Magnolia Spp.	0.14	0.12%
356	Serviceberry Spp.	0.13	0.11%
391	Am Hornbeam, Muscledwood	0.12	0.11%
712	Paulownia, Empresstree	0.12	0.10%
731	Sycamore	0.09	0.08%
261	Eastern Hemlock	0.06	0.05%
975	Slippery Elm	0.04	0.04%
521	Common Persimmon	0.03	0.03%
367	Pawpaw	0.03	0.03%
826	Chinkapin Oak	0.03	0.03%
611	Sweetgum	0.01	0.01%
Total		115.40	100.00%

Strata: PN (Pine)

Allegheny & North Cumberland Mountains Mixed Pine-Hardwood: SDI=60%

Eastern Broadleaf Forest Cumberland Plateau & Valley Pine: SDI= 75%

Species ID	Common Name	BA (sqft/ac)	Percent
802	White Oak	22.01	24.20%
531	American Beech	20.38	22.41%
621	Yellow-Poplar	11.17	12.28%
316	Red Maple	10.04	11.04%
833	Northern Red Oak	5.32	5.85%
126	Pitch Pine	3.79	4.17%
372	Sweet Birch	2.78	3.06%
711	Sourwood	2.53	2.79%
132	Virginia Pine	2.45	2.70%
541	White Ash	2.22	2.44%

693	Blackgum	1.12	1.23%
651	Cucumbertree	0.91	1.00%
837	Black Oak	0.89	0.98%
471	Eastern Redbud	0.79	0.87%
341	Ailanthus	0.68	0.75%
491	Flowering Dogwood	0.67	0.73%
806	Scarlet Oak	0.57	0.63%
313	Boxelder	0.56	0.61%
367	Pawpaw	0.42	0.46%
068	Eastern Redcedar	0.40	0.44%
650	Magnolia Spp.	0.27	0.29%
970	Elm Spp.	0.25	0.28%
345	Mimosa, Silktree	0.21	0.23%
951	American Basswood	0.21	0.23%
832	Chestnut Oak	0.19	0.21%
591	American Holly	0.09	0.10%
682	Red Mulberry	0.00	0.00%
Total		90.94	100.00%

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 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).

- ☒ 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 meet this requirement?

☒ Yes
☐ No

If "no," proceed to question 3c. Otherwise, skip to question D4.

c) If the project does not meet the age class requirement at this time, explain how the project intends to demonstrate progress to meet this requirement over time; such that forest lands in ages less than 20 years old are reduced and make up no more than 40% of the Project Area.

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?

Currently there is no harvesting within the project area. If harvesting occurs in the future structural elements will be incorporated into management planning. The project will ensure that structural elements are retained in sufficient quantities throughout the project life by implementing project activities that do not include the active harvest or removal of standing or

lying dead wood.

E. Describe the management activities that will result in increased carbon stocks in the Project Area, compared to the baseline.

Currently no harvesting is occurring within the project area resulting in increasing carbon stocks with growth. If harvesting occurs in the future management activities that will lead to increased carbon stocks in the project area compared to the baseline include but are not limited to longer rotations with reduced harvest intensity. Longer rotations and greater retention will be used to gradually increase forest-wide stocking relative to a common practice baseline.

**F. 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

G. Does the offset project take place on land that was part of a previously listed and registered Forest Offset Project?
This question is applicable to both voluntary and compliance markets. If "yes" proceed to questions G1 and G2. Otherwise, skip to Part VII.

☐ Yes
☒ No

1. Optional: Was the previous Forest Offset Project terminated due to an Unintentional Reversal?

☐ Yes
☒ No

2. Optional: Has this project transitioned to the Compliance Offset Protocol U.S. Forest Projects after previously being listed as an early action offset project?

☐ Yes
☒ No

PART VII. CARBON STOCK INVENTORY

A. Provide a description of the inventory methodology 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 either the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 or the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014.

