

&



Validation and Verification Report

ACR637 ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project

June 1, 2022

Ruby Canyon Environmental, Inc. 743 Horizon Ct. Suite 385 Grand Junction, Colorado 81506 (970) 241-9298 www.rubycanyonenv.com

TABLE OF CONTENTS

1	Intro	duct	ion	3
	1.1	Obje	ectives	3
	1.2	Proj	ect Background	4
	1.3	Resp	oonsible Parties	4
	1.4	Valid	dation and Verification Team	4
	1.5	Valid	dation and Verification Criteria	4
	1.5.2	1	Validation and Verification Standards, Guidelines, and Tools	4
	1.5.2	2	Level of Assurance	5
	1.5.3	3	Materiality	5
2	Valid	datio	n and Verification Process	5
3	Valid	datio	n and Verification Findings	6
	3.1	Proj	ect Boundary and Activities	6
	3.2	GHG	Sources Sinks, and Reservoirs	6
	3.3	Eligi	bility	7
	3.3.2	1	ACR Eligibility	7
	3.3.2	2	Methodology Eligibility	8
	1.1 1.2 1.3 1.4 1.5 1.5. 1.5. Valid 3.1 3.2 3.3 3.3. 3.4 3.4. 3.4. 3.4. 3.5 3.6 3.7 3.8 3.9 3.10 3.11 3.12 Valid Valid Valid Valid Valid Valid		itionality	
	3.4.2 Common Pract		Regulatory Surplus Test	8
			Common Practice Test	
	3.4.3		Implementation Barriers Test	
	3.5		nanence	
	3.6		age	
			ronmental and Community Impacts	
			ll Stakeholder Consultation	
			nitoring Plan	
			eline Scenario	
	_		site Inventory Verification Check	
		•	ect Data and GHG Emissions Reduction Assertion	
	3.12		Baseline Emissions	
			Project Emissions	
	3.12		Emissions Reductions	
4			n and Verification Results	
5			n and Verification Conclusion	
	•		Documents Reviewed	
Αı	opendix	B—I	ist of Findings	16

1 Introduction

The Indian Land Tenure Foundation (ILTF) contracted with Ruby Canyon Environmental, Inc. (RCE) to perform the validation and verification of the ACR637 ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project (Project) for the reporting period of February 13, 2019 – June 30, 2021 and a crediting period of February 13, 2019 – February 12, 2039 under the American Carbon Registry (ACR) program. ILTF acts the project proponent for the landowner, Keweenaw Bay Indian Community (KBIC). Spatial Informatics Group, LLC (SIG) acts as the project developer and manages the Project through the validation and verification process.

This report is documentation of validation and verification activities that RCE performed for the Project. For the validation, RCE reviewed the project information as described in the Project Plan "ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project, Greenhouse Gas Plan, Version 1.1, February 14, 2022". For the verification, RCE ensured that the GHG assertion was materially correct, that the data provided to RCE was well documented, and that if ILTF and SIG made any material errors, that these errors were corrected.

RCE worked with Forest Resource Solutions and Technologies (FRST) to complete this validation and verification.

1.1 OBJECTIVES

The objectives of the validation are to evaluate:

- Conformance to the ACR standard and the approved ACR Methodology for Improved Forest Management (Methodology);
- GHG emissions reduction project planning information and documentation in accordance with the applicable ACR-approved methodology, including the project description, baseline, eligibility criteria, monitoring and reporting procedures, and quality assurance/quality control (QA/QC) procedures;
- Reported GHG baseline, ex ante estimated project emissions and emissions reductions/removal enhancements, leakage assessment, and impermanence risk assessment and mitigation (if applicable).

The objectives of the verification are to evaluate:

- The emissions reductions and to ensure that the assertion is materially correct;
- The data provided to RCE can be documented and if errors or omissions are detected, they be corrected

RCE retains all data and documents for seven years after the end of the project reporting period or for the duration required by ACR, whichever is longer.

1.2 PROJECT BACKGROUND

The Project area is located on 15,356 acres of upland forests in the Upper Peninsula of Michigan.

The Keweenaw Bay Indian Community was established under the 1936 Treaty with the United States Government. It is one of the four original member tribes in Michigan that founded the Inter-Tribal Council of Michigan, Inc.

The Keweenaw Bay Indian Community Forest Carbon Project is situated within 18,811 acres of tribal land, of which approximately 16,500 acres is forested. By committing to maintain forest CO₂ stocks above the regional baseline, the project will provide significant climate benefits through carbon sequestration.

1.3 RESPONSIBLE PARTIES

Project Proponent

Indian Land Tenure Foundation 151 County Road B2E Little Canada, Minnesota 55117 Bryan Van Stippen, NICC Program Director Phone: 651-789-1744

Project Developer

Spatial Informatics Group, LLC. 2529 Yolanda Ct. Pleasanton, CA 94566 Charles Kerchner, Carbon Domain Manager Phone: 802-999-6986

1.4 VALIDATION AND VERIFICATION TEAM

Lead Validator and Verifier: Zach Eyler Biometrician: Andrea Eggleton, FRST

Professional Forester: Christian Eggleton, FRST

Forestry Analyst: Tim Facemire, FRST Internal Reviewer: Phillip Cunningham

1.5 VALIDATION AND VERIFICATION CRITERIA

1.5.1 Validation and Verification Standards, Guidelines, and Tools

- ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project, Greenhouse Gas Plan, Version 1.1 (February 28, 2022)
- ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project Monitoring Report (February 28, 2022)
- ACR Standard, Version 7.0 (December 2020)

- ACR Validation and Verification Standard Version 1.1 (May 2018)
- Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non - Federal U.S. Forestlands v.1.3, April 2018
- Errata and Clarifications Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non -Federal U.S. Forestlands v.1.3, September 30, 2021
- ISO 14064-3:2006 "Greenhouse gases Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions"

1.5.2 Level of Assurance

The verification was conducted to a reasonable level of assurance.

1.5.3 Materiality

The verification was conducted to ACR's required materiality threshold of +/-5% of the GHG project's emissions reductions or removal enhancements.

2 Validation and Verification Process

As the first step in validation/verification activities, the Lead Validator/Verifier developed a Validation/Verification Plan to be followed throughout the validation and verification. The plan included the following activities:

- RCE completed a COI form on June 28, 2021 to identify any potential conflict of interest with the Project or Project Developer. The COI form was approved by ACR on July 6, 2021.
- RCE, FRST and SIG held a validation/verification kick-off meeting on July 7, 2021. During the kick-off meeting RCE reviewed the validation/verification objectives and process, reviewed the schedule, and submitted an initial document request.
- RCE performed a strategic review and risk assessment of the received data and support documents to understand the scope and areas of potential risk in the GHG emissions reductions.
- RCE developed a risk-based sampling plan based upon the strategic review and risk assessment.
 The validation/verification plan and sampling plan were used throughout the process and were revised as needed based upon additional risk assessments.
- The validation/verification team conducted the site visit to the Project to verify the inventory quality and forest management practices on July 27-28, 2021. During the site visit the Verification Team performed key personnel interviews, conducted sequential sampling of inventory plots, conducted reconnaissance of the Project area boundary, observed elements of natural forest management, and observed harvest locations (if applicable) during and preceding the reporting period.
 - The site visit was attended by the following verification team personnel:
 - FRST:
 - Tim Facemire
 - During the site visit, the Verification team met with the following individuals:

- ILTF
 - Bryan Van Stippen
- Green Timber Forestry
 - Justin Miller
- RCE performed a risk-based desktop review of the submitted validation/verification documents.
 The desktop review included an assessment of the GHG calculation methods and inputs, source data completeness, GHG management and monitoring systems and eligibility documentation.
- RCE conducted interviews and had conversations with Project personnel during the verification. Personnel interviewed include:
 - Tim Kramer SIG
 - Paul Cousar SIG
- RCE submitted requests for corrective actions, non-material findings, additional documentation, and clarifications as necessary to ILTF and SIG throughout the validation/verification.
- RCE's internal reviewer conducted a review of the validation/verification sampling, report, and statement.
- RCE issued a final validation/verification report, verification statement, and List of Findings.
- RCE and FRST held an exit meeting with SIG.

