



VALIDATION/VERIFICATION REPORT

ACR VALIDATION/VERIFICATION OF ANEW - RAINIER GATEWAY FORESTRY
PROJECT (ACR576)

REPORTING PERIOD 1

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Table of Contents

| | |
|--|-----------|
| Summary..... | 2 |
| Abbreviations..... | 4 |
| 1 Introduction | 5 |
| 1.1 Project Participants | 5 |
| 1.2 Description of Project | 5 |
| 1.3 Validation/Verification Objectives | 6 |
| 1.4 Validation/Verification Scope and Criteria | 7 |
| 1.5 Materiality & Level of Assurance | 8 |
| 1.6 Audit Team | 8 |
| 2 Audit Process and Methodology..... | 8 |
| 2.1 Desk Review..... | 8 |
| 2.2 Site Visit..... | 9 |
| 2.3 Quantitative Review (only required for verification) | 10 |
| 2.4 Interviews | 11 |
| 2.5 Findings | 12 |
| 2.6 Audit Schedule | 12 |
| 2.7 Validation Activities..... | 12 |
| 2.8 Eligibility Requirements | 13 |
| 2.9 Additionality | 14 |
| 2.10 Permanence and Risk Mitigation | 16 |
| 2.11 Baseline | 16 |
| 2.12 Leakage | 17 |
| 2.13 Monitoring Requirements..... | 18 |
| 2.14 Community and Environmental Impacts | 19 |
| 2.15 Stakeholder Comments | 20 |
| 2.16 Validation Conclusion | 21 |
| 3 Verification Activities..... | 21 |
| 3.1 Project Implementation Status..... | 21 |
| 3.2 Data-Checks & Materiality | 22 |
| 3.3 Verification Conclusion | 24 |
| Appendix A: Reference List | 25 |
| Project Documents..... | 25 |
| Verifier Documents | 26 |
| Appendix B: Findings List | 27 |
| Appendix C: Project Team..... | 77 |
| Appendix D: Document Tracking | 81 |

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|-------------------------|---|
| Project Name | Anew - Rainier Gateway Forestry Project |
| Project ID | ACR576 |
| Reporting Period | 7/7/2020 – 7/6/2021 |
| Client | Anew Climate |
| Date of Issue | 3/31/2023 |
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Summary

The Anew - Rainier Gateway Forestry Project (Project) is located on approximately 3,326.6 acres of conifer forests of the upper Nisqually River Watershed in Pierce County, Washington. About half of the property is owned by the Nisqually Land Trust (NLT), the Project Proponent, and the other half by the Nisqually Community Forest (NCF), who manage each property independently under different management plans, but collaborate to achieve common goals. The properties promote sustainable forest management, revenue generation for the community forest, habitat development and preservation, and water quality within the greater watershed. The Nisqually River has historically been a major provider of salmon habitat for the Puget Sound, and preserving this habitat and ensuring salmon friendly waters is at the top of the list for the property's management goals. In the Nisqually Community Forest, management objectives include commercial harvesting with extending rotation lengths, commercial thinning to improve forest health, and the improvement of water quality and wildlife habitat.

The project activity is an improved forest management project, where the NLT Forest management practices are incrementally improved through the implementation of the carbon project through less intensive management than what occurs on similar conservation properties in the region. The NCF forest management practices also represent a significant improvement in the carbon storage and conservation values as compared to the higher return, more aggressive management regimes of similar landowners in the region, characterized by shorter, even-aged rotations. Management decisions of both forests focus on sustainable, natural forest growth and maintenance harvests for such values as recreation, water quality and quantity, wildlife habitat and forest health. The project ensures long-term sustainable management of the forests, which could otherwise undergo more intensive commercial timber harvesting practices.

This report presents the results of the project's validation and initial verification to the American Carbon Registry (ACR) Standards. Its purpose is to systematically assess and report the project's conformance with the ACR standard requirements corresponding to the first reporting period from 7/7/2020 – 7/6/2021. The evaluation involved document analysis, interviews with project participants and interested parties, and observations and measurements made directly in the forest, while considering a representative sample of the project activities and sites. Validation activities included forest inventory checks and interviews with project managers, contractors, and other relevant stakeholders. The context of the surrounding landscape conditions under the baseline and project scenarios was also assessed. The scope of the verification included the ACR verification of the project's initial monitoring period to determine the project's conformance with the ACR Standard (v7.0), the applied ACR IFM Methodology (v1.3), supporting ACR Program documents, and implementation of the validated GHG Plan.

The validation and verification were performed through a combination of document review, interviews and communications with relevant personnel, as well as on-site inspections and sampling. The site visit for the project was conducted from 9/28 - 9/29/2021 in Eatonville, Washington. The verification process included several official and documented exchanges between the verifier team and the project proponents to gather additional information for review and for examination of compliance with all applicable criteria. These exchanges included 3 rounds of an Issues Log produced by S&A to which the project proponents were required to respond, and for which 20 Clarification Requests, 11 New Information Requests and 10 Non-Conformances were identified. Verifiers confirmed in an email to the project proponents dated 3/8/2023 that all remaining issues were satisfied in the responses provided in the Issues Log.

Once all identified issues were adequately resolved, S&A Carbon drafted this final combined validation & verification report and deems, with a reasonable level of assurance, that the project is in conformance with all of the requirements in the ACR Standards, without qualifications or limitations. The project has been implemented in accordance with the validated GHG Plan over the initial monitoring period with no deviations from the described project activities in the GHG Plan or from the applied ACR methodology.

S&A Carbon is thus able to issue a positive validation opinion of the project's design as outlined in the GHG Plan dated 3/30/2023 and the projected *ex-ante* GHG emission reductions of 303,851 tCO₂e over the first 20-year crediting period. S&A Carbon is also able to issue a positive verification opinion for the 38,312 tCO₂e of verified emissions reductions, as reported in the Monitoring Report (file titled with 3/21/2023 date and signed by the project proponent on 3/22/2023). The verification assessment covered the monitoring period from 7/7/2020 – 7/6/2021 and verified that calculated emission reductions were achieved during the monitoring period with a reasonable level of assurance. The overall risk rating was 17.1%. Therefore, the total number of credits to be deposited in the buffer account for the initial monitoring period is 6,557 tCO₂e and the total net ERTs to be issued are 31,755 tCO₂e.

Abbreviations

| | |
|-------------------|--|
| ACR | American Carbon Registry |
| ANAB | ANSI National Accreditation Board |
| BMP | Best Management Practices |
| CO ₂ e | Carbon Dioxide Equivalent |
| CP | Common Practice |
| EPA | Environmental Protection Agency |
| ERTs | Emission Reduction Tons |
| GHG | Greenhouse Gas |
| HWP | Harvested Wood Products |
| ICS | Initial Carbon Stocks |
| NRCS | USDA Natural Resource Conservation Service |
| PD | Project Developer |
| PDD | Project Design Document |
| PP | Project Participants |
| RPF | Registered Professional Forester |
| S&A | S&A Carbon |
| t | Metric Tonnes |
| TC | Technical Consultant |
| U.S.A | United States of America |
| USDA | United States Department of Agriculture |
| VVB | Validation and Verification Body |

1 Introduction

S&A Carbon (S&A) has been asked by Anew Climate (Anew) to verify the emission reductions generated by the Anew - Rainier Gateway Forestry Project. The validation/verification process is required by the American Carbon Registry's Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands (ACR IFM Methodology, v1.3). S&A validation/verification activities began on 9/22/2021. This report presents the findings from the validation/verification of the project's greenhouse gas (GHG) emission reductions/enhancements.

The Offset Project Registry (OPR) for this project is the American Carbon Registry (ACR), listed as ACR576.