IFM-1 Standing Live:

1/15th acre fixed radius plots. All borderline trees were measured to the geometric center of the base of the tree using approved devices, including slope adjustments for slopes of 10% and greater in accordance with the USFS FIA procedures laid out in the National Core Field Guide (2014 edition). Species was recorded for all eligible stems. Eligible species codes from ARB's 2014 coefficients database were provided to each cruiser. All eligible living trees on the sample point were tallied to the nearest 0.1 inch DBH at the appropriate location (4.5' standard, diagrams for alternative DBH locations provided to cruisers from the National Core Field Guide) using steel loggers tapes. Diameter measurement heights were established on the uphill side of tallied trees. Height of each stem was measured with a laser hypsometer in one foot increments for all height measurements. Soundness deductions for any biomass and visible rot or cavities in the bole (including bark) were assessed on all trees. Deductions were made using the USDA "Percent volume allocation chart for soundness deductions" (USDA Forest Service Tech Note 347, 1943), provided to the cruisers with the inventory specifications.

IFM-3 Standing Dead:

Procedures are the same as above. However, standing dead trees were only be tallied if they were a minimum of 15 feet in total height. All tallied standing dead trees were visually evaluated and categorized in one of the following decay class status categories listed below: Standing Dead Tree Decay Class

- 1: All limbs and branches are present; the top of the crown is still present; all bark remains; sapwood is intact, with minimal decay; heartwood is sound and hard.

- 2: There are few limbs and no fine branches; the top may be broken; a variable amount of bark remains; sapwood is sloughing with advanced decay; heartwood is sound at base but beginning to decay in the outer part of the upper bole.
- 3: Only limb stubs exist; the top is broken; a variable amount of bark remains; sapwood is sloughing; heartwood has advanced decay in upper bole and is beginning at the base.
- 4: Few or no limb stubs remain; the top is broken; a variable amount of bark remains; sapwood is sloughing; heartwood has advanced decay at the base and is sloughing in the upper bole.
- 5: No evidence of branches remains; the top is broken; <20 percent of the bark remains; sapwood is gone; heartwood is sloughing throughout. Note: Cruisers were instructed to start with Class 5 with every standing dead tree. If the tree did not meet all qualities of that class, they moved upward in the scale until the most accurate designation was reached.

IFM-6 Soil (if applicable):

Excluded because the conditions in Table 5.2 that would require inclusion of this pool (deep ripping, furrowing, or plowing where soil disturbance exceeds 25% of the Project Area, or mechanical site preparation that is not conducted on contours) are not planned.

IFM-7 Carbon in in-use forest products:

For the Project, No harvesting occurred. For the Baseline, IFM-7 was modeled in accordance with Appendix B and calculated in accordance with Appendix C of the FOP. IFM

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

For the Project, No harvesting occurred. For the Baseline, IFM-8 was modeled in accordance with Appendix B and calculated in accordance with Appendix C of the FOP.

IFM- 9 Biological emissions from site preparation:

Site preparation is not expected to occur on more than 25% of the project area over the project life, nor is mechanical site preparation expected to be conducted on contours.

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

Estimated in the project using protocol default (i.e. 20%)

IFM-17 Biological emissions from decomposition of forest products:

Quantified as a component of calculating carbon stored for 100 years in wood products (SSR #IFM7) and landfills (SSR #IFM-8)

QA/QC

A local forestry firm was contracted by the TC to conduct joint and independent auditing on the project inventory. The contract auditor representatives worked cooperatively to ensure that the data quality meets the standards of the CA ARB program.

Auditing consisted of a minimum of 5% of samples collected. A final audit results summary was provided to the TC at the completion of the project, number of audited samples per cruiser including sample location identifiers, total audited samples vs. total samples as a percent, overall auditor's comments.

Audit results were based on a per cruiser assessment of plot tally on a percent error basis. Error was expressed as the number of errors divided by the number of trees sampled. Error types were weighted in a calculations table provided to the contractor and auditor. The maximum acceptable error threshold for accuracy is 1 error in 10 trees or 10%.

Corrective actions: Re-training non-compliant cruisers and correcting erroneous samples were the minimum corrective actions implemented.

Monitoring Plan (Inventory Updates & Data Management)

There are three major inputs for updating forest carbon stocks: activity data, emissions factors, and the confidence deduction.

