

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 <i>Designation of Authorized Project Designee</i> simultaneously.				☒ OPO ☐ APD
Name of Person Completing Form: Keith Williams		Organization, if applicable: Corrigan TLP, LLC		
Date Form Completed: 10/28/2015		Phone Number: 601-948-8733	Email Address: kwilliams@molpus.com	
PART II. OFFSET PROJECT INFORMATION				
Offset Project Name: Finite Carbon – Molpus Ataya Tennessee IFM				
Offset Project Commencement Date: 10/28/2015		First Reporting Period Start Date: 10/28/2015	First Reporting Period End Date: 10/27/2017	
Provide an explanation and justification for the commencement date. Specify the action(s) that identify the offset project commencement date. The discrete, verifiable action identifying the project commencement date for this project is the date of submittal of listing information to CAR on 10/28/2015.				
PART III. OPO/APD INFORMATION				
A. OPO				
OPO Name: Corrigan TLP, LLC			OPO's CITSS ID#: CA 2009	
Mailing Address: 654 N. State Street		City: Jackson	State: MS	Zip: 39202
Contact Person: Keith Williams		Phone Number: 610-948-8733	Email Address: kwilliams@molpus.com	
B. APD (if applicable)			☒ No APD/Not Applicable	
APD Name:			APD's CITSS ID#: CA X X X X	
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? <i>Further documentation is required for all projects. Submit as attachment labeled "Attachment A." See Part X of this listing document for more information.</i> If "no," explain how the entity identified as the OPO has the right to undertake and list the project.				☒ Yes ☐ No

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.). Corrigan TLP, LLC		
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 as attachment labeled "Attachment B." See Part X of this listing document for more information.</i>		☒ Private ☐ Public
1. Describe the public process that has been used to approve forest management activities and baseline. N/A		
2. Describe the documentation being submitted with this listing document demonstrating approval of planned forest management activities and baseline. N/A		
D. Will 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 listing document for more information.</i>		☐ QCE ☐ Public Ownership
1. Date that the QCE was or will be recorded. N/A		
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. 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 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.</i>		
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		
<i>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.</i>		
Latitude of Offset Project Location: 36.537	Longitude of Offset Project Location: - 83.886	Project Area Total Acreage: 26,261 (preliminary estimate, pending completion of project inventory)
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. Supersection: Allegheny & North Cumberland Mountains – Assessment Areas: Cove Forest (3,748 ac.), Oak-Hickory (5,721 ac.), Northern Conifer (1,530 ac.), Mixed Pine-Hardwood (1,272 ac.), Pine (6,460 ac.), & Northern Hardwoods (7,530 ac.)		
B. Identify the governing jurisdiction(s) applicable to the Project Area. State of Tennessee (Campbell & Claiborne Counties)		
C. Describe how the Project Area was determined. The project area was determined by identifying fee simple forestlands under management with the Corrigan TLP, LLC in the Allegheny & North Cumberland Mountains Supersection.		
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 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 along the Kentucky and Tennessee border near the Cumberland Gap		

National Historic Park. The forest vegetation within the Project Area boundary is predominately comprised of species such as eastern white pine, eastern hemlock, red maple, red oak, yellow poplar, and other mixed hardwoods.	
F. Describe the site classes within the Project Area boundary. Within the Project Area, 100% of the area is considered low site class (less than 120 cubic feet of growth annually) based on the NRCS soils site productivity data.	
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 will consist of commercial forestry practices as well as recreation and hunting.	
I. Describe generally the forest conditions within the Project Area, including species composition, age class distribution, and management history. 100% of the forested acres within the Project Area are in ages greater than 20 years old. Species associated with the Cove Forest assessment type dominate the species composition (eastern white pine, eastern hemlock, red maple, red/white oak, and other mixed conifers). Most of the Project Area has been under some form of forest management for the past 100 plus year. Currently, the Project Area is managed with uneven-aged silvicultural systems.	
PART VI. OFFSET PROJECT ELIGIBILITY	
A. Does the project take place on land that has greater than 10 percent tree canopy cover? <i>Supporting documentation is required. Submit as attachment labeled "Attachment F." See Part X of this listing document for more information.</i>	☒ 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, November 14, 2014:	
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? <i>If "no," proceed to question 1b. Otherwise, skip to question B2.</i>	☒ 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? <i>If "no," proceed to questions 2b and 2c. Otherwise skip to question B3.</i>	☒ 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 meet this requirement? <i>If "no," proceed to question 3c. Otherwise, skip to question B4.</i>	☒ 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? The project will ensure that structural elements are retained in sufficient quantities throughout the project life by continuing to implement project activities that do not include the active harvest or removal of standing or lying dead wood. Structural elements are incorporated into management planning.	
C. Describe the management activities that will lead to increased carbon stocks in the Project Area, compared to the baseline. 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.	
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? <i>If "yes," proceed to questions E1 and E2. Otherwise, skip to Part VII.</i>	☐ 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, November 14, 2014, 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, November 14, 2014. In general, the purpose of the forest carbon inventory will be to directly estimate the onsite carbon stocks in the IFM1 and IFM3 pools and indirectly estimate the remaining carbon pools required by the FOP and listed below. A more fully detailed inventory methodology will be submitted with the initial OPDR. The forest will be stratified based on forest type and allocate a certain number of plots	