3 VALIDATION AND VERIFICATION FINDINGS

3.1 Project Boundary and Activities

The Project area is located on 15,356 acres of upland forests in the Upper Peninsula of Michigan. GHG emission reductions for the Project are quantified by comparing actual onsite carbon stocks against modeled baseline onsite carbon stocks and baseline carbon in harvested wood products. The difference in these Project and baseline carbon stocks year over year is the basis for calculating the Project's primary goal of maintaining and enhancing forest GHG pools.

The Project's temporal boundary is the crediting period from February 13, 2019 – February 12, 2039.

3.2 GHG Sources Sinks, and Reservoirs

Table 1 shows the GHG emission sources included in the project boundary based on the Methodology. RCE confirmed that the Project Plan appropriately identifies the offset project boundary and includes all relevant SSRs.

Table 1. GHG Emissions Sources

Source	GHG	Description
Above-ground biomass	CO ₂	Major carbon pool for project activity
Below-ground biomass	CO ₂	Major carbon pool for project activity
Standing dead wood	CO ₂	Major carbon pool in unmanaged stands for the project activity
Harvest wood products	CO ₂	Major carbon pool for project activity
Market Effects	CO ₂	Reductions in project outputs due to project activity may be
		compensated by other entities in the marketplace. Those emissions
		must be included in the quantification of project benefits.

3.3 ELIGIBILITY

3.3.1 ACR Eligibility

RCE confirmed the following ACR eligibility criteria listed in the ACR Standard, Version 7.0 by reviewing the project proponent's Project Plan, Monitoring Report, and calculations as well as other supporting documentation described throughout this report (a full list of documents reviewed is in Appendix A).

- Start Date: The project start date is February 13, 2019.
- Minimum Project Term: The minimum project term is 40 years.
- Crediting Period: The crediting period is 20 years as specified by the Methodology, February 13, 2019 – February 12, 2039.
- Real: RCE confirmed that the GHG reductions follow the ACR methodology and are verifiable.
- Emission or Removal Origin: RCE confirmed that KBIC and ILTF own and has control over, or document effective control over the GHG sources/sinks from which the emissions reductions or removals originate.
- Offset Title: RCE confirmed that title to all emission reductions from the Project are owned by the Project Proponent (ILTF).
- Additional: RCE confirmed that the project is additional as described in Section 3.4.
- Regulatory Compliance: RCE confirmed that the Project was in compliance with all applicable regulations.
- Permanent: RCE confirmed that the Project correctly applied the ACR Tool for Risk Analysis and Buffer Determination to account for permanence. A total risk score of 16% was confirmed.
- Net of Leakage: RCE confirmed that the Project correctly accounted for leakage per the Methodology.
- Independently Validated and Verified: RCE is a third-party validation and verification body that the project proponent has contracted to validate and verify the Project.
- Environmental and Community Assessments: RCE reviewed project impacts as described in section 3.6 of this report.

3.3.2 Methodology Eligibility

RCE reviewed the Project against the ACR Methodology eligibility and applicability conditions and confirmed the following:

- The Project is on lands not federally owned.
- KBIC controls the timber rights on the forestland and can legally harvest.
- The Project does not have commercial timber harvesting occurring on or after the project start date.
- The Project is on tribal lands.
- The Project is not on public non-federal lands.
- The Project does not use non-native species where adequately stocked native stands were converted for forestry or other land uses after 1997.
- The Project has not drained or flooded wetlands on or after the project start date.
- KBIC owns the land and timber rights and transferred all carbon credit title to ILTF.
- The Project's stocking levels will increase well above the baseline conditions for the duration of the Project and by the end of the Crediting Period.

3.4 Additionality

The Project meets the requirements for the demonstration of additionality specified by the ACR Standard and the Methodology.

3.4.1 Regulatory Surplus Test

RCE confirmed that there are no existing laws, regulations, statutes, legal rulings, or other regulatory frameworks in effect as of the start date that requires the Project activity and the associated GHG emissions reductions; thus the Project passes the regulatory surplus test.

3.4.2 Common Practice Test

The Project area is most similar to industrial forestland, which is most common for private lands in the region. Private land is typically heavily clearcut to maximize NPV. With Project implementation the forestland carbon stocks will exceed the common practice found in the region.

3.4.3 Implementation Barriers Test

The Project chose to assess the financial barriers test per the ACR Standard and Methodology. RCE confirmed that carbon funding is reasonably expected to incentivize the Project's implementation. Due to the Project being implemented, KBIC loses the ability to monetize timber harvests during the life of the Project. SIG provided a financial assessment comparison of NPV between the baseline scenario with harvesting and the project scenario without harvesting but including revenue from carbon credits. Without carbon funding the project scenario NPV is zero compared to a positive NPV for the baseline scenario with harvesting.

3.5 PERMANENCE

RCE confirmed that the Project correctly applied the ACR Tool for Risk Analysis and Buffer Determination to account for permanence. A total risk score of 16% was confirmed.

3.6 LEAKAGE

RCE and FRST confirmed that the Project correctly accounted for leakage. The Project demonstrated that that there is no activity-shifting leakage since there is an entity-wide management certification that covers all entity owned lands. The Project also correctly accounted for market leakage per the Methodology – since wood products decreased by greater than 25%, the market leakage is 40%.

3.7 Environmental and Community Impacts

The Project Plan includes a summary of the Project activity's net positive environmental and community impacts. The Project will provide environmental benefits including carbon sequestration, habitat protection for wildlife, trees, and plant species, water quality protection, and reduced soil erosion. The Project is not expected to cause any negative environmental impacts.

Sustainable Development Goals

Table 2. SDGs

Goal	Impact	Rationale	RCE Conclusion
	(+, -, N/A)		
GOAL 1: No Poverty	N/A		Not included.
GOAL 2: Zero Hunger	N/A		Not included.
GOAL 3: Good Health and	N/A		Not included.
Well-being			
GOAL 4: Quality Education	N/A		Not included.
GOAL 5: Gender Equality	N/A		Not included.
GOAL 6: Clean Water and	+	By maintaining forests and	Project will provide
Sanitation		ensuring sustainable forest	this benefit.
		management the project reduces	
		erosion and non-point source	
		water pollution.	
GOAL 7: Affordable and	N/A		Not included.
Clean Energy			
GOAL 8: Decent Work and	+	By maintaining forest, habitats,	Project will provide
Economic Growth		and recreational opportunities	this benefit.
		the project contributes to	
		tourism, an important resource to	
		the local economy.	
GOAL 9: Industry, Innovation	+	The project provides a new	Project will provide
and Infrastructure		revenue.	this benefit.
GOAL 10: Reduced Inequality	N/A		Not included.
GOAL 11: Sustainable Cities	+	By maintaining forests and	Project will provide
and Communities		ensuring sustainable forest	this benefit.

GOAL 12: Responsible Consumption and Production	N/A	management the project sustains the character and economic viability of local communities.	Not included.
GOAL 13: Climate Action	+	By maintaining forest and ensuring sustainable forest management the project increases sequestration of carbon.	Project will provide this benefit.
GOAL 14: Life Below Water	N/A		Not included.
GOAL 15: Life on Land	+	By maintaining forest and ensuring sustainable forest management the project protects habitat benefits both within the project area and the larger landscape.	Project will provide this benefit.
GOAL 16: Peace and Justice Strong Institutions	N/A		Not included.
GOAL 17: Partnerships to achieve the Goal	N/A		Not included.

3.8 LOCAL STAKEHOLDER CONSULTATION

No formal stakeholder consultation occurred since the Project is held on private tribal lands.