1.1 Project Participants

| Role | Organization Name | Main Contact Information and Person |
|--|----------------------------|--|
| Project Proponent (PP) & Landowner | Nisqually Land Trust | Joe Kane, Executive Director 1420 Marvin Road NE, Suite C, PMB 243 Olympia, WA 98516 kane@nisquallylandtrust.org |
| Landowner (Community Forest portion of the property) | Nisqually Community Forest | Justin All, Vice President 620 Old Pacific Highway SE, Olympia, WA 98513 Justin@nisquallycommunityforest.org |
| Offset Project Developer & Technical Consultant | Anew Climate | Liz Lott, Vice President, Natural Climate Solutions 2825 E. Cottonwood Pkwy, Suite 400 Cottonwood Heights, UT 84121 415-434-4165 llott@anewclimate.com |
| Contractor – Forest Inventory | Resilient Forestry | Sean Jeronimo 3703 S Edmunds St, Seattle, WA 98118 206-730-6154 sean@resilientforestry.com |

Entities listed in the table above are collectively referred to as project participants throughout this document.

1.2 Description of Project

The Anew - Rainier Gateway Forestry Project (Project) is located on approximately 3,326.6 acres of conifer forests of the upper Nisqually River Watershed in Pierce County, Washington. About half of the property is owned by the Nisqually Land Trust (NLT), the Project Proponent, and the other half by the Nisqually Community Forest (NCF), who manage each property independently under different management plans, but collaborate to achieve common goals. The properties promote sustainable forest management, revenue generation for the community forest, habitat development and preservation, and water quality within the greater watershed. The Nisqually River has historically been a major provider of salmon habitat for the Puget Sound, and preserving this habitat and ensuring salmon friendly waters is at the top of the list for the property's management goals. In the Nisqually Community Forest, management objectives include commercial harvesting with extending rotation

lengths, commercial thinning to improve forest health, and the improvement of water quality and wildlife habitat.

The project activity is an improved forest management project. Both the Nisqually Land Trust, and Nisqually Community Forest management goals address climate change mitigation through the generation of more resilient, diverse, and healthy forests. Carbon revenues are aimed to help offset the costs of non-revenue generating ecological treatments to help meet these goals, which may not otherwise occur. Management considerations for the project area will increase rotation lengths, improve forest health, and restore water quality and wildlife habitat.

NLT Forest management practices are incrementally improved through the implementation of the carbon project through less intensive management than what occurs on similar conservation properties in the region. These practices include planting of understory and overstory native species, ecological thinning for species diversity and improved forest structure, road decommissioning, focusing harvesting on ecosystem function and adaptability rather than revenue generation, and generating late-successional old growth forest characteristics. The NCF forest management practices also represent a significant improvement in the carbon storage and conservation values as compared to the higher return, more aggressive management regimes of similar landowners in the region, characterized by shorter, even-aged rotations. The project ensures long-term sustainable management of the forests, which could otherwise undergo more intensive commercial timber harvesting practices. The common forest management practices as well as the project and baseline scenarios are more fully described in the GHG Plan (Sections A6.2, A6.3 and C2).

| Date Description | Date |
|------------------------------------|---------------------|
| Project Start Date | 7/7/2020 |
| Crediting Period | 7/7/2020 - 7/6/2040 |
| Reporting Period 1 | 7/7/2020 - 7/6/2021 |
| Validation/Verification Start Date | 9/22/2021 |

1.3 Validation/Verification Objectives

This is the project's ACR validation and initial verification. This will be a full validation/verification, including a site visit to assess the Project's conformance with the ACR criteria outlined below, corresponding to the first reporting period from 7/7/2020 – 7/6/2021.

The objectives of validation are to evaluate:

- Conformance to the ACR Standard;
- 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 emission reductions/removal enhancements, leakage assessment, and impermanence risk assessment and mitigation (if applicable).

The objectives of verification are to evaluate the following:

- Reported GHG baseline, project emissions and emission reductions/removal enhancements, leakage assessment, and impermanence risk assessment and mitigation (if applicable);
- Any significant changes to the project procedures or criteria since the last verification (N/A); and
- Any significant changes in the GHG project's baseline emissions and emission reductions/removal enhancements since the last verification (N/A).

Further, S&A will review the GHG Project Plan, GHG Assertion and any additional relevant documentation to determine:

- That the reported emissions reductions and/or removal enhancements are real;
- Degree of confidence in and completeness of the GHG assertion;
- That project implementation is consistent with the GHG Project Plan;
- Eligibility for registration on ACR; and
- Sources and magnitude of potential errors, omissions, and misrepresentations, including:
 - Inherent risk of material misstatement; and
 - Risk that the existing controls of the GHG project will not prevent or detect a material misstatement.

1.4 Validation/Verification Scope and Criteria

Validation shall include examination of all the following elements of a GHG Project Plan:

- Project boundary and procedures for establishing the project boundary;
- Physical infrastructure, activities, technologies, and processes of the project;
- GHGs, sources, and sinks within the project boundary;
- Temporal boundary;
- Description of and justification for the baseline scenario;
- Methodologies, algorithms, and calculations that will be used to generate estimates of emissions and emission reductions/removal enhancements;
- Process information, source identification/counts, and operational details;
- Data management systems;
- QA/QC procedures;
- Processes for uncertainty assessments; and
- Project-specific conformance to ACR eligibility criteria

Verification shall include examination of some or all of the following elements of a GHG Project Plan:

- Physical infrastructure, activities, technologies, and processes of the GHG project;
- GHG SSRs within the project boundary;
- Temporal boundary;
- Baseline scenarios;
- Methods and calculations used to generate estimates of emissions and emission reductions/removal enhancements;
- Original underlying data and documentation as relevant and required to evaluate the GHG assertion;
- Process information, source identification/counts, and operational details;
- Data management systems;
- Roles and responsibilities of project participants or project proponent staff;

- QA/QC procedures and results;
- Processes for and results from uncertainty assessments; and
- Project-specific conformance to ACR eligibility criteria

The criteria for the offset validation/verification services are:

- The American Carbon Registry Standard, v7.0, December 2020
- The ACR Validation and Verification Standard, v1.1, May 2018
- The Improved Forest Management (IFM) Methodology for Non-Federal U.S. Forestlands, v1.3, April 2018
- Errata and Clarifications for ACR IFM Methodology v1.3, April 2022
- ACR Tool for Risk Analysis and Buffer Determination v1.0
- ISO Standards 14064-2 and 14064-3, 2006

1.5 Materiality & Level of Assurance

The validation/verification team must state with reasonable assurance that discrepancies between emissions reductions/removal enhancements claimed by the Project Proponent and estimated by the VVB be immaterial (less than the materiality threshold of +/- 5%). The equation below is used to calculate the percent error in an emission reduction assertion.

$$\% \text{ Error} = \frac{\text{Project Emission Reduction Assertion} - \text{Verifier Emission Reduction Recalculation}}{\text{Verifier Emission Reduction Recalculation}} \times 100$$

1.6 Audit Team

| Role | Name |
|--------------------------------------|--|
| Lead Validator/Verifier | Robert Turner |
| Technical Reviewer | Pablo Reed |
| Validator under observation | Bill Stack |
| Validator/Verifier under observation | Eduardo Paixão |
| Technical Expert | Marty Duffany |
| Biometrician | Elizabeth McGarrigle |
| Site Visit Team | Lawson Henderson, Alex Powell, Thomas Blair, Beth Daut |
| Project Manager/ Internal Approver | Alexa Kandarlis |

*Previous Lead Validator/Verifier was Lawson Henderson, which changed on 12/9/2022.

2 Audit Process and Methodology

S&As audit included the following activities:

2.1 Desk Review

A kickoff conference call was held on 9/22/2021. The project team and verifiers discussed initial findings from a desk review of submitted documents, targeting aspects of the project and supporting information that might affect the evaluation. Meeting minutes were prepared following the kickoff meeting.

The draft GHG Plan was provided on 9/22/2021. The verifiers reviewed the document and assessed the eligibility criteria required to design, measure, and monitor the project to the requirements of the ACR Standards and IFM Methodology. Verifiers confirmed that the ACR eligibility requirements were met. The Verification Plan was completed and sent to the PP on 9/24/2021.

A draft Sampling Plan was prepared based on information provided from the PP. The Sampling Plan evaluates the credibility and rigor of the verification methodology items. A risk evaluation was conducted assessing the Inventory Methodology Verification Items of the ACR Standard. The Sampling Plan outlined a sampling scheme, based on the risk assessment and document reviews, to evaluate the Project's monitoring systems' compliance with the ACR Standard. The final Sampling Plan summarizes the results of the sampling and the data checks performed on the sampled data.