Activity Data

Activity data is defined as the aerial extent of a land-use category. It is the “area data” in units of acres. In this case, land-use is stratified across the property in order to classify forest versus non-forest, and within forests, the forest type based on the dominant tree species or representative vegetative community, which were in turn matched with the Assessment Areas in the project Supersection (see Part V.A).

Activity data can change for several reasons including growth, timber harvests, natural disturbances and succession or selling property within the project area; these changes in activity data are collectively labeled as events. Events can affect the proportion of strata within the project area; however, the total aerial extent of the project area cannot change. For this project, activity data will be monitored and reported over time using spatially explicit datasets, also known as a Geographic Information System or GIS. On a continuous basis throughout the year, changes in activity data will be mapped, attributed and recorded by professional foresters during timber harvest operations and timber cruises. Changes will be submitted to and edited by the forest owner’s GIS controller. A collection of digital ortho photography is also used to update stand typing and plan timber cruises. Edits to the activity data will be compiled and delivered to the TC at the end of each reporting period. The TC will store and archive all activity data by year in the project’s geodatabase in the “stands” feature class, which will also serve as the activity data change log.

Emissions Factors

Emissions factors are defined as the emissions/removals of greenhouse gases per unit area. In this case, metric tons of CO₂ equivalents (tCO₂e) will be used to express emission factors as a result of changes in forest carbon stocks. Emission factors vary based on the category of activity data (i.e. strata) and are derived from forest inventory plots.

Forest inventory plots will be conducted according to the Sampling Methodology and processed by the TC using the data management and analytical system outlined in Part VII.B below. The forest owner will use permanent and temporary inventory plots as needed, to annually update the project’s forest carbon stocks. Measuring the same plots through time will reduce sampling variability and provide reliable estimates of actual growth through time. New temporary and/or permanent plots will be used where previous plots or CFI plots are not able to accurately represent a particular change in activity data. Inventory plots input to growth & yield modeling, as well as tracking harvest volumes, will be used to assess the changes in carbon stocks. No forest inventory plot data greater than 12-years old will be used.

Events

Events are activities that occur within the project area that affect activity data or emission factors. Events will require spatial and tabular updates to the carbon database. A list of events including spatial data and harvest volume summaries will be submitted by the Forest Owner to the TC at the end of each reporting period for the previous year and prepared for verification by completing a monitoring report.

1. Just Growth

Just growth events are assumed to occur in all areas of the project where no other event is assumed to occur. In this event, the activity data and emissions factors are updated by projecting inventory data using FVS growth and yield software, or with new plot data, assuming that accretion and mortality are only a function of the stand’s structure and condition from the previous reporting period. Furthermore, growth also occurs in other areas where other events take place, e.g. a timber harvest. In this case, the activity data and emissions factors are updated in the same fashion as just growth events, but accretion and mortality are adjusted based on the other event’s effects, e.g. timber harvesting will reduce the carbon stocking, but may increase growth rates while reducing mortality because crop trees are free to grow.

2. Land Sales

Land sales activity has a tremendous bearing on every carbon project. Should all or a portion of the area committed to the carbon project be sold while under the project's commitment terms, the TC will need to be notified as soon as possible. The Forest Owner will be required to provide digital mapping and possibly other documentation for the area affected by the sale. Please note that any Land Sales taking place on the Project Area will remain subject to the Forest Offset Protocol and Regulations, and therefore remain part of the Project. Should any portion of the Project Area be sold and wish to terminate the Project, the whole project will be considered terminated, as there is no provision which currently allows the Project Area to be divided into multiple projects. Once the Project Area for Improved Forest Management Projects has been verified, the Project Area cannot be changed for the duration of the Project's lifetime.

3. Natural Disturbances

Natural disturbance events can include wind storms, tornadoes, ice storms, floods, land-slides, earthquakes, insect or disease infestations, or other impacts of weather or nature on the forest carbon stocks. The TC must be notified immediately following an event of this type. The forest owner will be required to supply mapping of the damaged area, and in some cases, a re-inventory of the original sample locations affected by the event performed to the specifications attached.