3.9 Monitoring Plan

The Project Plan includes a Monitoring Plan that identifies all monitored data and parameters. RCE confirmed that the monitoring parameters and approaches conform to the methods required by the Methodology. The plan includes all relevant data parameters and appropriately identifies units of measurements, data sources, methodologies, uncertainty, monitoring frequency and procedures, and QA/QC procedures. After discussions with SIG and reviews of project documents, RCE determined that the Monitoring Plan accurately reflects how Project data is monitored and recorded and there are no deviations relevant to the Project activity against the requirements of the Methodology. ILTF and SIG implemented the monitoring plan as stated in the Project Plan during Project activities.

3.10 BASELINE SCENARIO

The Project's baseline scenario represents harvest levels that maximize the net present value (NPV) at a 5% discount rate (for Tribal Land) subject to KBIC's existing harvest constraints, which limits harvest regimes to be more conservative than typical practices in the project region. The baseline also includes restrictions due to Michigan State Forest Practice Laws.

The Project's baseline model simulates a range of harvest types and rotation lengths based on legal requirements and simulated growth within each stratum. The objective of modeling was to determine

possible timber harvests in the project area over 100-years within the framework of legal and reasonable harvest constraints.

Stands were modeled for different prescriptions including no harvest and clearcut.

ILTF and SIG utilized the USDA's Forest Vegetation Simulator (FVS) Lake States variant to model harvests and yields. Growth models were calibrated using site index values obtained from tree cores of dominant/codominant species located in or close to project plots. With this site tree data, Carmean site index curves from GTR 88 and 128 were then used to calculate site specific indices to appropriately calibrate growth. The process was confirmed to be consistently and systematically applied to each plot.

RCE reviewed the resulting baseline outputs to ensure that they reflected the modeling objectives and the legal additionality requirements. The model grows trees and volumes at a reasonable rate compared to regional averages.

3.11 On-site Inventory Verification Check

In preparation for and during the site visits, the Verification Team reviewed evidence necessary to verify Project inventory estimates.

The Project inventory consists of a single forested stratum. The Verification Team confirmed that stocking and vegetation were consistent with the description in the inventory data and the Project Plan. FRST chose plots per a random sampling method.

The current inventory contains 217 permanent, fixed-radius plots. At each plot location, trees were measured in two nested plots: a larger 1/24th acre plot with radius of 24 feet, and a smaller 1/300th acre plot with radius of 6.8 feet. The larger plot measured all trees greater than or equal to 5 inches DBH while the smaller, nested plot measured all living trees between 1-4.9 inches DBH.

Given this sample design and Project size, the Verification Team was required to achieve a minimum of eleven successful plots within the project to successfully verify inventory stocking levels. The Verification Team successfully verified site data after measuring a total of 12 site plots. The Project passed the t-test during the first site visit.

Project Area

During the site visit, the Verification Team conducted boundary-line reconnaissance by visiting Project boundary edge lines and points, plotting edge points with GPS receivers, and determining whether there were discrepancies with the digital Project boundary files provided by SIG and the physical boundary witnessed on-site. This was done to determine the risk that Project area inaccuracies could contribute to a material misstatement in Project emission reductions. To the extent feasible, the Verification Team confirmed that the Project area boundary was appropriate and accurate.

3.12 Project Data and GHG Emissions Reduction Assertion

RCE reviewed the Project Plan and Project data and calculations to ensure that appropriate equations were used in calculating baseline emissions, project emissions, and net emissions reductions.

3.12.1 Baseline Emissions

RCE and FRST confirmed that the baseline emissions were correctly calculated. See more detail in section 3.9.

3.12.2 Project Emissions

RCE and FRST confirmed that the project emissions were correctly calculated.

3.12.3 Emissions Reductions

RCE verified that SIG calculated emissions reductions according to relevant Methodology equations and that the methods are included in the Project Plan.

RCE and FRST assessed quantitative uncertainty of the emission reduction calculations and the methodologies and applicable data sets and sources. RCE and FRST confirmed that the Project has appropriate measures in place to address uncertainty and that the sampling error associated with the mean of the estimated emission reductions/removals was less than +/-10%. RCE and FRST also confirmed that all defaults, projections, and other data used were correct and consistent with expectations.

RCE recalculated emissions reductions for the first reporting period according to the equations defined in the Methodology and the Project Plan and found the Project assertion to be free of material misstatement.

4 VALIDATION AND VERIFICATION RESULTS

RCE developed a combined List of Findings for both the validation and verification. The List of Findings noted all corrective action requests (CARs), non-material findings (NMs), additional documentation requests (ADRs), clarification requests (CRs), and recommendations for improvement (RFI). ILTF and SIG appropriately responded to all items in the List of Findings. The List of Findings is provided as Appendix B.

5 VALIDATION AND VERIFICATION CONCLUSION

RCE conducted a risk-based validation and verification of the ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project that included a strategic review of the project data, documentation, and emission reduction calculations. The objective of the validation activities was to assess the project design, baseline scenario, and monitoring plan and to ensure compliance of the Project Plan to the assessment criteria defined in Section 1.5.1. The objective of the verification activities was to conduct an independent assessment of the Project's initial reporting period and resulting ex-post GHG emission reductions.

Based on the review and the historical evidence collected, RCE concludes to a reasonable level of assurance that the Project's GHG assertion is free of material misstatement. The emission reductions resulting from the reporting period February 13, 2019 – June 30, 2021 can be considered in conformance with the:

ACR Standard, Version 7.0 (December 2020)

- ACR Validation and Verification Standard Version 1.1 (May 2018)
- Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non - Federal U.S. Forestlands v.1.3, April 2018
- Errata and Clarifications Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non -Federal U.S. Forestlands v.1.3, September 30, 2021
- ISO 14064-3:2006 "Greenhouse gases Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions"

Table 3 provides a summary of the emissions reductions.

Table 3. Total ERTs

Vintage	Removal ERTs (mtCO ₂ e)	Other ERTs (mtCO ₂ e)	Net ERTs (mtCO₂e)	Risk Buffer (mtCO₂e)	Total GHG Reductions and Removals (mtCO2e)
2019	27,556	108,953	136,509	26,002	162,511
2020	31,333	123,888	155,220	29,566	184,787
2021	15,452	61,095	76,547	14,581	91,128
Total	74,340	293,936	368,276	70,149	438,425

Note: Totals might not sum due to rounding.

Lead Verifier Signature

Zach Eyler

Internal Reviewer Signature

Phillip Cunningham

APPENDIX A—DOCUMENTS REVIEWED

- 1. ACR634_KBIC_GHGPlan_series
- 2. Buffers png
- 3. CarbonProjectTSRs
- 4. CulturalZones png
- 5. KBIC Carbon inventory manual_series
- 6. KBIC carbon project MOU [signed by all parties] (4)
- 7. fdl carbon tractlist march2021
- 8. KBIC DevelopmentData 20210930 geodatabase
- 9. KBIC_Geospatial20210817 geodatabase
- 10. KBIC_IRMP-101817
- 11. KBIC Monitoring Report RP1 series
- 12. KBIC_ProjectArea_20211117V2 geodatabase
- 13. KBIC_StrataData_20211013 geodatabase
- 14. KBIC_StumpageValues_Feb2021
- 15. KBICDevelopmentData_20210415 shapefiles
- 16. GTCF_KBIC_Audits
- 17. GTCF KBIC Carbon TreeList 12-28-20
- 18. ILTF_KBIC_Carbon Agreement signed ILTF 2020.12.08 (1)
- 19. ILTF_KBIC_PC277_Invoice1001_1_9_2019
- 20. ncsm_northern_hardwoods
- 21. PC368 KBIC Quant Files 20210922
- 22. PC368 KBIC01 GIS Acres Plots series
- 23. PC368 KBIC02 SiteIndexforPlots series
- 24. PC368 KBIC03 FIA BdFt Defect series
- 25. PC368_KBIC04_FVS_December2020_PlotAvgs_Strata_series
- 26. PC368 KBIC05 Degrowth series
- 27. PC368_KBIC06_FVS_January2019_PlotAvgs_series
- 28. PC368_KBIC07_RxInputs_series
- 29. PC368_KBIC08_RxRegn_1YrMlts_series
- 30. PC368 KBIC08 RxRegn 5YrMlts series
- 31. PC368_KBIC09_1Yrto5Yr_BAlmults_series
- 32. PC368_KBIC10_Stumpage_series
- 33. PC368_KBIC11_FVS_AvgDefect_series
- 34. PC368 KBIC12 LPA Baseline MaxNPV series
- 35. PC368_KBIC13_LPA_NoCut_series
- 36. PC368 KBIC14 ERTs Strata MaxNPV series
- 37. PC368 KBIC15 FVS Dbs Keys outs series
- 38. PC368_KBIC16_Monitoring_Report_series
- 39. PC368 KBIC17 MerchPercentages series
- 40. RipnAcres100 png
- 41. Rxs_CC1yr1stDecade_series
- 42. Rxs CC1yrOtrDecades series