The Sampling Plan will be retained by S&A for a period of not less than 15 years following the submission of the Project Verification Statement. All material received, reviewed, and generated by the provision of Offset Verification Services will be retained by S&A for the same period.

2.2 Site Visit

A site visit was conducted by Lawson Henderson, Thomas Blair, Beth Daut & Alex Powell from 9/28/2021 through 9/29/2021. An opening meeting was conducted on 9/28/2021. Attendees of the site visit are as follows:

| Attendees | Company | Role | Attend Opening Meeting | Attend Field Sampling | Attend Closing Meeting |
|--------------------------|-----------------------------------|---------------------------------|------------------------|-----------------------|------------------------|
| Lawson Henderson* | S&A Carbon | Lead Auditor | X | X | X |
| Ian Hash & Aaron Wykhuis | Anew Climate | Project Developer | X | X | X |
| Miles LeFevre | Resilient Forestry | Forest Inventory Contractor | X | X | X |
| Thomas Blair | S&A Carbon | Contractor, S&A Site Visit Team | X | X | X |
| Beth Daut | S&A Carbon | Contractor, S&A Site Visit Team | X | X | X |
| Alex Powell | S&A Carbon | Contractor, S&A Site Visit Team | X | X | X |
| Matt Hurteau | ANSI National Accreditation Board | ANSI Witness assessment | X | X | X |
| Bryon Foster | ANSI National Accreditation Board | ANSI Witness assessment | X | X | X |

* Lead Validator/Verifier was Lawson Henderson during the site visit. As noted previously, Robert Turner became the lead validator/verifier on 12/9/2022.

During the opening meeting, the objectives of the site visit and overall validation/verification process were presented by the verification team including an overview of the statistical t-test required for verification of the forest inventory; the qualifications of the PP were confirmed; inventory procedures and QA/QC were discussed and clarified; and site visit logistics, personnel and vehicles/transport, and schedules were discussed and planned.

During the site visit, verification team activities included the measurement of 11 randomly selected forest inventory plots across the project area. Following plot data collection, the verifiers ran their verification data through the t-test. The analysis showed that the project's inventory was verifiable at a confidence interval of 90%. Site visit activities also included collecting GPS data (plot center, project boundaries); observing and documenting the forested conditions within the project area (e.g., species composition, age class, canopy cover); and discussions with the PP on QA/QC processes around the inventory data collection, baseline model inputs, and regional common practice for forest management of the forest types within the project area.

A closing meeting for the site visit was held on 9/29/2021. Attendees are described in the table above. Other topics also discussed included preparation of the Issue Log, scheduling of the baseline model review call, and proposed validation/verification schedule; and reflections and learnings from the site visit.

2.3 Quantitative Review (only required for verification)

The data and information supporting the PP's GHG assertion for this Project is based on historical records (forest inventory data from the first Reporting Period) and future projections (modeled tree growth). To verify this assertion S&A conducted various quantitative analyses of the project and baseline carbon stocks, covering the relevant carbon pools quantified by the PP, and the inputs used in the calculation of the projected *ex-ante* emission reductions over the first 20-year crediting period as well as the actual *ex-post* emission reductions for this initial reporting period (7/7/2020 – 7/6/2021). The audit team implemented a detailed review of all aspects of the carbon stock modeling, including the stratification process, forest inventory design and specifications, measurement techniques used by the PP's inventory crew, review of the species in the inventory and the correct assignment of volume and biomass equations, and checks to confirm that modeled growth used to project carbon stocks forward have been calculated and applied correctly. The modeling methods were assessed to ensure an approved model was used, that it was appropriately calibrated for the region, and inventory data flow through the modeling system was reviewed.

The reported *ex-post* emission reductions were confirmed by tracking all components of the PP's emission reduction calculation workbooks. This included checks that the entries for initial carbon stocks, confidence deduction, baseline stocks, baseline and harvested wood products, and the reversal risk determinations, leakage and uncertainty are all entered and calculated correctly from their computed sources, as well as confirming the accuracy of their sources. The entire inventory treelist was independently recalculated by the verifiers to estimate the project stocks and the results were compared to the PP's reported carbon stocks. Uncertainty and associated deductions were also independently calculated by the verifier. The verifier's methods are considered a complete check of the inventory data on a plot-by-plot level, using the PP's raw data and verification of all the PP's calculations for accuracy and completeness.

For projects where plot sampling is required during a verification, ACR provided guidance stating VVBs shall resample a minimum of 5% of the project's plots. For sampling to pass verification, all strata need to be represented in the sample selection and statistical agreement must be attained between the verifier's and project's plot carbon values using a t-test at 90% confidence interval. This minimum sampling intensity was considered in the selection of sample plots to be measured by the verifiers along with allocation of sample plots among individual project strata based on risk.

All trees within the selected sample plots were re-measured by the verifiers including tree diameters (DBH) & limiting distances (i.e., trees in/out of the plot), species identifications, missing volume, and tree status assessments (live/dead) were independently measured using tools identical or comparable to those used by the PP. No tree height measurements were sampled during the site visit as this field parameter was not needed in calculating project stocks as specified in the IFM Methodology. Verifiers did, however, take at least one tree height measurement on selected the sample plots to check inputs used in baseline modeling.

Inventory re-measurement was confirmed to meet the ACR recommendations and all measurement methods were confirmed to be consistent with the PP's inventory specification. Carbon per plot and across the project area was calculated from the sampled plots and compared to the PP's inventory for the same plots. The verifier calculations and the PP's calculations were entered into a t-test worksheet, using the paired plot method (two-tailed t-test, at the 90% confidence interval), and confirmed to meet the statistical standards expected by ACR for projects that require independent re-measurement for verification.

2.4 Interviews

The following is a list of the people interviewed as part of the validation/verification. The interviewees included those people directly, and in some cases indirectly, involved and/or affected by the project activities. The training and qualifications of the PP team was confirmed by referencing bios for the team on the PP website on 9/22/2021 (<http://www.bluesource.com/about-us/the-team/> and <https://www.resilientforestry.com/about/people>). The verification team also confirmed these qualifications during interviews with PP staff throughout the validation/verification site visit.

| Date | Name | Title/Organization |
|---------------------------|---|--|
| Throughout Verification | Ian Hash | Director of Natural Climate Solutions - Forest Carbon; Anew Climate |
| 9/22/2021; 9/28-9/29/2021 | Aaron Wykhuis | Manager, Natural Climate Solutions; Anew Climate |
| 9/22/2021 | Karuna Paudel | Forest Carbon Manager; Anew Climate |
| 4/8/2022 | Jeanette Dörner, Jason Hall, and Joe Kane | Executive Director of the Nisqually Land Trust, Executive Director of the Nisqually River Foundation, Consultant for Nisqually Land Trust Consultant (former Executive Director of the Nisqually Land Trust & former Board member), respectively |
| 4/13/2022 | Josh Clark | Director, Forest Carbon Modeling – Anew Climate |
| 8/11-8/13/2022 | Jaal Mann | Lead Forester; Northwest Natural Resource Group |
| 9/13/2022 | Liz Lott | Vice President; Anew Climate |

2.5 Findings

Throughout the validation/verification, findings were recorded by the audit team as per guidance outlined in the criteria and supporting documents cited above. Any discrepancies identified by the validation/verification team were documented in the Issues Log. The validation/verification team has also documented in the Issues Log the source of any difference identified, including whether the difference results in a correctable error. The Issues Log was submitted to the client. Prior to completion of the validation/verification, all identified non-conformances were required to be addressed, and correctable errors were required to be fixed. The client submitted additional evidence for S&A's evaluation for conformance. The client corrected all correctable issues.

