

U.S. FOREST OFFSET PROJECT DATA REPORT INITIAL REPORTING PERIOD - IMPROVED FOREST MANAGEMENT				
OPR <i>Staff Use Only</i>	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
Report Version Number: Version 1.1	Date Report Completed: 10/30/2019		Date Report Submitted: 10/30/2019	
Person Completing Report: Billy Joe Kieffer	Phone Number: 509-626-4427	Email Address: bjk@spokanetribe.com		
PART II. OFFSET PROJECT INFORMATION				
Offset Project Name: Finite Carbon - Spokane Tribe of Indians IFM		OPR Project ID#: CAR1314	ARB Project ID# (if known): CAFR6314	
Offset Project Commencement Date: 09/18/2018	First Reporting Period Start Date: 09/18/2018		First Reporting Period End Date: 04/15/2019	
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 the project was the submittal of the listing application on 09/18/2018.				
Optional: Provide the nearest town/city to the Project Area: Wellpinit, Stevens County, WA				
PART III. OPO/APD INFORMATION				
A. OPO				
OPO Name: Spokane Tribe of Indians			OPO's CITSS ID#: CA 2757	
Mailing Address: P.O. Box 480	City: Wellpinit		State: WA	Zip: 99040
Contact Person: Billy Joe Kieffer	Phone Number: 509-626-4427	Email Address: bjk@spokanetribe.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:		
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>				☐ Yes ☒ No

If "no," explain how the entity identified as the OPO has the right to undertake and list the project.

The OPO is a federally recognized Indian Tribe and the project is on land held in Trust for the Spokane Tribe of Indians by the U.S. Government. In accordance with the Indian Reorganization Act (IRA) of 1934, the Tribe has the right to manage its assets and natural resources, including the ability to develop a carbon offset project.

- 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.).

The Spokane Tribe of Indians

- C. Does the offset project occur on public or private lands?**

If the project occurs on public lands, proceed to questions C1 and C2. Otherwise, skip to question D.

Further documentation is required if project occurs on public lands. Submit 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.

☒ 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)?**

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.

☐ 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

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.

- 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.

The Project Area lands are held in Trust by the U.S. government for the Spokane Tribe of Indians (25 U.S.C. Chapter 33 - National Indian Forest Resources Management Act).

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:

47.94

Longitude of Offset Project Location:

-118.046

Project Area Total Acreage:

95,389.88 acres

- 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/Assessment Area	Acres
Okanogan Highland Ponderosa	60,161.54
Okanogan Highland Douglas-fir Mixed Conifer	33,217.10
Columbia Basin Mixed Conifer	2,011.24
Total	95,389.88

B. Identify and describe the governing jurisdiction(s) applicable to the Project Area. The Project Area is subject to the jurisdiction of the Spokane Tribe of Indians held in trust by the U.S. government located in Stevens County, Washington.	
C. Describe how the Project Area was determined. The project area consists of the majority of the Tribe's trust commercial forest land and was determined through consultation with Tribal leadership and the Tribe's forestry department.	
D. Describe the existing land cover, and land use of the Project Area. The existing land cover is dominated by forests native to the region and the land is managed for timber production on a sustained yield basis as well as for a variety of cultural, recreational, and wildlife objectives.	
E. Describe the forest vegetation types within the Project Area boundary. The forest vegetation within the Project Area boundary is predominantly ponderosa pine, Douglas-fir, grand fir, red alder, western larch, and lodgepole pine.	
F. Describe the site classes within the Project Area boundary. Site classes are typical for the region and based on NRCS soils site productivity data, 88% (83,848.06 acres) of the Project Area are classified as "Low" site class (less than 85 cubic feet of growth annually) and 12% (11,541.82 acres) are classified as "High" site class (greater than 85 cubic feet of growth annually).	
G. Describe the land pressures and climate zone/classification applicable to the Project Area. The primary land use for Project Area's region is forestry with very limited residential and traditional use development. Review of air photos and satellite imagery reveal a forest dominated landscape. The project lies entirely 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 historical land uses within the Project Area have been timber production, outdoor recreation, and subsistence hunting, fishing, and gathering with limited agricultural and rangeland activities. The Project Area is currently zoned as multiple use forestland and projected land use within the Project Area is expected not to change from its current use and will continue to support large, intact blocks of native forests in eastern Washington.	
I. Describe the forest conditions within the Project Area, including species composition, age class distribution, and management history. The project area is dominated by a mature, healthy forest that supports a wide range of native flora and fauna in large blocks of contiguous forests. 97% of the forested acres within the Project Area are in ages greater than 20 years old. Species associated with the Okanogan Highland Supersection dominate the species composition.	
PART VI. OFFSET PROJECT ELIGIBILITY	
A. Does the Project Area have a canopy cover that is greater than 10 percent? <i>Supporting documentation is required. Submit as attachment labeled "Attachment F." See Part X of this document for more information.</i>	☒ Yes ☐ No
B. Optional: Are the associated project lands currently in compliance with all local, state, and federal regulatory requirements? Optional: If no, provide an explanation of the non-compliance.	☒ Yes ☐ No
C. Does the entity submitting this report declare that the offset project <u>has not</u> and <u>does not</u> 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.	☒ Yes ☐ No