4. Harvests and Land Use Conversions

IFM projects typically encounter planned timber harvests, thinning, clearing for roadways, log yards, decks, or other uses on a regular basis. When these events occur, the forest owner is required to provide the TC with a digital (GPS or GIS) polygon file of the affected area. If harvest activities affect permanent plots, a complete re-inventory of those samples affected by the action may be required. All points re-inventoried will conform to the original specifications and shall be freshly flagged and painted for relocation. The TC shall also be informed if the activity produces or is expected to produce a forest type conversion. See below for more information on stratification updates. If the conversion is to non-forest use, such as new road construction, these areas will be mapped and the correct adjustment to the project strata acreage and total carbon stocks will be made. All new inventory plot data should be submitted electronically in Excel or Access formats. All areas of timber harvest will be associated with a harvest volume summary.

Harvest volume summaries will be submitted to the project developer by species group (Hardwood/Softwood) and product (Sawtimber/Pulpwood), at a minimum. All harvest volume summaries must be verifiable from mill/contractor receipts (pay-as-cut sales) and/or prospectus cruises (lump-sum sales).

Post-harvest updates to project spatial data and the corresponding carbon stocks in those areas will be handled in one of two ways depending on the verification needs of the project for the current reporting period:

- For reporting periods subject to less-intensive verifications, updates to the project area stratification will be based on modeling the silvicultural activities in FVS. Treatments will be simulated based on the prescription provided by the forest owner (and following the requirements for using models to forecast carbon stocks established in Appendix B of the FOP). The end of reporting period carbon stocks in these areas will be calculated following the methodology outlined in Part VII.B. below. The resulting tCO₂e per acre will be allocated to the exact acreage treated based on the harvest polygons to allow for accurate carbon quantification across the project area for each reporting period.
- For reporting periods subject to full site visit verifications, the stratification across the project area will be updated to reflect the changes that have occurred during the previous six years.

On-going monitoring by the forest owner and its forest managers will ensure Unintentional Reversals will be reported to ARB and where necessary, an inventory of affected portions of the forest will be inventoried to account for unintentional reversals that create a need for ARBOC replacement from the Forest Buffer Account. Inventory design to account for losses from unintentional losses will depend on

the extent and intensity of the reversal should they occur.

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

IFM-1 Standing Live:

Standardized FIA cubic foot volume and biomass equations following the Component Ratio Method. Carbon was estimated as 50% of the dry biomass. Carbon was converted to CO₂e using 3.664. For more information see ARB's 2014 FOP, Appendix A.3.

IFM-3 Standing Dead:

The Domke et al. (2011) method as referenced on ARB's FOP website along with standardized FIA cubic foot volume and biomass equations following the Component Ratio Method. Carbon was estimated as 50% of the dry biomass. Carbon was converted to CO₂e using 3.664. For more information see ARB's 2014 FOP, Appendix A.3.

IFM-6 Soil (if applicable):

N/A, see Part VII. A above.

IFM-7 Carbon in in-use forest products:

Regional mill efficiencies and 100-year default storage factors. For more information see ARB's 2014 FOP, Appendix C.3.

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

Regional mill efficiencies and 100-year default storage factors. For more information see ARB's 2014 FOP, Appendix C.4.

IFM- 9 Biological emissions from site preparation:

N/A, see Part VII. A above.

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

Estimated in the project using protocol default (i.e. 20%).

IFM-17 Biological emissions from decomposition of forest products:

Quantified as a component of calculating carbon stored for 100 years in wood products (SSR #IFM7) and landfills (SSR #IFM-8).