- 43. Rxs_CC5yr_series
- 44. Rxs_Project_NoCut_series
- 45. Spatial Informatics Group, LLC Mail Title Status Report tribal ownership
- 46. StumpageDef_20211105 png
- 47. SusYldDef_A png
- 48. Voluntary Project Start Date

APPENDIX B—LIST OF FINDINGS

Includes Corrective Action Requests (CAR), Non-Material Findings (NMs), Additional Documentation Requests (ADR), and Clarification Requests (CR), as necessary.

Corrective Action Request, Additional Documentation Request, or Clarification Request ID#	Finding	Client response	RCE response	Additional Client response	Additional RCE response	Additional Client response	Additional RCE response	Additional Client response	Additional RCE response	Open or Closed
CAR 1	Numerous plots seem to incorrectly be reported as null due to broken defect links in PC364_K804_RP1_PlotAwgs_20210606.xisx (at least in our copy). Please update.	This file is a little odd because the linked file '00' must also be open for the links to update.	Thank you for providing a new document. This item may be closed.							Closed
CAR 2	In 'PC364_KB14_ERTs_Final_20210826' on the Tab E5.1,2 there is a calculation issue with the distribution of days for 2021. Cell E5, is dividing the two subtracted dates by 356.	Cell E5 in "PC364_KB14_ERTs, Final_20210930" has been changed from 356 to 365. Files are located: RCE_KBIC_Shared/10_Quant	Thank you for making this correction. This item may be closed.							Closed
CAR 3	In 'PC364_KB14_ERTs, Final_20220112' on the 'Tab E5.1,2' there are no uncertainty values included in cells A43 and A44. This is necessary for proper quantification.	This has been corrected in file PC364_K834_ERTs_Final_20220131 and did not change the # of ERTs.	Thank you for making this correction. Further 'Tab E.S.1, 2' items are being tracked via email exchange. This item may be closed upon their resolution.	This has been corrected in file PC364_KB14_ERTs_Final_20220207.	This has been confirmed. This item may be closed.					Closed
CAR 4	in ACRS37_RBC_GHGPlan_2022_00_11" there are issues: Page 3.6 the Buffler Pool Contribution 15% x 1.299.722 - 183_376, where deem's the core from, it decem's pages at to match any buffler contribution values? Page 28, Table X 1.19 Ved one not match the 2020207 wersion. This NRV value shows up again on page 44 under accession straves MRV. Page 3.3, Delect Table, per that applicated inventory defect is rape 3.0, Delect Table, per that updated inventory defect is page 4.6, the COS 255 state table inference for 1806 is a previous version (2021:0513) than current.	Provided clarification and corrections via email.	Confirmed, this term may be closed.							Closed
NM1	on "TPGAS, ASSA, 2025, \$PPP-No. 20253555 The will effective and see the military and the contract of the military and the contract of the contract (CLCC). The project is located in Michigan, and should be using the northern late states mill efficiencies.	Inc364, ISSE, 2021, Priminals, 2021/2028 also and PC364, ISSE, 2019, Priminals, 2021/2028 also have been updated for the correct mill efficiencies. Files are located. ECE_ESE_Denoid/20, Quant	Theret you for providing threat documents. After review, there are minor discrepancies within quantification. When the provides Management agend? Not 27 15 conds, here the Management was the provides of Princis shallows Princis 200, 2000000° has a filt or that of 27. Note that the principal control of Princis shallows Principal 200, 2000000° has 80 of 200, 200000° has 80 of 200, 200, 200, 200, 200, 200, 200, 200	Sharppase, MSD Wind and Anahomy have been updated in file Trust volumes. PCE 196; 29:21255-las. MSD mill dips or hive MSDL/Process And Anahomy have been been proceed to the process of th	These you for copting these values and incorporating the two making used slips into the NID quantification, they have been conformed. He was values greatly the property of the Space-comment of the Value of Valu	Each of these discrepancies have been published from First Youthern First Fact Volumes. Proc. 15(4), 1873-1873, 1874-1873, 1873-1874, 1874-1874	Thank you for these corrections. These changes have been confirmed.			Closed
ADR 1	in the GHG Plan the QA/QC procedures are described for field measurements, including "5% of the plots are checked by a different forester than cruised the plot."	The plot audit file (GTCF_KBIC_Carbon_Audits_1-11-21) is located here: RCE_KBIC_Shared_12_Findings Responses	Thank you for providing this document. This item may be closed.							Closed
ADR 2	Plaace provide the evidence for which plots were QA/QC'ed. Plaace provide any cruise cards or other data source that predate the treelist in FDL00 that could be available for	See 'GTCF_KBIC_Carbon_TreeList_1-18-21.elss' & GTCF_KBIC_Carbon_Phase2_TreeList_4-20- 21.sisc* Files are located here: RCE_KBIC_Share@f10_Quant	Thank you for providing these documents. This item may be closed.							Closed
ADR 3	What is the basis of the 52.00MeF value applied for Road Maintenance in the Baseline Consumo?	This has been removed from PCSM \$312,159, Baseline, ManNPV2,20220326.slob* Files handled here Ref., SNC_Shared/10, Capard	The methodology state: "Required injust for the project NPV calculation wholes the results of a recent trimler invention of the project News, price and the project state, price register, and the project state, price register, and the project state of the project state of the project state of the project state of the price of the project state of the project state of the price of	The economic unit of value modeled was the sturngage value. Sturngage value is definition include at these \$filled costs. Therefore including a separate \$filled cost are reductable.	Please provide a description from the MI DNR that describes all of the costs associated with determining the temples values. For concentration is that timings values. For concentration is that timings can encompase all associated toxic or is simply desired price minus largest and reciting. Please also justify that titumpage information that timines sales is applicable to private timber sales.	The units tomber calce on a stempage basis and uses the 60 DBH as a gales for what they should expect to receive in bids. The local commy's flavage, but the deal times is games and in emissing several species, therefore I used data for mixing several species, therefore I used data for the Upper Premission, also secreembed autompage_vole (a) g	stumpage_mota_gif has not been provided as of 1737/2022. **Place provide the source URL for the stumpage centralist. **We are triple to searcrism white costs are included in the Country's stumpage whele: cursor pure source country stumpage whele presumably require the log purchaser for carry the cost of read building from where the access white requirement to consider. "reading and the restrict requirement to consider." reading and the restrict country stumpage. The consideration of the consideration of the consideration of the conside	Compage_Mote jig has now been provided. See See See See See See See See See S	These modifications have been confirmed and independently writted by HST. The tern may be closed:	r. Closeid
ADR 4	Please provide supporting documentation for substituting the site index parameters of black ash in for E. Hophornbeam in 74:364_K802_SteindersforPlots_20230510*.	E. Hophornbaam is a medium claed understory tone, rawly becoming dominant or codominant. https://www.srk.suda.gov/pubc/misc/ag_654/volume_2/costrys/orginisna.htm. Black Aub hances these characterisms. Black Aub hances these characterisms. Black Aub hances these characterisms. The second second second properties of https://www.srk.suda.gov/pubc/misc/ag_654/volume_2/finansis/figgs.htm. There is only 1 part of film species, and its six list is very low at 31.37. The large list of all hardwood species (using the same aga and height) is 30.30, or about 15 lisower.	Thank you for this clarification. This item may be closed.							Closed
ADR S	Please provide any and all documentation relating to the harvested areas, including shapefiles.	Doppelfies showing harvest areas can be found in "EBC_PropositioundaryData" geodetahous, located here ISC_ESIC_Shared/T_GGS	Thank you for providing this shapeful. The depicted harvest appears to be one area, however, "Trust solumes PTS_50_2020835", six see named harvest. Please provide additional agastal files that depict the ten reported harvest.	NBC provided additional spatial files that depict the harvest in more detail. These files "NBC, glower," Self-222 and NBC, harves, 200.2.27" can be found have file files "Devero", Self-222-2222 revent.	Thank you for providing all of this sidelicinal datal and context on harvests. After comparing harvest contracts and the provided GIS shapeful REIC, harvest, 2022-27; there appear to be harvest blocks included in the sol	See Rie ADR, 5, Harvettlair, MIRSips size for info on unit (timing. There was some harvest within RP1 in Contra and barbano, but most of those 2 are getting logged in RP2. Trust volumes, RPW calcs, RTR1 and the monitoring report have been updated.	We have not been able to find this file as of 1/12/2022.	This file has been added to the /MIT Sign folder	Thank you for providing this additional information. All parts of the item may be closed.	Closed
ADR G	Please provide a spatial file of the entirety of the IBIC commenting and a description of how the field a groups can be determined, whole my best layer port areas and determined, whole my best layers the law to the control of the control of the baseline model.	Diagelfics showing the entirety of the REC commenting and leased land that were excluded can be found in "REC", Projection-under Paris, "geodesiane, located-leve LEC, 2016, "Develot"), CES Transition, and the project see was determined for first taking all however located by REC in text of the commenting seed as automorm Leon's with more than 2016 total commenting, Leon's look over these excluded as well as all non-firested lands. The resulting boundary was used for the project area.	ther working through the Cfd, three are a copie of questions: The EELP, rejection-unit-privated, 20201051 layer has a sool arrange of 12-40. 2020, 202	The total project area acreage is 15.356, which matches the acreage being used in	Thank you for this change and consistency within elecuments, issue closed.					Closed
ADR 7	Please provide an updated version of PC364_K800_GTCF_KBIC_Carbon_TreeList_20210420.xlsx that includes plot 165.	Plot 165 is a beaver swamp that the cruiser noted as non-forest, thus it is not part of the project area.	If plot 165 is no longer included within the project area, please remove it from all calculations, including access database PVSOD At RP1, FVSOD Grow Cruse, KBD3 FVS Average, and any other document.	Plot 165 has been removed from all quant excel files.	Thank you, the plot has been removed from most excel/access files. It still remains in some documents that do not effect quantification, so this item has been transitioned to a recommendation for improvement (RFI). This ADR is closed.					Closed
ADR 8	In 'Trust volumes PY21_SIG_20210831' there are two harvests called Mongoose and Awkay with cord tonnage and sugar maple MBF, but without an explicit data reference, including date. Please provide if available.	A screenshot (Mongoose, Awkay, Harvest, jeg) of the original Trust columes FY21 file with those table has been provided. This file had sweral errors and extraeroos data and was thus not included in the file submission. Files are located here: RCE_XRIC_Shared/10_Quant	Thank you for providing this context and screenshot. This item may be closed.							Closed