2.6 Audit Schedule

The following table summarizes the key audit milestones:

| Validation/Verification Activity | Proposed Date | Actual Date |
|--|-----------------------|---------------------|
| Kick-off meeting | 9/20/2021 | 9/22/2021 |
| Site visit | 9/28/2021 – 9/30/2021 | 9/28-9/29/2021 |
| S&A Carbon submits Issues Log (1 st round) | 10/30/2021 | 4/18/2022 |
| Anew response to issues | 11/12/2021 | 5/26/2022 (partial) |
| S&A Carbon submits Issues Log (2 nd round) | 11/24/2021 | 8/19/2022 |
| Anew response to issues | 12/12/2021 | 10/7/2022 |
| S&A Carbon submits Issues Log (3 rd round) | --- | 11/14/2022 |
| Anew response to issues | --- | 11/29/2022 |
| S&A Carbon closes out Issues Log | 12/28/2021 | 12/6/2022 |
| S&A Carbon submits validation/verification report & statement for Technical Review | 1/6/2022 | 12/14/2022 |
| S&A Carbon submits verification report for Anew review/approval | 1/14/2022 | 12/20/2022 |
| S&A Carbon conducts closing of validation/verification conference call with PP | ---- | 12/21/2023 |
| S&A Carbon submits final validation/verification documents to ACR | 1/20/2022 | 12/22/2022 |
| S&A Carbon re-opens Issues Log based on ACR review comments | --- | 2/28/2023 |
| Anew response to issues | --- | 2/28/2023 |
| S&A Carbon closes out Issues Log | ---- | 3/8/2023 |
| S&A Carbon submits validation/verification report for Technical Review | -- | 3/10/2023 |
| S&A Carbon submits verification report for Anew review/approval | -- | 3/14/2023 |
| S&A Carbon re-submits final validation/verification documents to ACR | 1/20/2022 | 3/31/2023 |

2.7 Validation Activities

The validation and concurrent verification were performed through a combination of document reviews, interviews and communications with relevant personnel, as well as on-site inspections. As

noted, the site visit to the project was conducted from 9/28/2021 through 9/29/2021 in Eatonville, Washington. The validation/verification process included several official and documented exchanges between the VVB and the PP to gather additional information for review and for examination of compliance with all applicable criteria. These exchanges included 3 rounds of an Issues Log produced by S&A to which the project proponents were required to respond, and for which 18 Clarification Requests, 11 New Information Requests, 10 Non-Conformances and 1 Observation were identified. Verifiers initially confirmed in an email to the project proponents on 12/6/2023 that all remaining issues were satisfied in the responses provided in the Issues Log.

On 2/15/2023, ACR provided project review comments. These comments resulted in the PP revising the project area and re-running the baseline model, which affected the ERT calculations. Upon the verifiers review of the revised project documents, two clarification issues were identified and the Issues Log was reopened (2/28/2023). The PP addressed the outstanding issues, which provided the needed clarifications. Verifiers confirmed in an e-mail to the project proponents that the Issues Log was closed.

2.8 Eligibility Requirements

The verifiers assessed the project against the eligibility criteria of the ACR Standard as well as the applicability conditions applied in the ACR IFM methodology by the project and determined the project to be eligible, and applicable to the ACR methodology. The project applied an ACR approved methodology, Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands, v1.3. The project was found to meet the eligibility requirements of the ACR Standards in terms of its Start Date, Minimum Project Term, Crediting Period length, Land Eligibility & Title/Ownership, Adherence to Natural Forest Management Requirements and the Permanence of the generated GHG emission reductions. It was also found to meet the applicability conditions of this methodology in terms of land ownership type, legality of harvesting activities, types of project activities and natural forest management criteria.

The reporting period length for RP1 (7/7/2020-7/6/2021) is less than two years and meets the eligibility requirement. The project start date is after 11/1/1997 and is therefore considered an eligible project. The project start date of 7/7/2020 coincides with the signing of the Carbon Marketing & Development Agreement between Nisqually Land Trust and Anew Climate (formerly Bluesource) and Nisqually Community Forest and Anew Climate, both were recorded on this date. The start date is also the same date as the beginning of the first crediting period. The project is expected to achieve validation against the ACR standards within 3 years of the project start date. The minimum project term stated in the GHG Plan is 40 years as required by the methodology. The Crediting period is 20 years, consistent with the applied methodology.

The project is an IFM project type with greater than 10% forestland over this initial reporting period. The project activities include commercial harvesting. The verifiers are reasonably assured that the project area is located on non-federally owned lands within Washington.

The project area's forest is composed of 100% native species. Tree species include primarily pacific silver fir, noble fir, western hemlock and mountain hemlock. The western hemlock zone occurs along the valley floor up to 2,000 feet of elevation and is dominated by western hemlock and Douglas-fir.

The understory of this forest region is composed of big-leaf maple and other deciduous trees growing in forest openings such as red alder. The pacific silver fir forest zone occurs between 2,000 and 4,000 feet, is dominated by pacific silver fir and western hemlock, with noble fir and Douglas-fir interspersed. At high elevations, between 4,000 and 6,000 feet, mountain hemlock dominates the forest composition. The project activity doesn't involve any use of non-native species.

In accordance with the ACR IFM Methodology, the PP's risk assessment for Reporting Period 1 uses the ACR Tool for Risk Analysis and Buffer Determination v1.0, which was determined to have a risk rating of 17.1%. Verifiers completed a review of the percent contributions for each risk category and found the individual risk ratings reasonable, appropriate, accurate and well supported with documentation to justify the associated risks. In total, 17.1% of the gross emission reductions will be deposited into the ACR buffer account. This deduction is made to the gross ERT calculations produced by the PP's to determine the total tradeable balance of ERTs generated by the project during this initial reporting period.

| Risk Type | Conform | Finding | GHG Plan | VVB -check |
|-------------------------------------|----------|----------------------|---------------|---------------|
| Financial | Y | Default | 4% | 4% |
| Project Management | Y | Default | 4% | 4% |
| Social/Policy | Y | Default | 2% | 2% |
| Conservation Easement Deduction* | Y | Default | -0.89% | -0.89% |
| Fire | Y | Low Fire Risk Region | 2% | 2% |
| Diseases and Pests | Y | Default | 4% | 4% |
| Levee Failure & Water Table Changes | Y | Default | 0% | 0% |
| Other Natural Disaster Events | Y | Default | 2% | 2% |
| Total Risk | Y | | 17.11% | 17.11% |

*A proportion of the project area contains a conservation easement (44.3%). The conservation easement deduction was proportioned based the area containing this easement.

2.9 Additionality

To demonstrate the GHG emission reductions from the project are additional and considered to be above and beyond the "business as usual" scenario, it must pass the ACR three-prong additionality test to prove that it (1) currently exceeds current effective and enforced laws and regulations; (2) exceeds common practice in the relevant industry sector and geographic region; and (3) faces at least one of the three implementation barriers (financial, technological, or institutional). The project was found to be additional with the project activities above and beyond the business-as-usual scenario for privately owned commercially managed forest lands in western Washington.

The laws and regulations outlined in Section C1 of the GHG plan were found to comprehensively identify the applicable laws and regulations that could affect the project. The verifiers' assessment of these laws determined that none of them impact the project activities, and require the PP to implement the project activities, thereby demonstrating regulatory surplus.

The description of applicable laws and regulations in the GHG Plan was found to consider all of applicable laws and regulations in both the project and baseline activities. Applicable legal constraints

were found to be adequately incorporated into the modeled baseline harvest scenario, and the verifiers are reasonably assured all applicable laws and regulations have been considered in addressing the Regulatory Surplus Test. Applicable National, State and local laws assessed by the verifiers included the Federal Clean Water Act, the Federal Endangered Species Act, the Loggers Guide to the New OSHA Logging Safety Standards, Salmon Recovery Act, and the Washington State Forest Practices Rules. Verifiers also confirmed any legally binding elements of the conservation easement were also included in the baseline constraints (all were addressed under the WA Forest Practice Rules). Lastly, while Binding International Agreements are described in the GHG Plan, none are considered to impact the baseline scenario or the project activities.