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:

2,817,078.88

IFM-3 Standing Dead:

38,430.29

IFM-6 Soil (if applicable):

N/A, see Part A

IFM-7 Carbon in in-use forest products:

0

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

0

IFM- 9 Biological emissions from site preparation:

N/A, see Part VII. A above

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

(16,869)

IFM-17 Biological emissions from decomposition of forest products:

0

D. Provide a summary of inventory confidence statistics.

The confidence deductions for the project is 0%

Strata	Mean tCO ₂ e	Percent Error (PE)
CF	132.87	19.1%
MH	88.95	13.7%
MP	105.00	23.7%

NH	120.23	9.8%
OH	139.90	6.6%
Project Total	119.43	5.0%

E. Provide the calculation of the offset project's reversal risk rating and contribution to the Forest Buffer Account.

Risk Category	No QCE or not Public Land	QCE and/or Public Land	Score	(1-Score)
Financial	5.0%	1.0%	5.0%	95.0%
Management				
Illegal forest biomass removal	0.0%	0.0%	0.0%	100.0%
Risk of conversion	2.0%	0.0%	2.0%	98.0%
Risk of over-harvesting	2.0%	0.0%	2.0%	98.0%
Social	2.0%	2.0%	2.0%	98.0%
Natural Disturbance				
Wildfire (X%)	4.0%	4.0%	4.0%	96.0%
Disease Insect	3.0%	3.0%	3.0%	97.0%
Other catastrophic	3.0%	3.0%	3.0%	97.0%
Risk Rating Analysis Result			100%	- 80.76%
Total Risk Score				19.24%

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 U.S. Forest protocol.**

The project was modeled using the FVS (Forest Vegetation Simulator) Southern Variant growth and yield model, calibrated using regional data (i.e. project location and southern variant default site index values). Treatment types in the baseline model include regeneration harvests and thinnings. Regeneration consists of hardwood sprouts, natural conifer regeneration, and advanced regeneration from established seedlings and saplings. The treatments retain trees of similar species composition as were present at the time of harvest. The harvest frequency is a function of the minimum feasible harvest volume among other factors. This results in an average return interval for treated stands of approximately 10 years for most thinned acres and not less than 50 years for regeneration harvests. Regeneration assumptions rely on variant and species-specific sprouting reproduction. Legal constraints are described in Attachment K.

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

A graph of the baseline onsite carbon stocks, labeled "Attachment G," must be portrayed depicting time on the x-axis and metric tons CO₂-e on the y-axis. Include a written characterization describing any annual change in baseline carbon stocks over time. See Part X of this document for more information. A diagram of the baseline incorporating all required carbon stocks, labeled "Attachment H," is also required.

See Attachments G and H.

- 3. Optional:** Identify the approved growth model that will be used for the project.

FVS, Southern Variant

- 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. Optional: Does the project use a harvest schedule model? <i>If "yes," proceed to question 4c. Otherwise, skip to question A5.</i>	☐ Yes ☐ No
c. Optional: Explain how you are addressing 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. 6,653.53	
6. Provide a projection of baseline and actual harvesting volumes from the Project Area over 100 years. <i>A projection may be provided in an attachment, labeled "Attachment I". Include a narrative with a clear explanation of how the OPO/APD arrived at the baseline and actual harvest volumes is determined</i>	
B. Required for Improved Forest Management Projects on <u>Private Lands ONLY</u>	
1. Provide the initial above ground standing live carbon stock (per acre) for the project. 95.44	
2. Provide the Common Practice statistic (per acre) associated with the Project Area. 77.30	
3. Summarize how the Project's initial above-ground standing live carbon stock compares to Common Practice. The project's initial above-ground standing live carbon stock is above the common practice statistic. Are the initial above-ground standing live carbon stocks above or below Common Practice? Above If below Common Practice, what is the High Stocking Reference for the Project Area? Describe the Project Area's live tree carbon stocks over the previous 10 years. <i>Further documentation is required if project is below Common Practice. Submit supporting documents as attachments labeled "Attachment J." See Part X of this document for more information. An affidavit must be submitted testifying that the inventory depicted over the past 10 years is reasonably accurate.</i>	☒ Above ☐ Below
4. Optional: Does the Forest Owner(s) and its affiliate(s) own land in fee or hold timber rights on land outside the Project Area? <i>If "no," skip to question B.5.</i>	☒ Yes ☐ No
Optional: 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)? <i>If "no," skip to question B.5.</i>	☐ Yes ☒ No
Optional: If "yes," is inventory data available for the LMU or will the OPO use a stratified vegetation analysis? <i>If "no," skip to question B.5.</i>	☐ Data available for LMU ☐ Stratified Vegetation Analysis
Optional: Identify the Minimum Baseline Level for above-ground standing live carbon stocks for the Project Area: 77.30	
5. Provide a description of any and all legal constraints affecting forest management activities in the Project Area. Include documentation of legal constraints and a description of each constraint (referring to Section 6.2.1.2); for each constraint provide a narrative that constraint has on forest management. <i>Submit supporting documents as attachment labeled "Attachment K". See Part X of this reporting document for more information.</i> See Attachment K	
6. Provide a description of the modeling techniques used to simulate the effect of any constraints on carbon stocks. See Attachment K Optional: Provide a description of the modeling techniques used to simulate forest management activities that may affect carbon stocks.	
7. How does 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 <i>Supporting documentation is required. Submit as attachment labeled "Attachment L." See Part X of this listing document for more information.</i>	
C. Required for Improved Forest Management Projects on <u>Public Lands ONLY</u>	