to each stratum using a random grid created in GIS. Each plot will be located with GPS and permanently monumented to facilitate future re-measurement and site visit verifications. The inventory will use a combination of 10 BAF point sampling (for trees ≥ 5 " dbh) and 1/100th fixed area plots (for trees ≥ 1 " dbh and < 5 " dbh). The inventory will be audited during the collection process and corrective actions implemented to maintain data quality. Cruisers will also identify and note any signs of diseases that may affect the health of the project's inventory. Below is the list of tree data to be collected at each plot.

IFM-1 Standing Live:

At each plot, "in" trees will be tallied along with species, dbh, trunk or bole height, and soundness deduction. These sample plots will provide inventory estimates in terms of cubic foot volume and biomass following the procedures and guidance listed on ARB's website and within the protocol.

IFM-3 Standing Dead:

At each plot, "in" trees will be tallied along with species, dbh, trunk or bole height $\geq 15'$, soundness deduction and decomposition class. These sample plots will provide inventory estimates in terms of cubic foot volume and biomass following the procedures and guidance listed on ARB's website and within the protocol.

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 IFM-7 will be calculated based on mill receipts in accordance with Appendix C of the FOP, for the Baseline IFM-7 will be modeled in accordance with Appendix B and calculated in accordance with Appendix C of the FOP.

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

For the Project IFM-8 will be calculated based on mill receipts in accordance with Appendix C of the FOP, for the Baseline IFM-7 will be 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 the 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#IFM-7) and landfills (SSR #IFM-8).

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:

Standardized FIA cubic foot volume equations and Component Ratio Method. Carbon will be estimated as 50% of the dry biomass. Carbon will be converted to CO₂e using 3.664.

IFM-3 Standing Dead:

The Domke et al. (2011) method as referenced on ARB's FOPR website will be incorporated into standardized FIA cubic foot volume equations and Component Ratio Method. Carbon will be estimated as 50% of the dry biomass. Carbon will be converted to CO₂e using 3.664.

IFM-6 Soil (if applicable):

N/A

IFM-7 Carbon in in-use forest products:

Regional mill efficiencies and 100-year default storage factors

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

Regional mill efficiencies and 100-year default storage factors

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

IFM- 9 Biological emissions from site preparation:

N/A (see Section A above)

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

Estimated in the project using the 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#IFM-7) 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:**

116.25 (preliminary estimate)

IFM-3 Standing Dead:

2.00 (preliminary estimate)

IFM-6 Soil (if applicable):

N/A (see section A above)

IFM-7 Carbon in in-use forest products:0.03 tCO₂e/acre (preliminary estimate)**IFM-8 Forest product carbon in landfills (if applicable):**0.07 tCO₂e/acre (preliminary estimate)**IFM- 9 Biological emissions from site preparation:**

N/A

IFM-14 Biological emissions/removals from change in harvesting on forestland outside project area:0.025 tCO₂e/acre (preliminary estimate)**IFM-17 Biological emissions from decomposition of forest products:**0.015 tCO₂e/acre (preliminary estimate)**D. Provide a summary of the estimated inventory confidence statistics.**

The preliminary estimate of the total onsite carbon stocks final sampling error is 4% based on a 90% confidence interval.

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

The preliminary estimate of the project's reversal risk rating and expected contribution to the Forest Buffer Account is 19.24%.

Risk Category	No QCE and/or not public land	QCE and/or Public	Score	(1-%)
Financial	5.00%	1.00%	5.00%	95.00%
Management				
Illegal Forest Biomass Removal	0.00%	0.00%	0.00%	100.00%
Risk of conversion	2.00%	0.00%	2.00%	98.00%
Risk of Over-harvesting	2.00%	0.00%	2.00%	98.00%
Social	2.00%	2.00%	2.00%	98.00%
Natural Disturbance				
1 Wildfire (Y%)	4.00%	4.00%	4.00%	96.00%
Disease Insect	3.00%	3.00%	3.00%	97.00%
Other catastrophic	3.00%	3.00%	3.00%	97.00%
				80.76%
				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 Compliance Offset Protocol U.S. Forest Projects, November 14, 2014.**

The modeling plan will use the FVS (Forest Vegetation Simulator) Southern Variant growth and yield model and may be calibrated using the regional and site specific options available (i.e. project location, site index values, and incremental core data). Uneven-age silviculture will be implemented. The treatments will likely retain trees of similar species composition as were at the time of harvest. The harvest frequency will be a function of the minimum feasible harvest volume among other factors. Regeneration assumptions will rely on variant and species specific sprouting reproduction for hardwoods and natural seeding and/or planting for conifers. Legal constraints are described in Part VIII.B(6) of this listing form. Single-tree selection harvesting will be used where it is required to ensure canopy retention in sensitive areas along rivers and other water bodies. A list of the anticipated site indices are described by species in the FVS Southern Variant overview. A detailed modeling plan will be available to verifiers and submitted with the initial OPDR after the baseline modeling has been completed.