Common practice in the region for similar types of landowners and forest types was based on inputs from the project landowners and consulting foresters who have developed, reviewed, and implemented Timber Harvest Plans within this region (Northwest Natural Resource Group, Seattle, WA). As described in Section C.2, common practice of the forest type within the project area is intensively managed via even-aged practices of thinning and clearcutting to generate income and meet conservation goals for the landowner. Verifiers confirmed this practice through discussions with the PP, landowner and regional consulting foresters; through the verification team's professional work experiences in the region; internet searches pertaining to common silvicultural practices in western Washington; and site visit observations (please see Issues Log items: #15, #28 and #32 for further discussions). The verifiers are reasonably assured that the project and its associated project activities, exceed common practice in this region of western Washington.

Section B.5 and E.1 of the GHG Plan offers a reasonable definition of the baseline harvest scenario, which the PP asserts is the common practice harvesting regime in the region for similar types of landowners and forest types. As the PP states, the baseline harvest scenario *"represents a combination of intensive conservation management, intensively managed non-profit forest ownerships, and semi-industrial harvest regimes designed to maximize the annual cashflows from a 100-year Net Present Value at a 4.74% discount rate ..."*. Specific baseline silvicultural harvest prescriptions are provided in Table 1 within Section E.1 of the GHG Plan.

The PP has elected to demonstrate there are financial barriers to implementation of the project activities and adherence to the ACR Implementation Barrier Test for additionality. Specifically, the PP asserts the landowners face limited access to financial capital, in the absence of carbon project income, that would prevent them from implementing the project activities. The PP states in the GHG Plan (C.3) carbon project income is expected to incentivize the project's implementation due to the lost revenue associated with the potential timber harvesting that could legally and feasibly occur on within the project area. The need to raise working capital to implement the project as well as to fulfill the mission of the organizations was also stated by the landowners during interviews with the verifiers.

The PP provided a Net Present Value (NPV) financial analysis for both the baseline and with project scenarios that accounts for all costs and revenues from these scenarios. In this analysis, the PP used a 4.74% discount rate, which was based a combination of non-governmental organizations, private non-industrial, and private industrial ownerships classes. Verifiers found this to be a reasonable approach at estimating the discount rate given the various ownership and management classes within the project area.

The NPV analysis results showed the project scenario's NPV is significantly lower than that of the baseline scenario demonstrating the financial barrier carbon funding overcomes in project implementation. Supporting justification for all cost and revenue assumptions applied in the financial analysis were provided and found to be reasonable by the verifiers. Based on this NPV analysis and stakeholder interviews, verifiers are reasonably assured the project has met the financial barrier test.

2.10 Permanence and Risk Mitigation

The project's GHG Plan outlines a risk assessment conducted in accordance with the ACR Tool for Risk Analysis and Buffer Determination. Percent contributions for each risk category have been applied based on guidance in the tool. All the default risk values have been applied consistent with the Tool's method. The exception is the Conservation Easement Deduction. As mentioned previously, a proportion of the project area is within a conservation easement (44.3%); the PP used this proportion to estimate the deduction (-0.886). Supporting justification that the project is in a low fire risk region was provided through the Wildfire Hazard Potential (WHP) map provided by the USFS. Verifiers also confirmed the PP's assertion that the project is not located in a region with the presence of an epidemic disease or infestation. In total, 17.11% of the gross emission reductions will be deposited into the ACR pooled buffer account. This deduction is made to the calculated gross ERT calculations generated by the project to determine the total tradeable balance of ERTs generated by the project over the initial reporting period.

Section 5.B of the ACR Standard requires that "Project Proponents of AFOLU projects with risk of reversal shall enter into a legally binding Reversal Risk Mitigation Agreement with ACR/Winrock that allows them to select a reversal risk mitigation mechanism and details the requirements for reporting and compensating reversals." This Risk Mitigation Agreement must be executed upon completion of the final GHG Plan, which the verifiers understand to be the point in time when ACR approves the final GHG plan and is ready to register the validated project. Therefore, the verifiers determined that checking this executed agreement between the PP and ACR doesn't explicitly need to take place before their final submission to ACR, but that the verifiers will need to confirm it has been executed once ACR has reviewed & approved the project just prior to registration.

2.11 Baseline

The verifiers confirm the baseline scenario represents a combination of intensive conservation management, intensively managed non-profit forest ownerships, and semi-industrial harvest regimes designed to maximize the annual cashflows from a 100-year NPV at a 4.74% discount rate in the project region of western Washington. As mentioned previously in section 2.9, the PP asserts that this scenario reflects the common silvicultural practices in the region for the project's area forest types and various ownership classes. Verifiers confirmed this practice through discussions with the PP, landowners and regional consulting foresters; through the verification team's professional work experiences in the region; internet searches pertaining to common silvicultural practices in western Washington; and site visit observations (please see Issues Log items: #15, #28 and #32 for further discussions).

The baseline (and project) on-site carbon stocks found on the project area were determined through a forest inventory implemented on the project area between November 2020 - July 2021. The inventory design employed a sample of 204 nested fixed-radius plots installed on a systematic grid across the project area. The project area was assigned to four sampling strata which were delineated

based on landownership/management (MGA & MGB) and baseline constraints associated with stream management zones (ISM & CSM – inner & outer zones), which is more fully described in the PP’s inventory document (i.e., *Carbon Plot Methodology*). The verifiers found the project’s stratification methods to be reasonable and the inventory methodology to follow standard industry practices.

Growth and yield projections were based on the US Forest Service Forest Vegetation Simulator (FVS), West Cascades variant. FVS is identified as an appropriate model in the ACR IFM methodology applied by the project. FVS was calibrated to the conditions of the project area and surrounding region. Site Index was calculated from tree cores taken in the forest and then processed by Rocky Mountain Tree Ring Research. Verifier found the site index values used for the species within the project area to be reasonable and appropriate in projecting tree growth.

The area (acres) to be cut in each prescription applied in the baseline model was determined using a linear programming model (IpSolve package), which found the combination of the three harvest prescriptions that maximizes NPV over a 100-year period. The specific baseline harvest treatments were derived by applying the common practice silvicultural prescriptions that are currently being implemented on the forest types and private land ownerships as outlined in the GHG Plan (Section E). The primary constraint incorporated into the baseline model are the riparian management zones associated with the stream classes (fish and non-fish bearing) that are required under the Washington Forest Practices Act. Within these required riparian buffer areas surrounding, a “grow” prescription is applied in the baseline model, where no harvesting or silvicultural treatment is applied to these constrained acres corresponding to delineated riparian management areas (i.e., stratum CSM- fish bearing streams).

Baseline carbon in long-term storage in wood products was calculated based on projected harvest volume removals from the FVS model. Harvest volumes were broken out into the categories of softwood sawlog, softwood pulp, hardwood pulp and hardwood sawlog by referencing the merchantability standards in FVS. Harvest volumes were converted to biomass by applying species-specific specific gravity values references in the *USFS Handbook* and *Miles and Smith 2009*. Biomass values were then converted to units of tCO₂e using appropriate conversion factors. Carbon transferred into wood products was estimated by applying mill efficiency values sourced from the California ARB Compliance Offset Protocol, for western Washington.

Carbon in wood products was then summed across the established wood categories and distributed to various end-wood product classes referenced from the California ARB Compliance Offset Protocol, for western Washington. Carbon in long-term storage was then summed for in-use wood products and wood products in landfills to produce annual total carbon (tCO₂e) stored in in-use and landfill by applying the appropriate 100-year storage factors taken from the ACR IFM Methodology. Emissions due to burning logging slash are conservatively assumed in the baseline to be zero. Verifier checks of the baseline carbon storage in harvested wood confirmed the accuracy of the PP’s calculations in accordance with the ACR IFM Methodology.

2.12 Leakage

According to the ACR IFM Methodology, there may be no leakage beyond *de minimis* levels through activity shifting to other lands owned, or under management control, by the timber rights owner. If the project decreases wood product production by greater than 5% relative to the baseline then the

Project Proponent and all associated landowners must demonstrate there is no leakage within their operations – i.e., on other lands they manage/operate outside the bounds of the ACR carbon project.