	In 'PC364_KB12_LPA_Baseline_MaxNPV2_20210826' on the MODEL tab there is a Baseline Minimum harvest of						
ADR 9	the MODEL tab there is a baseline Minimum harvest of 2/3*3566 on cell AG13. Where does the value of 3566 come from? The GHG Plan mentions an optimal harvesting of 2.4 MMBF/pear which is roughly the answer of 2/3*3566-2377.	The constraint was set to 2/3 of the tribe's current annual allowable cut of 3,566 MBF/yr (The AAC is per Rachel McDonald). Email documentation "KBIC_AAC_McDonald" are located here: RCE_KBIC_Shared/10_Quant	Thank you for providing this context supported by a screenshot. This item may be closed.				Closed
ADR 10	Please provide source data for the harvest quantities listed in 'Trust volumes FY21_SIG_20210831'.	All mill slips are located here: RCE_KBIC_Shared/10_Quant/Mill Slips	Thank you for providing these documents. This item may be closed.				Closed
CR 1	Please provide justification for why Gross CF is calculated by dividing by the defect percentage. If St comes from MCulf from PS with this note PNIST brace defect and broken tops were deleted from PS_T releter? It would seem that MCulf as catually Gross CF and Met CF sould be Gross CF *Pxt Sound. Please also clarify why the defect assessment is familed to the mire chantable portion of a stem and not the whole tree.	The division was an enflict of an earlier study(s) and has been removed in tile TC(364, 260), TVS, Aug/Defect, 20210505: The inventory follows TRx Y Di protocols which call for clidate Cfrom the aturup beight to a of "Eq. to been my experience that other than broken took, the study of the control of the Cfrom th	Thank you for this clarification. Verifier has confirmed proper new calculation. This item may be closed.				Clericed
CR 2	In the document VC364_K812_LPA_Baseline_MaxNPV2_20210616' on the FVS_C_HRY tab row 1521 the data is not included in columns A:C. Why is this?	This was an oversite and has been corrected in file "PC364_K803_FVS_AugDefect_20210826" File is located here: RCE_KBIC_Shared/10_Quant	Thank you for making this correction. This error is still occurring within the PROJECT document.	This has been fixed for the project in file PC364_KB13_LPA_Project_Nocut_20210930.xisb. Files are located here: RCE_KBIC_Shared/10_Quant	Thank you for making this change, issue closed.		Closed
CR 3	In the document PC364_KB00_GTCF_KBIC_Carbon_Treelist_20210420' on the 'SpeciesComp' tab the pivot table needs to be updated.	PC364_KB00_GTCF_KBIC_Carbon_TreeList_20210826' has been updated File is located here: RCE_KBIC_Shared/10_Quant	This 0826 document has not been provided, but the most recent edits made in the 0420 version satisfy this IL item. This item may be closed.				Closed
CR 4	In the document YCS64, MEI Stumpage, 2020/SEI or the gived Yub, why is the only location filtered by the TVPPER PERMISSION. Vicantion and not one of the other potentially applicable units this large Management Unit? And are values: Booger Made (922)-373, Red calk (5124.2), and Red Majok (\$202.85) realistic? Particularly when considering all of the other stumpage prices being less than 550.	The Upper Perinsula is the regional warrage, which includes Barage, and which has about 7 times the volume sold. This provides a more robust estimate of stumpage prices as used from this property is lakely to be sold in any off the four neighboring counters. The high stumpage values for those species reflects harder visitation or pallet and pulp utilization.	Thank you for this clarification. This item may be closed.				Christ
CR 5	In the document 'PC36A_KB11_Stumpage_20210513' on the 'tblLkupStumpage' tab, why is the value for Green Ash being used in place of the listed value for white ash when a value for white ash has been calculated?	The value for white ach in file "PC364_KB11_Stumpage_20210613' correctly reflects the white ach record in the pivot table. File is located here: RCE_EBIC_Shared/10_Quant	This It, Item is referring to row 6 - "white ash", "WA", and species ID '232", despite the stumpage quantification in this row representing Green Ash values. Please update for consistency in records.	PC364_KB11_Stumpage_20210930.xlsx has the corrected label. Files are located here: RCE_KBIC_Shared/10_Quant	Thank you for making this change, issue closed.		Closed
CR 6	Why was only the time period of '01-01-2021 to 03-31- 2021' in the 'PC364, KB11_Stumpage_20210613' document used in determining stumpage prices when other quarterly reports were also available by the provided link in the Quant_Files document?	At the time the greenhouse gas plan was developed those were the most recent prices.	Thank you for this clarification. This item may be closed.				Closed
CR 7	In 'PC364_KB14_ERTs_Final_20210621' on the 'MRpr' tab there is no quantified values of Harvested Wood Products, despite the verifier visiting an active logging landing on the site visit. Why aren't HWPs being quantified?	File PC364_K355_RP1_HWP_20210826 has been developed with these values. File is located here: RCE_KSHC_Shared/10_Quant	Thank you for developing this quantification, see other IL items for inquiries. This item may be closed.				Closed
CR 8	is the tab MoDEL* of PVS64_REJ_UP_Baseline_MandMV2_20220516* there are prescriptions of PVS_C_A0_LIVE* tab being skipped. There are 2.86 distinct prescription rows in PVS_C_A0_LIVE* tab theirs skipped. There are 2.86 distinct prescription rows in PVS_C_A0_LIVE* but only 2.694 are being incorporated into the MODEL* to A. A. sampling of some of the prescriptions left out is in the next tab in this file (ICR 8) where the column A is the row on the PVS tab.	This has been convected in tab MOOIL: of file YC364, RB12, IPA, Baseline, JManNPV2, 2021082F File is located here: RCE, YBEC, Shared/Tab, Cassed	Thank you for making this correction. Please make the same correction in PCS64_E013_IPA_Project_Nocur_20230926.	This has been fixed for the project in file FCS4_KES_JUN_Project_boos_2022993.adu. Files we located here: FCE_EXE_Dates(FIX_C)pairs	Client and FRST had a phone call discussion on 11/4. These changes have been made on the Baseline document (BS12) but not the Project (RS13) document for the AGE, for all Dead quantification. As final baseline carbon is unaffected, this item may be moved to an RF.		Cusad
CR 9	in the tab YVS_C_AG_DEAD' of YSSA_RSI_DM_Bassiene_Man8VV2_20210616 plot 128 is missing entirely from the fail. It is included in the YSS_C_AG_DEAD_AN' tab but it included in the YSS_C_AG_DEAD_AN' tab but don't make it to the list used in calculations, slwy's this?	Plot 128 is connectly listed on the "PPS_C_MG_DEAT tab in rows 1,729to 1,744 File is located here: RCE_SBAC_Shared(2)C_Quart	in ration to InSECTION. For the InSECTION Phys. The given of concern is 228. For both InSECTION and PROJECT. For both InSECTION Phys. The given of concern is 228. For both InSECTION Phys. The given of the board precorpions for gist 95 fbs. 130059999995900000, and gist 2008 fbs. 15120999999595900000 in the FYES, CAA, GEALD, And YAY, CAA, GEALD Fact, And the moment the MODEL tab service cut the status from given in ETRIOT statement (col. 18), but And preporations are discussed and the Section Phys. Interest (col. 18), but All preporations are discussed and the Section Phys. Interest Value from the Literate have revised by including all model outputs, even in instances of and results.	Pricts 55 and 200 do not have any measured street, and 56 does not add any agents, that there wish any seal COS to report. They are included in the Prict, Col. (Left Ed., with 0 COC), to the correct savage will show up in the D.	Thank you for removing this from the Buseline document. The prescriptions are still missing an order of reject document, but direct they have been discrated here and so not impact overall carbon this item may be moved to an RFI.		Cross