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

Species ID	Common Name	Scientific Name	BA (sqft/ac)	Percent
17	grand fir	Abies grandis	2.60	3.64%
73	western larch	Larix occidentalis	2.78	3.89%
108	lodgepole pine	Pinus contorta	2.74	3.83%
119	western white pine	Pinus monticola	0.01	0.01%
122	ponderosa pine	Pinus ponderosa	33.93	47.48%
202	Douglas-fir	Pseudotsuga menziesii	29.13	40.76%
231	Pacific yew	Taxus brevifolia	0.00	0.00%
242	western red cedar	Thuja plicata	0.01	0.01%
264	mountain hemlock	Tsuga mertensiana	0.00	0.00%
351	red alder	Alnus rubra	0.06	0.08%
500	hawthorn species	Crataegus	0.06	0.08%
746	quaking aspen	Populus tremuloides	0.14	0.20%
747	black cottonwood	Populus balsamifera ssp. trichocarpa	0.00	0.00%
760	plum/cherry species	Prunus	0.00	0.00%
920	willow species	Salix	0.00	0.00%
Total Native			71.46	100.00%
Total			71.46	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?

If "no," proceed to questions 2b and 2c. Otherwise skip to question D3.

Supersection: Okanogan Highland

Assessment Area: Ponderosa (SDI = 90%)

Species ID	Common Name	BA (sqft/ac)	Percent
17	grand fir	0.15	0%
73	western larch	1.43	2%
108	lodgepole pine	0.73	1%
122	ponderosa pine	43.40	66%
202	Douglas-fir	19.57	30%
242	western red cedar	0.01	0%
351	red alder	0.02	0%
500	hawthorn species	0.02	0%
746	quaking aspen	0.02	0%
Total		65.35	100.00%

Supersection: Okanogan Highland

Assessment Area: Douglas-fir Mixed Conifer (SDI = 70%)

Species ID	Common Name	BA (sqft/ac)	Percent
17	grand fir	7.19	9%
73	western larch	5.39	6%
108	lodgepole pine	6.54	8%
119	western white pine	0.03	0%
122	ponderosa pine	16.34	19%
202	Douglas-fir	48.02	57%

☒ Yes
☐ No

231	Pacific yew	0.00	0%
264	mountain hemlock	0.01	0%
351	red alder	0.14	0%
500	hawthorn species	0.14	0%
746	quaking aspen	0.35	0%
747	black cottonwood	0.00	0%
760	plum/cherry species	0.01	0%
920	willow species	0.00	0%
Total		84.16	100.00%

Supersection: Columbia Basin

Assessment Area: Mixed Conifer (SDI = 65%)

Species ID	Common Name	BA (sqft/ac)	Percent
17	grand fir	0.00	0%
73	western larch	0.04	0%
108	lodgepole pine	0.16	0%
122	ponderosa pine	41.41	63%
202	Douglas-fir	3.39	5%
242	western red cedar	0.00	0%
351	red alder	0.00	0%
500	hawthorn species	0.00	0%
746	quaking aspen	0.00	0%
Total		45.00	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).

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?