As described in the GHG Plan, quantification of leakage is limited to market leakage. The PP therefore asserts there is no activity shifting leakage. The Nisqually Land Trust (NLT) does own approximately 4,233 acres of forestland outside of the project area, which NLT asserts that these lands have not had any active harvesting for the past decades. The review of the project area over recent aerial imagery in GIS also confirms the PP's assertions of no harvest activity. The verifiers are reasonably assured there indeed has been no recent harvesting on the PP's ownership on the NLT lands outside the project area and that no activity shifting leakage has occurred during this reporting period.

Quantification of leakage of the project is therefore limited to market leakage. Market leakage was determined by quantifying the merchantable carbon removal in both the baseline and with-project scenarios. Carbon in long-term storage in in-use wood products and landfills was used to assess relative amounts of total wood products produced in the baseline and project. The decrease in wood production relative to the baseline was calculated to determine the applicable market leakage discount factor in accordance with the methodology. Since the project activities decrease total HWP produced by the project relative to the baseline by 25% or more over the crediting period, the leakage deduction is 40%. This leakage deduction was found to be correctly determined and correctly applied in the supporting ERT calculation workbook.

2.13 Monitoring Requirements

Section D of the GHG Plan outlines the project's monitoring plan. All appropriate data and parameters to be monitored over the life of the project are outlined including details on the unit of measurement for the data/parameter, a description of the parameter, the data source used, the measurement methodology, monitoring frequency, values applied, procedural and QA/QC references, the purpose of the data and the calculation method. The monitoring plan also indicates that each year, the project will sign and submit to ACR the required attestations confirming: the continuation of the project activities; that ownership of the project area remains clear and uncontested; and a disclosure of any negative environmental or community impacts and if necessary documented plans to mitigate any reported negative environmental or community impacts. These attestations have been included in the signed Monitoring Report for this initial reporting period.

Project monitoring is generally focused on the project's on-site carbon stocks through updates to the project's forest inventory data. A full re-inventory of the project area is to take place at least twice over each decade following validation & initial verification to allow for calibration of the growth model and improve the project's carbon sequestration estimates. In addition, affected portions of the project area will be updated periodically in response to natural disturbance events of significant forest management activities. If impacts from such events are significant, the affected areas will be re-inventoried and adjusted to reflect current on-site carbon stocks. For those years in-between when an updated inventory is carried out, on-site carbon stocks will be monitored through forest growth and yield modeling. Beyond forest inventory updates, the PP will continually monitor the general health and condition of the forest through the course of regular forest management activities including road maintenance, ecological studies, or boundary maintenance.

QA/QC procedures have been established as part of the monitoring plan and are outlined in section D2 of the GHG Plan. Both forest and desk-based QA/QC procedures are established. At least 10% of the forest inventory plots will be checked by a different cruiser than the individual who measured the plot. The plot check cruise will involve a full plot measurement to identify any issues or significant discrepancies. Any consistent error will be resolved through discussion with the cruisers who carried out the original measurements or removal of the individual if deemed necessary. The desk QA/QC procedures involve a three staged review process with the intent of ensuring that all collected data is appropriately managed and maintained, and that all subsequent calculations of the data that are incorporated into the ERT issuance are correct. This three-staged review process involves independent forester review, technical review, and senior management review.

The verifiers were provided with the five Check Cruise reports detailing the number of plots and trees checked, the number of errors identified by category (e.g., DBH, Height, Status, In/Out), and the percent error by error category. The workbook also includes all of the original plot/tree data for the check cruised plots, as well as the check cruise data. In total 10% of the forest inventory plots were check cruised (21 plots). Incorrect diameter measurements were the most common error identified during the check cruising. There were not a significant number of errors identified during the check cruise nor was any systematic bias or error found with any cruiser.

The verifiers were provided with a QA/QC Inventory Data Issues Report document outlining the dates of the QA/QC activities, corresponding plots, identification of the key issues identified, and a summary of the revisions and updates made as a result of the quality reviews. While the verifiers did uncover some issues during the verification that were apparently not caught during the project's QA/QC process, such as Issues Log item #33, the verifiers find no reason to further question the implementation or effectiveness of the established QA/QC mechanisms.

2.14 Community and Environmental Impacts

As part of the GHG Plan, ACR requires all projects to prepare and disclose an environmental and community impact assessment. ACR does not require that a particular process or tool be used for the impact assessments as long as the basic requirements are addressed. Section F1 of the project's GHG Plan outlines the Community and Environmental Impact Assessment addressing the requirements of the ACR Standard.

The project activity is improved forest management. The landowners forest management practices represent a significant improvement in carbon storage and conservation value when compared to industrial and non-industrial private forestlands in the region that emphasize higher financial return and management regimes characterized by shorter, even-aged rotations. By committing to maintain forest CO₂ stocks above the regional baseline level, the project will provide significant climate benefits through carbon sequestration.

Section C.1 of the GHG Plan covers the Regulatory Surplus Test and outlines the applicable laws and regulations. The laws and regulations outlined in Section C1 of the GHG plan were found to comprehensively identify the applicable laws that could affect the project. The verifiers assessment of these laws determined that none of them impact the project activities, and require the PP to implement the project activities, thereby demonstrating regulatory surplus. The description of

applicable laws and regulations in the GHG Plan was found to consider all of applicable laws and regulations in both the project and baseline activities.

As mentioned, the project proponent, the Nisqually Land Trust, owns approximately half the project area and the other landowner, the Nisqually Community Forest, owns the remaining portion. These two entities manage each property independently under different management plans, but collaborate to achieve common goals. The properties are managed to promote sustainable forest management, revenue generation for the community forest, habitat development and preservation, and water quality within the broader watershed boundaries.

Both NLT and NCF are private forestland owners, the PP asserts that there are no communities or other stakeholders affected by the project activities. Updates regarding project development and monitoring are discussed and communicated by their respective Boards of Directors in their scheduled board meetings, which is described more fully in Section 2.15 below. Information regarding the carbon project can be requested from the Board of Directors for each entity. As a result of the project area being privately owned and no communities or other stakeholders are affected by the project activities, there is not a detailed community consultation and communications plan. The GHG Plan indicates that the project is not a community-based project. The verifiers agree with this determination given the project ownerships and associated management systems.

The GHG Plan gives a general assessment of the project's environmental risks and impacts, covering the relevant factors outlined in the standard. Impacts have all been categorized as positive except for wildfire which has been rated as neutral; verifiers agree with these determinations. As such, there is no need to describe how negative impacts will be avoided or minimized.

Monitoring of the risks and impacts is covered in sections F.1 & D.2 of the GHG Plan which gives an outline of monitoring activities including inventories (forest measurements), calibrations of forest growth and yield modeling, and management activities and plans. Annual forest management monitoring is completed by the management staff or hired contractors by each landowner, which includes monitoring the general health and condition of the forest through the course of normal management activities including roads, recreation, wildlife, timber harvesting, and wildfire resiliency practices (silviculture, maintaining roads). Verifiers find these monitoring methods are deemed sufficient to meet the requirements of the ACR Standard (Chap 3). The GHG Plan (F.1) also includes a description on how the positive impacts contribute to the SDGs as required.

2.15 Stakeholder Comments

The GHG Plan asserts that Stakeholder comments are non-applicable. The Project Proponents, NLT and NCF are private forestland owners and adhere to their respective internally agreed upon practices of project consultation and notification on associated decision making affected by the project activity. The Nisqually Land Trust has an internal Board of Directors that guides the direction of the organization through overarching policy, however, management decisions, changes to the management plan, hiring, and other decision making occur at different levels of the organization, so long as they adhere to the overarching policy as defined by the Board of Directors. The Nisqually Community Forest makes all decisions, including management, and changes to the management plan, through their Board of Directors, as there is no staff outside the Board of Directors. The GHG Plan

indicates that the project is not a community-based project. The verifiers agree with this determination considering the project ownerships and decision-making management systems.