CR 10	In "PC364_KB12_LPA_Baseline_MaxNPV2_20210616v" on the MODEL tab, the value used for the "20-year Baseline" in cell GH4 only averages 5 years of live stocks, not 20. Please clarify.	This has been corrected in file MODEL' of 'PC364_KB12_LPA_Baseline_MaxNPV2_20210826' File is located here: RCE_KBIC_Shared/10_Quant	Thank you for correcting this. This item may be closed.				Closed
CR 11	Please clarify. In "PCS64, KB12, LPA, Baseline, MaxMFP/2, 202106164' on the MODEL tab, the value used for the "Cut CO2, AG+86-Yops" seems to be quantified on odd years, and then copied into the preceding even years included of quantifying into those years as well. Please clarify.	This has been corrected in tab MODEL of File "PC364_WB12_UPA_Baseline_MacNPV2_20210826". Also the ratio of total live to merch CO2 was recomputed and will be used in the RP1 stocking calculations in the REF file 34. File is located here: RCE_ERIC_Shared/10_Quant	is the ratio of total live to merch live the reason for model outputs being divided by 2.134751? This value does not appear in our version of the defect calculations.	The ratio is computed in file O4, and applied in the HWP files 16, not the baseline LP.	This value is no longer incorporated into the Baseline in this area, issue closed.		Closed
CR 12	In PC364 KB12_IPA_Baseline_MacNPV2_202105156' on the MODE! to Journe KS closus the calculation of the year 2029, referencing the PVS_C_HRV tab column O. Columno O is data for the year 2034, as there is no output column for 2025 in PVS_C_HRV Plases clarify whether this is labeled correctly and whether scaling to a year value is appropriate.	Harvest year 2020 has been removed from the harvest year section, in tab MODEs of file PCSsC, (ESI J DA, baseline, ManNPV2, 202100307 File is located here: REE_ESIC_Depend IRE_Quark	Thank you for making this change. Please make the same correction in PC364_RB13_IPA_Project_Nocut_20230826'.	This has been fixed for the project in file PC364_XB13_UPA_Project_Nocut_20220930.xlsb. Files are located here: RCE_XBIC_Shared/10_Quant	Thank you for making this change, issue closed.		Closed
CR 13	in PC363 KB12 LPA Baseline MadRPV2 20210656/ on the MODE tab, in the quantification of yearly clearcut acroages, there appear to be two issues. The first is from 2028 to 2034 is 6 years, not the five used in 8114. The second issue is the successive values (BMH-8114) are of intervals of 10 years, but the summed values are only being divided by 5. Similar issues are occurring at the "Hrv-Acres column DW.	This has been corrected in file MODEL' of YCSF4, IEEE2, LPA, Baseline_ManNPV2_20220305* File is located here: RCE_SEE_Shared/20_Quart.	Thank you for making this change. Please make the same correction in PCISE_ESS_TAN_INSPICE_MEET_20220826	This has been fixed for the project in file FCLS4, ISS1_IVA, Project_Incor_2022995.elsh. Files we located here: ICL_ENC_Share/Fig. (quart	Thank you for making this change, issue closed.		Cleaned
CR 14	in YC564_R31_UPA_baseline_MeanPV2_202206164* on the MODEL to these appears to be incontributed with the appearance of the incontributed with application of 187 southward graduate and the application of 187 southward graduate and the Application of 187 southward graduate and the incontributed graduate and the TSF, and YSF southward graduate and the TSF southward graduate and the ADV see Calculation, the cells but then it need used again the resid of the 500 year prograduate. Whereas the ADV see Calculation, the cells office (London and Calculation), the Calculation of the ADV see Calculation that cells office (London and Calculation). The Calculation of the Calculation o	Smoothing occurs because the diff-decadal years are the everage of the proceeding and proceding printing-based printing and proceding and proceding printing-based printin	For both MCELTING and PROCES documents (MS13 and KS13). This has occurred in all counties proces for the Streeting MMP calculations (Fx, FZ, GB, GD) on the MODEL tab.	This has been fined for the project in file. FCM4-(4312) JP, Brycet, Toology 200900.000 and the baseline in FCM4-(4312) JP, Brycet, Manual PSD 2003000.000 Files are located here: RCE_ESC_Obsect(27)_Quant	thank you for making this change, issue docad.		Cross
CR 15	In PCSG KB12_UPA_Baseline_MashPiv2_20210515' on the MODEL tab, in the allocation Of C. carves in the Standing MBF calculation, the acres used for 2019-2028 are doubled up instead of referencing the actual yearly acreage from the CC acres section. For example: cell F021_(2020) is the same value as FC21 (029), instead of the actual value on cell 8C14.	This has been corrected in the MODEL of YC364_KE12_UPA_Baseline_MackUPV2_20210505' File is located here: RCE_KENC_Shared/10_Quant	For both BASELINE and PROJECT documents (KB12 and KB13): The value in RN21 is in the column for 2009, but comes from the column for 2004. Would it be more appropriate to assign it the same value for 2008, instead of 2034?	The clearcut acres are solved annually for ten years, then by decade. The 2nd decade is from 2029 to 2038, with each year having the same harvest. Following this definition, the formulas are correct.	Thank you for this justification, issue closed.		Chrised
CR 16	2001), instead of the actual value on cell ECL4. Per YCS44, EMD, Supposerh, 2010/2013 Fin Project Start date is 21/3/0101, and the end of the first RP date is 47/3/2010. And the end of the first RP date is 47/3/2010, and the end of the first RP date is 47/3/2010, and the end of the first RP date is 47/3/2010, and the start Chair in more than one than the control of the start Chair in the decision to proceed with the reporter action ("Chair in the ACR register) webbell, it does not appear that there is an explicit Chird Plan integrate. Planta Chird."	Please see the signed MOU between KEC, ELTP, and SIG for the curbon feesibility assessment with a signature data of 273/2750s, which shakes "vaidness that GHO minigration was reinously that this document can be used for the project start data. Files are located here: CEC, ESC, Shared, 3, Shart Date	Thankyou for providing this document, issue closed.				Cond
CR 17	Please clarify the crosswalk for serviceberry as species 356 is not included in the Lake States Variant.	Servicebarry is commonly categorized as a small tree. The one specimen cruised measured 2.3*, which is certainly small tree sized vs bush sized. The FVS species misc. hardwoods is for these types of small and minor species.	Thank you for the clarification, issue closed.				Closed
CR 18	in "Trust volumes FY21_SIG_20210831" in appears the 24.6 value for the Zeba Scotch Removal is being double counted on this Species Surmary tab. Once for HW Tonnage, and once for Cords. Is this appropriate?	Zaroed out 24.6 HW Ton for Zeba Scotch removal in Trust volumes FY21_SIG_20210930.xisx. Files are located here: RCE_KBIC_Shared/10_Quant	Thank you for making this correction, and providing the new document, issue closed.				Closed
	Tonnage, and once for Cords. Is this appropriate?						