1. Provide a projection of future changes to Project Area forest carbon stocks extrapolating from historical trends.			
2. Explain how current public policy affects onsite carbon stocks and how the baseline modeling incorporates constraints imposed by all applicable statutes, regulations, policies, plans, and activity-based funding.			
3. Have carbon stocks in the Project Area been increasing or declining over the preceding ten-year period?			☐ Increasing ☐ Declining
PART IX. OTHER OFFSET PROGRAMS			
A. Have any GHG reductions or GHG removal enhancements associated with the Project Lands ever been listed or registered with, or otherwise claimed by, another registry or program, or sold to a third party prior to listing? <i>If "yes," identify the registry or program and provide details on the issued credits below.</i>			☐ Yes ☒ No
B. Have any lands within the Project Area ever been listed or registered with an offset project registry or program in the past? <i>If "yes," identify the registry or program and provide details on the issued credits below.</i>			☐ Yes ☒ No
C. 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? <i>If "yes," identify the goal(s) and provide details on the reductions and removal enhancements (under "Number of Credits Issued") below.</i>			☐ Yes ☒ No
Registry/Program/Goal(s):	Reporting Period(s):	Vintage(s):	Number of Credits Issued:
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. If the project is a private lands project, mark "N/A" in the box below. The OPO may provide an "Attachment B" page with a "This Page Left Intentionally Blank - Private Lands Project" notation on the page. ☒ N/A C. If a Qualified Conservation Easement (QCE) has been recorded, provide a copy. The information contained in this form and the documents attached to it will be submitted to ARB so submitting a copy of the QCE as an attachment to this document fulfills the requirement in 9.1.1.1(18)(a) of the U.S. Forest protocol 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. <i>Note that the georeferenced shape file may constitute the required map if it includes the required map information listed above.</i> 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 CO₂e			

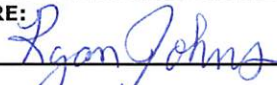
depicted on the y-axis.

- H. Attach a diagram of the final baseline incorporating all required carbon stocks.
- I. Provide a projection of baseline and actual harvesting volumes from the Project Area over 100 years.
- J. For IFM projects on private lands ONLY: 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. Also include a summary of volume harvested over the past 10 years. ☒ N/A
- K. For IFM projects on private lands ONLY: Attach supporting documentation identifying the legal constraints within the Project Area. A 'constraints' table with the following categories may be provided for simplicity with the following information: narrative of legal constraint, identification of specific governing law guiding the constraint, acreage, silviculture method, retention strategy. ☐ N/A
- L. For projects on private lands ONLY: Provide a description and supporting evidence, if applicable, that the growth and harvesting regime assumed for the baseline is financially feasible based on the qualifications in Section 6.2.1.3 of the Protocol. ☐ N/A

PART XI. OPO/APD SIGNATURE

Note: The person signing this Initial Reporting Period report should be the same person signing the accompanying U.S. Forest Offset Project Data Report Annual Reporting Period - All Project Types report.