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

The preliminary estimate of the average baseline total onsite carbon stocks is 97.25 tCO₂e per acre. The baseline carbon stocks model is currently being developed but is estimated to approximate common practice. Baseline carbon stocks are estimated to initially decrease as a result of increased harvest intensity, including thinnings, single and small group selection harvests, and overstory removals, and then fluctuate up and down around common practice stocking throughout the remainder of the 100-year projection. The development case for each stand, and the management regime at the landscape level, will yield an acceptable return on investment for the forest owner, with a focus on an early reduction in onsite stocking that is consistent with the activities of many larger commercial timber owners in the area, while also maintaining compliance with applicable local, state, and federal laws. Annual changes in baseline stocks will likely reflect maximum early return from timber harvesting, with sustained productivity and a harvest and growth pattern that indefinitely serves multiple management objectives.

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.**

The Forest Vegetation Simulator (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. **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?**

Harvest scheduling will be constrained such that no more than 40% of the project area is in age classes less than 20 years old. Harvest unit age class and stratum will be updated post-harvest based on silvicultural prescriptions.

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

The preliminary estimate of average carbon that will be stored long-term in harvested wood products in the baseline (including landfills) is 0.10 tCO₂e per acre.

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.**

The preliminary estimate for the initial above ground standing live carbon stock per acre is 97.31 tCO₂e.

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

The preliminary estimate for the adjusted above ground standing live carbon stock per acre is 89.00 tCO₂e.

3. Provide the Common Practice statistic associated with the Project Area. The preliminary estimate for the Common Practice Statistic associated with the Project Area is 89.00 tCO ₂ e per 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? <i>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.</i>	☒ Above ☐ Below
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. The baseline harvest scenario is currently under development. The final baseline will be modeled in accordance with all applicable legal constraints, which include: Endangered Species Act The Endangered Species Act (ESA) provides a program for the protection and conservation of threatened and endangered plants and animals and the habitats or ecosystems in which they are found. The lead federal agencies for implementing ESA are the U.S. Fish and Wildlife Service (USFWS) and the U.S. National Oceanic and Atmospheric Administration (NOAA) Fisheries Service. Projects or activities on private lands that have the potential to "take" a listed species must apply for an Incidental Take Permit (ITP). Any party that is issued an ITP must have also prepared a Habitat Conservation Plan (HCP) which mitigates such takings and conserves the species' habitat, both of which support overall recovery of the species. Clean Water Act Through a variety of programs (including, as appropriate, non-regulatory or regulatory programs), states assist and encourage producers to use best management practices to reduce or prevent instances of nonpoint source pollutants migrating into waters. Accordingly, the State of Tennessee developed a set of voluntary Forestry Best Management Practices (BMPs) first established in the mid-1970s in response to the Federal Clean Water Act. These practices are designed to provide guidelines for conducting forest management activities in the best way to reduce impact to water quality as well as certain wildlife habitat values. BMPs are not regulated by government in Tennessee, so it's up to forest landowners to adopt and implement BMPs to aid in the protection of water quality during forest management practices.	
7. Provide a description of the modeling techniques used to simulate the effects of the constraint. Techniques to simulate the effects of the constraint include spatial designation of special management areas and applications of silvicultural treatments designed appropriately for each area as a function of each area's constraints.	
8. 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
Supporting documentation is required. Submit as attachment labeled "Attachment J." See Part X of this listing document for more information.

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?
<i>If "yes," identify the registry or program and provide details on the issued credits below.</i> | ☐ 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?
<i>If "yes," identify the registry or program and provide details on the issued credits below.</i> | ☐ Yes
☒ No | | |
| Registry/Program: | 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. ☒ 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, November 14, 2014 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 CO₂e depicted on the y-axis.
- H. Attach a diagram of the baseline incorporating all required carbon stocks.
- I. For 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 and a summary of volume harvested over the past 10 years. ☒ N/A
- J. 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. ATTESTATIONS AND OPO SIGNATURE

KW Initial	I certify under penalty of perjury under the laws of the State of California the GHG reductions and/or GHG removal enhancements for			
	Project Name: Finite Carbon – Molpus Ataya Tennessee IFM	from	Crediting Period Start Date: 10/28/2015	to Crediting Period End Date: 10/27/2040
	will be measured in accordance with the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014, and all information required to be submitted to ARB is true, accurate, and complete.			
KW 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.			
KW 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: 		PRINTED NAME: Keith Williams		
TITLE: Managing Director - North Region		DATE: October 28, 2015		

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, November 14, 2014, for listing an offset project. The U.S. Forest protocol 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

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 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, November 14, 2014.
- 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, November 14, 2014.
- Details on the Natural Forest Management criteria can be found in Table 3.2 in the Compliance Offset Protocol U.S. Forest Project, November 14, 2014.

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, 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.
- Follow the steps in Appendix D of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014 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, 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 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, November 14, 2014.
- 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.