CR 19	in the calculation of HWPs on PCSS4, R816, 2021, HWPscalcs, 202108311 it does not appear that any lived of accounting for a bank ratio reduction is applied to the calculations. ACR IRM antibiodology 3.3 states, i'm all cases, havested wood volumes and/or weights must exclude bank", are bulles provided in the Trust volumes PCS1, SIG. 202108311 already without bank? If not, applying a bank ratio reduction per species would be needed.	Bark S. Tay weight has been composed using specific grantines and bark volume ratios from Miles and Smith 2009. Bark S. weight ratio = bark S. volume ratio * (bark SG / wood SG)	Thank you for the clarification. This item may be closed.					Car	losed
CR 20	On tab 'RP1 HWP of completed harvest' of the "PCS44 R156_2021_HWP/catcs, 2022.0831" the calculations included in the Wood Products Generated section (UAS H28], how is the distribution of relative percentages into wood classes determined? for example: Row 28 SW Pulp, is attributing the products into Driented Strand Board, Nonstructural, and Miscollaneous, New this distermined?	These are based on professional experience and confirmed by KBC's Forestar. See email "WoodProductEmiRachel_20211003" located here: REC_SBC_Seared(10_Quant	Thank you for providing this context and the associated documentation. This term may be closed.					Cas	losed
CR 21	Miscellaneous. How is this determined? In 'PC364_KB13_LPA_Project_Nocut_20210826' on the PVS_C_BG_LIVE tab there is a prescription which is currently pulling a REF, S1P227:19000-10060, or row 3095. Why is this occurring?	This has been fixed for the project in file PC364_KB13_LPA_Project_Nocut_20210930.slsb. Files are located here: RCE_KBIC_Shared/10_Quant	Thank you for correcting this issue. This item may be closed.					Clos	losed
CR 22	In 'PC364_KB14_ERTs_Final_20210826' on the Tab E5.1,2 there are two standard error values that I can not find the source of in cells A43-A44. Document KB06 PlotAvgs has calculated standard errors on the CO25tats tab, but these are not the values on the ERT document.	This has been fixed for the project in file PC364_KB14_ERTs_Fixal_20210930.elsx. Files are located here: RCE_KBIC_Shared/20_Quant	Thank you for updating these fields. This item may be closed.					Clé	losed
CR 23	intersecting the shapefires MEC. Protocies, 2021/2075 and Timber (Invest), 200821 there are four price optimized within the harvast polygon, 82, 84, 85, and 88. Have these oldes been reimmentioned since the harvast, or is there another method to captured potential lost volume over time? Présace consider any other protynavest intersections after responding to ADR 5.	These plots were visited post harvest activities and no trees were removed. Email from KBIC Forester "KBIC_2021 Hervest_McDonald" can be found here: REE_KBIC_Sharve(17), Quant	Thank you for providing this context and the associated documentation. This item may be closed.					Chr	losed
CR 24	During the site visit, there was what appeared to be telection cutting as a resist of blowdown north and east of plot 213, but none of the harvest polygons cover this area. It this an area whose harvest volumes are included within the "Trust volumes PF22, Sido, 2010831? This may be accounted for in the ADR 5 response.	This is the Rabideaux harvest unit, which was already planned when the blowdown occurred.	Thank you for providing this context and the associated documentation. This item may be closed.					Clor	losed
œz.	Please clarify if the project area is subject to state regulation under under the purview of the National Model Front Resources Management Act of 1950 and 5 foot flowers and the National Professional	Regulation 25 CFH ESSI I states that all Indian forest binds reveal a regit, plan the includes a branest checked that models scattaned yield. See the products that a forest can produce continuously at a given intensity of management. The SEC products that a fivest can produce continuously at a given intensity of management. The SEC products that an indianate can of 1,56 GMH to be baseline can can see 1,55 MH to be about 2.4 MMGPyper. The baseline can dissipate the baseline can can see 1,55 MH to be about 2.4 MMGPyper. The baseline can can see 1,55 MH to be about 2.4 MMGPyper. The baseline can can see 1,55 MH to be about 2.4 MMGPyper. The baseline can see 1,55 MH to be about 2.4 MMGPyper. The baseline can see 1,55 MH to be about 2.4 MMGPyper. The baseline can be about 1,55 MH to be about 2.4 MMGPyper. The baseline can be about 1,55 MH to be about 2.4 MMGPyper. The baseline can be about 2.4 MMGPyper. The baseli	In the context of the response for ACM Spiritual (List's) the discrepancy where the ACM SS SMEET and this which is the list the company of the ACM SS SMEET and the ACM SMEET AND ACM SM	which been determined that the SNOT date out or prici have not briefly. According to ACM "Goldence for Cabbon Propost Development on Tribal Lands." ACM "Goldence for Cabbon Propost Development on Tribal Lands." In propints Infill the same behaved on the attached of but which is not page 11 off the actings for the SNOT development. The same to find that which is for the SNOT development of the same to the SNOT development of the same to some the same and stope of the document of the basis. The slope offers were the same and stope of the document of the basis. The slope offers were short systems of the SNOT development of the same and stope of the same and same a	The verifier confirms that the SBC Timber Harvest Pilin does not restrict baseline harvest modeling as confirms through ACR guidance "Varianteetherforwithin jap has not been provided and \$17,5000." The verifier confirmed the project is not new any Natural New "a selegated by pleas 100 selection which may require additional baffering (100 year) when who jear joint (100 year) (100 year) when who jear joint (100 year) (100 year) (100 year) when who jear joint (100 year) (100 year) (10	Tills "(pairietholflerWidth), jef has been provided as of 1/13/2022 The stream dissant had no width, the whole Signer blams a width of 20 Till 10 fuller/sizes). The MOZ buffer are of 20 Till 10 fuller/sizes). The MOZ buffer are for 20 Till 10 fuller/sizes). The MOZ buffer are for 10 fuller sizes are sizes of 10 fuller sizes. The MOZ buffer are for sizes, 5 and 6 full the MOZ buffer sizes are of the sizes in the 20 Till 10 fuller.	buffers on either side, and the restricted acres have been incorporated into the baseline. This item may	Coo	losed
CR 26	in "PCISAL KE16, 2019, (MPPicinic, 20110930" on the RP1 MPV Vide With shift the Cords amount is corrected by multiplining the 2019 outlined by the 2011 weighted bank correction value, but two steps later the Bothwood products convenient to Try List imstriplined by aspecific gravity weighted to the relative harveold of the 2019 data, MPV just The Made Correction of the 2019 data on the 2019 data?	feet Trout witness FZE_96_20223111.kin new treats early year of PSI separately, and ship broaks cut the ten and code values by species proup to match species specify grades. The FCE46_4026_2021_100PAIRE_202202311.kin & FCE46_4026_2029_100PAIRE_20220111.kin how the species demonstrate CCZT cets.	The Back WT 'S value applied for the 2019 Mongoose Harvest HM Min Tons (and D or Speciestismum) of Trick unburse PT_166_20201113 using comparable harvest from the St. Just this should be updated to meet the expanded harvest from the St. Just this should be updated to meet the expanded RPs as specified in this it, resignors.	This has been changed in file Trust volumes P22_56_2022031. elss	Thank you for making this change, further changes have been made and confirmed through small communication. This item may be closed.			Cor	losed