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

Watershed	Acres by Stand Age			Percent < 20
	<20	>=20	Total	
Watershed Management Unit				
Blue Creek-Spokane River_1	9.64	6,796.56	6,806.20	0.1%
Blue Creek-Spokane River_2	35.50	6,061.36	6,096.87	0.6%
Harker Canyon-Spokane River	4.11	5,995.63	5,999.74	0.1%
Lower Chamokane Creek	105.98	4,698.19	4,804.16	2.3%

☒ Yes
☐ No

Lower Little Chamokane Creek	95.08	5,282.23	5,377.30	1.8%
Mathews Lake-Spokane River	0.34	5,867.60	5,867.94	0.0%
Middle Chamokane Creek	341.61	3,339.97	3,681.58	10.2%
Monaghan Creek-Franklin D Roosevelt Lake	8.14	460.48	468.62	1.8%
North Fork Chamokane Creek	151.78	2,382.27	2,534.05	6.4%
Orzada Creek-Spokane River_1	110.62	4,810.70	4,921.32	2.3%
Orzada Creek-Spokane River_2	-	5,108.84	5,108.84	0.0%
Sams Creek	528.71	5,802.59	6,331.30	9.1%
Sand Creek_1	108.13	4,715.99	4,824.12	2.3%
Sand Creek_2	203.16	6,298.66	6,501.81	3.2%
Threemile Creek-Franklin D Roosevelt Lake	17.10	4,979.86	4,996.96	0.3%
Upper Chamokane Creek	318.99	1,897.17	2,216.16	16.8%
Upper Little Chamokane Creek_1	70.32	4,148.81	4,219.13	1.7%
Upper Little Chamokane Creek_2	747.27	7,757.66	8,504.92	9.6%
Upper Little Chamokane Creek_3	467.52	5,662.00	6,129.52	8.3%
Total	3,323.97	92,066.57	95,390.54	3.48%

At the project level, the percent of forested acres in ages less than 20 years is well below 40 percent.
Note: Project acreage is 95,398.88. Age Class overlay with WMUs resulting in 95,390.54 acres; an acreage discrepancy of 0.67 acres due to GIS processing.

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?
The project will adhere to the Tribe's Forest Management Plan and Integrated Resource Management Plan practices for standing dead wood, down wood, and green recruitment trees (future snag/down wood) to provide cavity and/or down wood for dependent wildlife species, soil productivity, and effective ground cover. This will ensure that structural elements are retained in sufficient quantities throughout the project life.

E. Describe the management activities that will result in 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 and maintaining stocks at high levels (i.e. shorter rotations and maintaining lower carbon stocking levels in the 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:

The inventory consisted of a nested sample approach including a ninth (1/9) acre fixed radius plot (39.25 feet) with a 1/150 acre nested fixed radius plot (9.6 feet) at the same location. 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. No miscellaneous species or species group codes were used. 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 logger's tapes. Diameter measurement heights were established on the uphill side of tallied trees. Height of each stem was measured with a laser hypsometer and/or relaskop 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 4.2 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 was calculated based on mill receipts in accordance with Appendix C of the FOP. For the Baseline, IFM-7 was 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 was calculated based on mill receipts in accordance with Appendix C of the FOP. 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 #IFM-7) and landfills (SSR #IFM-8)

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 for projects located in Alaska, California, Oregon, and Washington as referenced on ARB's 2015 FOP website (Volume Estimation and Biomass Equations - Project Located in California, Oregon, and Washington Updated: 09/19/2014). Carbon was converted to CO₂e using 3.667.

IFM-3 Standing Dead:

The Harmon et al. (2011) density reduction factors by decay class were incorporated into the standardized FIA cubic foot volume and biomass equations for projects located in Alaska, California, Oregon, and Washington as referenced on ARB's 2015 FOP website (Volume Estimation and Biomass Equations - Project Located in California, Oregon, and Washington Updated: 09/19/2014). Carbon was converted to CO₂e using 3.667.

IFM-6 Soil (if applicable):

N/A, see part A.

IFM-7 Carbon in in-use forest products:

Regional mill efficiencies and 100-year default storage factors. For more information see ARB's 2015 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 2015 FOP, Appendix C.4.

IFM- 9 Biological emissions from site preparation:

N/A, see part A.

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 #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).