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: 	PRINTED NAME: Ryan Johns
TITLE: Vice President	DATE: 2-19-20

Background for U.S. Forest Offset Project Data Report Initial Reporting Period – Improved Forest Management

Section 95976(d) of the Cap-and-Trade Regulation specifies reporting requirements for offset projects participating in the Compliance Offset Program. Offset Project Operators (OPO) or Authorized Project Designees (APD) are required to submit an Offset Project Data Report (OPDR) within four months of the end of each (annual) Reporting Period. The Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 and Compliance Offset Protocol U.S. Forest Projects, November 14, 2014 both require additional information to be included with the initial OPDR. This form is designed to help OPOs and APDs provide the extra information required for an initial OPDR by U.S. Forest offset projects. The information in this form is submitted to the approved Offset Project Registry that is listing the offset project and should also be provided to the ARB-accredited verification body that will be verifying the Offset Project Data Report.

The information to be provided in this form closely mirrors information provided in the application for listing a U.S. Forest offset project. OPOs and APDs may wish to copy the information in their project's application for listing to the extent that the information provided at the time of that application has not changed.

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](http://www.arb.ca.gov/cc/capandtrade/offsets/forms/forms.htm).

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 U.S. Forest Offset Project Data Report Initial Reporting Period – Improved Forest Management

This form is protected with restricted editing to facilitate completing the form. If the applicant wishes to unprotect the form, the password is "form".

Part I. Entity Submitting Report:

- Indicate whether the Offset Project Operator (OPO) or Authorized Project Designee (APD) is submitting the Offset Project Data Report.
- 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. Also provide the project's identification number from the approved Offset Project Registry listing the project. The ARB project identification number may also be provided if known.
- Indicate the offset project commencement date and the start and end dates of the first reporting period. Unlike with the listing form, approximations are no longer acceptable for these dates since precise dates should be known.
- 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 triggered by the transfer of property ownership, recordation of a conservation easement on the Project Area, or when submitting the offset project listing information.

Part III. OPO/APD Information:

- Enter contact information for the OPO and APD submitting the report. 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 report 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 report for more information on the precise requirements.
- The Project Area should be determined following the requirements of Section 4 of the U.S. Forest protocol.
- 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 report 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 U.S. Forest protocol.
- Details on the Natural Forest Management criteria can be found in Table 3.2 in the U.S. Forest protocol.

Part VII. Carbon Stock Inventory:

- Projects are required to have completed a full carbon stock inventory for the initial Offset Project Data Report. Unlike the inventory provided at the time of listing, a general description of the project's inventory methods with preliminary best estimates is no longer sufficient to meet the regulatory requirements. If the project's inventory methodology changed between the time of listing and submission of the initial OPDR, this change should be reported as a change to the information submitted at project listing when submitting the first OPDR.
- Section 6.2 of either the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 or the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014 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. (There are some differences in section 6.2 and Appendix A between the two versions.)
- Follow the steps in Appendix D of the U.S. Forest protocol 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. Unlike the listing application, for this OPDR an approximation of the contribution to the Forest Buffer Account is not acceptable.

Part VIII. Offset Project Baseline:

- For this OPDR, unlike the project listing application, projects are required to have a finalized baseline. A modeling plan with preliminary best estimates is no longer sufficient to meet the regulatory requirements. If the project's modeling plan or baseline estimates changed between the time of listing and submission of the initial OPDR, this change 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.

- A diagram and graph are required to complement the descriptions provided in this part. See Part X of this report for more information on the precise requirements.
- Section 6.2 of either the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 or the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014 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. (There are some differences in section 6.2 and Appendix B between the two versions.)
- ARB approved growth models can be found in Appendix B, Section B.1 of either the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 or the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014. (There are some differences in Appendix B between the two versions.)

Part IX. Other Offset Programs:

- Answer all questions. If the answer to any 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 Initial Reporting Period-Offset Project Data Reporting Form.
- 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. OPO/APD Signature:

- The individual signing the document must be registered in CITSS as the OPO's Primary Account Representative or Alternate Account Representative for the entity submitting the information. 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 individual's signature, printed name, corporate title, and date signed.
- There are no attestations for this report. The attestations required for the Offset Project Data Report are included in the form U.S. Forest Offset Project Data Report Annual Reporting Period – All Project Types.

Please contact your Offset Project Registry with any questions regarding the OPDR.