CR 27	Why doesn't the tree list from YEASE_READ_Projects, Plotkeys_20120307 deal value must the corresponding value on the second to the second to the second to the Tab C1.2.7 Would be more appropriet to use the restrict calculated value for reporting periods for both like and dead quantification of the Project values?	File PCI64_XE14_(RTI_,Field_2022012.Alle has been updated so the stocks match the Plot everage file.	Thursk you for making the change to the initial stocks in the ERT calculation workhook. Please update the IPT stocks as well.	IPS stacks have been updated in file PCMA_PERA_PERA_FIRE_FIRE_30220213. Note that all clocks have been changed to assume no change until wortfall by a recorded.	Thusk you for making this correction. This item may be closed.			Cor	losed
CR 28	What is the purpose of projecting harvest removals from oracias tocks in the ET calculation workbook in row 19 withbook tecking the projected HWN9 in row 21, and then excluding the HWN9 past 2024?	Nervest CO2 is no larger part of the formula. Hervest in the enake stocks will be accounted for when plots are remeasured. See the PCS64_REA4_ERTS, Final_20200112 also.	Appligate for an unclear question: we intended to ask about why there were prejected MVV emovable from Project stocks in rev. 21 of the 2010 ERT workbook only Project 2025. Since these are not consequential to the verification, piezes disregard. However, new 3 appears in the 2020112 ERT workbook, there is no longer an accounted of hardwork word being removed from the onice stocks. Please grounds an update or clarification.	Total CO2 removed from the size has been included again in annual project obtaining, and will be subdated when the plots are remeasured.	Thank you for making this correction. This item may be closed.			Cha	losed
CR 29	In Tab E5.1,2 of the PC364_KB14_ERTs_Final_20210980 document, why is the Project Live Tree value in cells 519 and X13 not reflected of the Project model like the first decide calculations?	This has been corrected in PCSS4_XE14_ERTI, Final_20220112.nlp to include below ground stocks.	Adont on appear a Daniegh his beam made cells \$33 and \$23 are the same that \$000 werels and office one controlled to the Project Model that which was could in years 2009 x 2013. If the project model results are not sould snow; years, and x 2004 (x 6135 x), what is the justification or reasoning for the formula: - M x 100 x 610 x 510 x 5	This has been corrected in PC364_E814_ERTs_Final_20220331 to reflect the LP model outputs for those time periods.	Thank you for making this correction. This item may be closed.			Cou	losed
CR 30	Since RP1 oncide stocks are adjusted for harvesting by subtracting the reported whole-tree HMPs, please carrily how this accounts for the removal/cotting or submerchantable material that is not quantified in the HMPs?	Beginner provided by email: Owned the project country is conservative given that dead stocks are held constant, and their emarch stocks the headers are removed from the standing project stocks. The additional reactions are stocked by accurate the second second of the emission relative to the emission selected or emissions desired to emissions desired to the emission desired to the emissi	The inquiry is in relation to accurate accounting of 89% onlike stocks as ufficiently by harvesting during 81%, which is not dependent on the Project consume. The scholarity risk period is not independent on the Project consume. The scholarity risk period is not support to the project consumer. The scholarity risk period is not support as the scholarity of the scholarity period is not as the scholarity of the scholarity period is not as the scholarity of the scholarity of the scholarity period is to the scholarity of the scholarity of the scholarity of the scholarity of the scholarity of the scholarity of the scholarity of t	It is unknown how many trees are entitled for slid stolls, or are billed by longer fallen trees and off it the search. Remoring the COD between from all areas of the propects all available to the propect of a stoll and of a sear can of the example of the search of the search of the search of the example pilot, and that the BP1-methor is based on existing plot also.	To clarify with respect to CR 23: were plots measured, then harvested, and confirmed that no trees were removed? Or is the response here strenging to include that got measurements as used in the project twentory are post harvest, using poor harvest preventing via a load strange poor harvest preventing via as a double- counting the removals and therefore conservative?	Per email exchange: Reparding plot harvest, we always ask the project forester to track any and all harvest and incidental killing or breaking of trose prior to the fast werification. It is my understanding that one fast the second of the second of the second fast control of the second of the second of the fast control of the second of the second of the harvest that happened prior to crusing, would have been reflected in the plot data.	Per the developer, there is no recording of submerchastable finisher being havested, either in referred or in Preject stacks. It is also unknown how the per submerchastable stacks in allow unknown how staked by larger trees during felling. Total HWW in credits account for appropria 1, 100 of a case of 360,000 certain (p8 Ps.), below 15.1 it is reasonable to assume that submerchastable imber loss likes and therefore immedient, but we excommend a more accurate method of accounting for factore harvest. This team may be deader.	Co	losed
CR 31	After review, the properly scaled and quantified End of 18°2 (\$93,002) Total low values as seen in KBD4 far out pace the 2021 Project MODEs seen in 1882 2.66,73°3.1 vensus 2,275,4653 or a afference of 93,968 tons. The grown forward values were field verified during the size visit and these stocks determine RP1 credits. Please justify why the LP Project Model is so far apart from values that are field verified.	Augmont a product by entail and photon. A LP Physic product being the plant grown forward from the cruise data is due to 3.5 years and PSP, enclosed-mortality. I have the BPT or dues in the BT stable, and have the BPT asked alreads and PSP and value, and PSP and values. The beside and the plant plant is and PSP clast values, and PSP and values have alreaded that in DSP, the PSP mortality that we know did not occur (hough there is still some loss of stacking byt the PSP mortality won'th the grown). Last is that still stock harvest out of the BPS like value, as this leaps it below the BPS value.	The reductions by P/S for mortality and subsequent loss of growth would appear to account for a large portion of the difference. The Project model still seem significantly different than the value for RPI onsite stocks. Are these other reasons for this discrepancy?	The other part of the discrepancy is that the RP1 stocks are projected from cruise date to RP1 and date using the Winger daily growth estimate, which is about 55%. ACR, in the RP1 form, requires using the proportion of days in the RP (37%), instead of bringings derived values.	Please provide context/references to the Winget daily growth estimate, the verifier was unable to find datasis related to this. Does the 12 growth model use some other form of modeling that is not PVS7 Or is there a difference in 12 end date and the grown forward treelist end date?	Per email exchange: The Winget paper has been provided.	Thank you for this clarification and the documentation. Between the PS mortality, the lack of growth due to that mortality, the waration in grown flower that mortality, the waration in grown floward values using Winget versus the 5 years increment model of PS, there appears to be enough justification for the difference between grown floward values and Project MODEL values. This item may be closted.	Clo	losed