***Note: Values reported below represent End of RP1 Carbon Stocks**

IFM-1 Standing Live:

7,691,499

IFM-3 Standing Dead:

738,884

IFM-6 Soil (if applicable):

N/A, see part A

IFM-7 Carbon in in-use forest products:

7,484

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

5,362

IFM- 9 Biological emissions from site preparation:

N/A, see Part A

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

-6,302

IFM-17 Biological emissions from decomposition of forest products:

Quantified as part of IFM-7 and IFM-8

D. Provide a summary of inventory confidence statistics.

Strata	Plot Count (n)	Mean tCO ₂ e	Standard Deviation	Half 90% CI	Percent Error (PE)	Acres	Total Carbon Stock (TCS)	(TCS * PE) ²
Dry Pine	112	47.62	38.53	5.99	12.58%	22,935.02	1,092,069.76	18,868,430,756.82
Pine-fir	193	91.34	62.06	7.35	8.04%	39,237.76	3,584,047.38	83,133,344,817.29
Ninebark	92	105.50	69.54	11.93	11.31%	18,324.98	1,933,198.35	47,768,961,802.35
Wet Grand Fir	74	122.28	70.38	13.46	11.01%	14,892.12	1,821,067.45	40,170,669,175.21
Project Total	471	88.38			5.17%	95,369.88	8,430,382.94	189,941,406,551.66

5.00%

0.20% Confidence Deduction – rounded to nearest 1/10th percent**E. Provide the calculation of the offset project's reversal risk rating and contribution to the Forest Buffer Account.**

Risk Category	QCE	Public/Tribal	No QCE/Not Public/Not Tribal	Score	(1-%)
Financial	1.0%	1.0%	5.0%	1.0%	99.0%
Management					
Illegal Forest Biomass Removal	0.0%	0.0%	0.0%	0.0%	100.0%
Risk of conversion	0.0%	0.0%	2.0%	0.0%	100.0%
Risk of Over-harvesting	0.0%	0.0%	2.0%	0.0%	100.0%
Social	0.0%	0.0%	0.0%	0.0%	100.0%
Natural Disturbance					
Yes Wildfire (Reduction Work?)	4.0%	4.0%	4.0%	2.0%	98.0%
Disease Insect	3.0%	3.0%	3.0%	3.0%	97.0%
Other catastrophic	3.0%	3.0%	3.0%	3.0%	97.0%
Risk Rating Analysis: ((1-1%) x (1-0%) x (1-0%) x (1-0%) x (1-0%) x (1-2%) x (1-3%) x (1-3%))					91.29%
Total Risk Score: 100% - Risk Rating Analysis					8.71%

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) Inland Empire Variant growth and yield model calibrated using the regional and site-specific options available (i.e. project location, site index values, and Plant Association Groups) for the region. Uneven-age and even-aged silviculture will be implemented. The treatments 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 rely on species specific natural seeding for conifers. 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 Attachment G and H.

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

FVS Inland Empire Variant

4. Harvest Planning a. Is harvesting planned in the Project Area? <i>If "yes," proceed to question 4b. Otherwise, skip to question A5.</i>		☒ 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? 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. 20,036 (included landfill)		
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> A projection and narrative have been provided in Attachment I		
B. Required for Improved Forest Management Projects on Private Lands ONLY		
1. Provide the initial above ground standing live carbon stock (per acre) for the project. 64.52		
2. Provide the Common Practice statistic (per acre) associated with the Project Area. 53.65		
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 10.87 tons per acre above Common Practice. Are the initial above-ground standing live carbon stocks above or below Common Practice? 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> The Project Area consists of 1 LMU and all acres within the LMU are included within the Project Area		☒ 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: 53.65		
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> See Attachment L			
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(I) 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 (4 th 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 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 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: *Billy Joe Kieffer*

PRINTED NAME: *Billy-Joe Kieffer*

TITLE: *Director - Dept. Nat. Resources*

DATE: *10/30/19*

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. (However, this form may be insufficient for reporting all information required by the Compliance Offset Protocol U.S. Forest Projects, June 25, 2015.) 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](#).

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.
- Regulatory amendment in section 95976(d)(10) requires that each version of the OPDR specifies the version number and the date submitted. Moreover, the protocol requires that each OPDR include the date of completion. Please include the OPDR version number, the date of OPDR completion, and the date of OPDR submission to the Offset Project Registry.
- The person submitting the information should indicate the date the form is completed.
- List the name, phone, and email address of the person submitting the information. This person should be an employee of the OPO or APD. The person submitting the information need not be the contact person listed for the OPO or APD in Part III and also need not be the OPO's CITSS account representative signing the OPDR in Part XI.

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.

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

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 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 within this form. 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.