2.16 Validation Conclusion

During the validation assessment the verifiers identified 20 Clarifications, 11 New Information Requests, and 10 Non-Conformances. All audit findings were responded to and addressed to the satisfaction of the verifiers. Once all identified issues were adequately resolved, S&A Carbon drafted this final combined validation & verification report. After reviewing the final GHG Plan and all supporting documentation, the verifiers concluded with a reasonable level of assurance that the project is in conformance with the applicable criteria and requirements of the ACR Standards listed in Section 1.4. The findings in this report represent the final determinations of the project's conformance with the standard criteria included in the scope of this validation audit. S&A Carbon is thus able to issue a positive validation opinion of the project's design as outlined in the final GHG Plan and the projected *ex-ante* GHG emission reductions of 303,851 tCO₂e over the first 20-year crediting period.

3 Verification Activities

3.1 Project Implementation Status

As previously described in this report, the project's initial verification took place concurrently with the project's validation. The verifiers determined the project activities were implemented over the initial reporting period corresponding to the dates 7/7/2020 to 7/6/2021 in accordance with the project design established in the GHG Plan. The PP submitted a completed copy of the Monitoring Report (MR) that provides the information required in the ACR monitoring report template. The verifiers are reasonably assured there were no changes to the landowner, project area or inventory over the reporting period, and estimates of the current on-site carbon stocks based on the inventory data are provided. There was commercial harvesting over the initial reporting period with reported carbon stored long term in harvested wood products along with supporting harvest information. No project deviations occurred during the initial reporting period.

The MR outlines the data and parameters monitored over the reporting period, which are found to be consistent with the data and parameters included in the monitoring plan of the GHG Plan. The MR also includes the project's GHG emission reductions including baseline emissions, project emissions, leakage emissions contributions to the buffer pool, and a summary of the net GHG emission reductions at the end of the reporting period. The verifiers confirmed the accuracy of the ERT calculations and consistency with the final values reported in the MR with the supporting ERT calculation workbook.

Project level live carbon stocks were grown forward or de-grown backwards from the original inventory data (November 2020 - July 2021) depending on the specific plot inventory date. The projection was developed by deriving individual live tree annual diameter growth rates from one 10-year cycle model run of FVS-WC with no management (reflecting the limited timber harvesting) along with an adjustment based on the percent of annual growth (i.e., one growing season) from when the plot measurements were recorded. Dates of measurement were recorded for each plot, therefore allowing each tree to have a specific grow/degrow period. These projections follow the same basic processes used to degrow live stocks from the inventory to the project start date. No burning of any biomass occurred so emissions from the burning of logging slash is considered to be zero.

The verifiers performed checks on the ERT calculations for the initial reporting period to confirm the accuracy of the PP's calculations. Reporting period ERTs were also calculated using the verifier's internal calculations of end of reporting period on-site carbon stocks as the basis for the materiality checks as presented below.

3.2 Data-Checks & Materiality

A summary of selected data checks for project are provided below. The assigned ranking reflects both the size and uncertainty associated with these SSRs. These and other data checks performed (along with narrative details of the check and results) are included in the verifiers data check log.

| SSR (rank) | Data reviewed | Reported (PP) tCO ₂ e | Calculated (VB) tCO ₂ e | Dis-crepancy tCO ₂ e | Impact on misstatement/ conformance |
|--|--|-------------------------------------|---------------------------------------|------------------------------------|--|
| | Checks performed | | | | |
| Rank 1 Sum of Project stocks; end of RP (CP,TREE,t, CP,DEAD,t, CP,HWP,t, GHGP,t) | 2020-21 Inventory, volume and biomass equations, calculation methods | 823,841 | 823,833 | 8 | Impact on Materiality |
| <u>Comment:</u> Discrepancy due to slight differences in strata averages and rounding. | | | | | |
| Rank 2 Sum of Project stocks; beginning of RP (CP,TREE,t, CP,DEAD,t, CP,HWP,t, GHGP,t) | 2020-21 Inventory, volume and biomass estimates, grown modeling results, grown tree list. Model appropriateness and use. Data systems. | 805,762 | 805,762 | 0 | No impact on Materiality |
| | Checks of accumulations and correct transfer to Monitoring Report | | | | |
| Comment: NA | | | | | |
| Rank 3 20-Yr Average Baseline stocks (live and dead tree CO ₂ e) CBSL,AVE (total) | Monitoring Report and supporting modeling documents. Model appropriateness and use. Data systems. | 597,265 | 597,265 | 0 | No impact on Materiality |
| | Checks of accumulations and correct transfer to Monitoring Report. | | | | |
| Comment: NA | | | | | |

| | | | | | |
|---|--|--------------|--------------|---|--------------------------|
| Rank 4 Emissions Reduction at t (before buffer deduction) (CACR,t) | Monitoring Report | 38,312 | 38,312 | 0 | No impact on Materiality |
| | Checks that all PP entries are correct. Check sources. Checks that calculations within the worksheet are correct. Calculation check uses PP values. | | | | |
| Comment: NA | | | | | |
| Rank 5 Market Leakage Discount Factor (LK) | Monitoring Report, supporting documents. | 21,170 (40%) | 21,170 (40%) | 0 | No impact on Materiality |
| Rank 6 Buffer Credits and Risk Rating (TBt) | Monitoring Report, calculation workbooks, supporting worksheets | 6,557 | 6,557 | 0 | No impact on Materiality |
| | Checks that all PP entries are correct. Check risk rating and calculations have been calculated correctly. | | | | |
| Comment: NA | | | | | |
| Rank 7 Baseline Harvested Wood Products (CBSL,HWP,t) | Monitoring Report, supporting worksheets | 5,723 | 5,723 | 0 | No impact on Materiality |
| | Model results, HWP worksheet. Confirm model projections and sums. Correct use of appropriate mill efficiencies, product classes and long-term storage factors. | | | | |
| Comment: NA | | | | | |
| Rank 8 HWP Project (CP,HWP,t) | Monitoring Report, supporting worksheets On-site observations, GIS review, interviews with the PP. | 637 | 637 | 0 | No impact on Materiality |

| | | | | | |
|---|--|-------------|-------------|---|-----------------------------|
| | Checks of mill receipts and HWP storage calculations. Correct use of appropriate mill efficiencies, product classes and long-term storage factors. | | | | |
| Rank 9 Total Uncertainty (UNcT) | Monitoring Report supporting worksheets | 0 (<10%) | 0 (<10%) | 0 | No impact on Materiality |
| | Use PP data for 2020-21 inventory stocks; checks the calculation of total uncertainty was done correctly. | | | | |
| Comment: Below 10% threshold, so total uncertainty is zero. | | | | | |

The verification team must state with reasonable assurance that the percent overstatement of the project's total reported GHG emission reductions and removal enhancements is no more than a 5.00% overstatement of the "true" GHG emission reductions and removal enhancements, as calculated by the verifier using the equation below. The analysis must consider all errors, omissions or misstatements, for the subset of data included in the data checks. Any errors, omissions or misstatements are identified separately in the table above.

$$\% \text{ Error} = \frac{\text{Project Emission Reduction Assertion} - \text{Verifier Emission Reduction Recalculation}}{\text{Verifier Emission Reduction Recalculation}} \times 100$$

$$\text{Percent error} = \frac{[38,312 - 38,303]}{38,303} \times 100 = 0.023\%$$

| Project ERTs – Verifier ERTs* (tCO2e) | Verifier ERTs (w/o buffer deductions) (tCO2e) | Calculated Materiality (%error) |
|---------------------------------------|---|---------------------------------|
| 8 | 38,303 | 0.023% |

*Note: In this column, a positive value represents *over-reporting* by the PP.

The Materiality Calculation shows that the project is 0.023%, over-reporting. Therefore, the project is less than the 5.0% materiality threshold.

3.3 Verification Conclusion

During the verification process, the S&A verification team gathered evidence to evaluate the project design, the project implementation, and assess the accuracy of the GHG assertion associated with the reporting period.

After review of all project information, procedures, calculations, and supporting documentation, S&A confirms that Project reporting is accurate and consistent with all aforementioned criteria and requirements of the ACR Standards. S&A confirms all verification activities, including objectives, scope and criteria, level of assurance, and project documentation adhere to the ACR Standards. S&A

concludes without any qualifications or limiting conditions that the Project meets the requirements of the ACR Standards.

S&A has verified the PP's GHG assertion of **38,312 tCO₂e** for the Reporting Period of 7/7/2020 to 7/6/2021.

| Vintage Year | Total ERTs (tCO ₂ e) | Total ERTs to Buffer Pool (tCO ₂ e) | ERTs Net (tCO ₂ e) |
|----------------------|---------------------------------|--|-------------------------------|
| 2020 | 18,684 | 3,198 | 15,486 |
| 2021 | 19,628 | 3,359 | 16,269 |
| Total for RP1 | 38,312 | 6,557 | 31,755 |

S&A has also verified removals and other ERTs, which is summarized in the table below for the Reporting Period of 7/7/2020 to 7/6/2021. Removals are calculated based on equation 24 within the *ACR Errata and Clarifications v1.3* (April 2022). They are defined as “*The mass of GHGs removed from the atmosphere over a specific period relative to an approved baseline. In the context of this methodology, removals are carbon stock changes resulting in sequestration attributable to the with-project scenario*”.

| Vintage Year | Total ERTs (tCO ₂ e) | Other ERTs (tCO ₂ e) | Removals (tCO ₂ e) |
|----------------------|---------------------------------|---------------------------------|-------------------------------|
| 2020 | 18,684 | 13,208 | 5,476 |
| 2021 | 19,628 | 13,875 | 5,753 |
| Total for RP1 | 38,312 | 27,083 | 11,229 |

Appendix A: Reference List

Project Documents

| Document Description | | Filename |
|----------------------|----------------|---|
| Monitoring Report | | Rainier_RP1_MonitoringReport_3_21_23 Updated_Signed.pdf (signed by the project proponent on 3/22/23) |
| GHG Plan | | RainierGateway_GHGPlan_3_30_23.pdf |
| PDD | | RainierGateway_ACR_PDA_PDD_10_14_22.pdf |
| Calculations | ERT & HWP | RainierGateway_RP_ERT_HWP_3_6_2023.xlsx |
| | CO2 | RainierGateway_Start_RP_CO2_2_28_2023.xlsx |
| | Site Index | RainierGateway_SiteIndex_Wcores_9_16_22.xlsx |
| | Monitoring | RainierGateway_100Yr_calcs_3_6_2023.xlsx |
| | Site Visit CO2 | RainierGateway_SV_CO2_2_28_2023.xlsx |
| | Regeneration | RainierGateway_Regeneration_Calcs_5_13_22.xlsx |
| | Discount Rates | Wtd_Avg_DctRt_CsvEas_5_2_22.xlsx |
| Inventory | Raw Data | RainierGateway_Inventory_Master_8_30_22.csv |
| | Methodology | RainierGateway_CarbonPlotMethodology_2_28_23.pdf |
| Check Cruise | | Check cruise reports.pdf (5) |
| Data Revisions | | InventoryDataIssues_7_26_2021_AW_Responses.docx |

| | | |
|-------------------------|---|---|
| Modeling | R_Code.zip | |
| | FVS_Output.zip | |
| | IndTreeGrow.zip | |
| | Key.zip | |
| | FVSall.db | |
| | RainierGateway_FVS_Plots_10_06_2022.csv | |
| | optimizationCheck_02_28_23 | |
| Stumpage Values | InstrSVtables2021_2ndHalf.pdf | |
| FSC Certification | Nisqually Community Forest FSC Cert.pdf | |
| Forest Mgmt Plans | MRG Management Plan 2011.pdf NCF Management Plan 12.19.pdf | |
| Ownership | Deeds.zip | |
| Carbon Project Contract | CDMA_Bluesource_Nisqually Community Forest_Final Terms-FullyExecuted_Redacted.pdf | |
| Spatial | Boundary | RainierGateway_Boundary_2_15_23.shp |
| | Plots | RainierGateway_Plots_3_16_22.shp Fishnet_10_7_20_label.shp |
| | RMZ | RainierGateway_RMZ_2_17_23.shp |
| | Strata | RainierGateway_Strata_2_17_23.shp |
| | Non PAB Lands | BusyWild2_11N_12.shp |
| | | LewisCo_NisquallyLT_parcel.shp |
| | | PierceCo_NisquallyLT_parcel.shp |
| | | ThurstonCo_NisquallyLT_parcel.shp |

Verifier Documents

| Document Description | Filename |
|------------------------------|--|
| Project Specific COI Form | ACR576_COI Form.docx |
| Validation/Verification Plan | ACR576_Validation-Verification Plan.docx |
| Sampling Plan | ACR576_Sampling Plan.docx |
| Data Check Log | ACR576_DataCheckLog_8March2023.xlsx |
| Issues Log | ACR576_IssuesLog_v2.5_8March2023_Closed.docx |
| Site Visit t-Test | ACR576_Rainier T-Test Worksheet_updated 15Nov2022.xlsx |

APPENDIX B: FINDINGS LIST

| Verifier Issue | Issue ID: | 22-1 | Status: Closed | Checked by: BS | Date Identified 25-Mar-22 |
|--|------------------------|---|--|----------------|--|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | Comments |
| ACR Standard, v6.0, 6B; IFM Methodology v1.3, C2 | CarbonPlot Methodology | New information request. <i>May impact conformance; no materiality</i> | <p>As described in the Stratification section of the Carbon Plot Methodology document (pg2): <i>"The stratification is based on the most recent geospatial file, aerial or lidar imagery, and inventory data."</i></p> <p>Verifiers understand the stratification process was additionally based on the type of forest management regime and ownership. Please review and revise to adequately describe the basis and process used to stratify the project area along with the associated results of this process (i.e., strata used for the project).</p> <p>Also within this document (pgs 30-32), the PP provides schematics on the walk-through methodology (Examples 1-3). If these are figures were developed from sources other than the PP, please include the associated document references if applicable.</p> | | RainierGateway_CarbonPlotMethodology_6_4_21 |
| | | | <p><u>August 8, 2022 Findings</u></p> <p>Verifiers acknowledge the Carbon Plot Methodology has been revised to include additional descriptive information on the stratification process. While this information helps clarify the process used to stratify the project area, it lacks information on the basis in delineating the stream and riparian strata (CSM and ISM). Specifically, how were they determined and what criteria and/or physical features were used in delineating their associated boundaries (e.g., WA DNR Forest Practices Rules, annual high-water line, stream type, etc.)? Please also include the associated acronyms associated with the strata (CSM, ISM, MGA, MGB).</p> <p>The PP included the references used for the walk-thru schematics in the revised Carbon Plot Methodology document. This issue item is closed.</p> | | RainierGateway_CarbonPlotMethodology_5_25_22 |
| | | | <p><u>November 3, 2022 Findings</u></p> <p>Verifiers acknowledge the Carbon Plot Methodology has been revised to include how stream and riparian strata were delineated as well as the criteria for each. The WA DNR Forest Practice Rules were the basis of delineation. The WA State Hydro centerlines were used to delineate stream locations. For fish bearing streams, channel stream width was assumed to be 10 ft wide with 50 ft buffers on either side of the channel to create the CSM strata. For all streams, a 100 ft buffer on either side of the channel was delineated to create the ISM layer.</p> | | RainierGateway_CarbonPlotMethodology_10_3_22 |

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| | | A table on pg 2 provides the Strata acronyms and their names (CSM: Core Stream Management Zones, ISM: Inner & Outer Stream Management Zones, MGA: Management A: Nisqually Community Forest, MGB: Management B: Nisqually Land Trust Part). As the methods and definitions to describe the stratification process has now been included in the revised Methodology document, this issue is now closed. | |
| PP Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 26-May-22 | Description of the stratification process has been revised in the most updated version of the inventory methodology. The source of the walkthrough schematics has been added to the inventory methodology. | <i>RainierGateway_CarbonPlotMethodology_5_25_22</i> | |
| 7-Oct-22 | Description of the stratification of the 4 strata has been updated in the inventory methodology. Further detail was included on how the strata was delineated including stream data used and description of each strata. | | |

| Verifier Issue | Issue ID: | 22-2 | Status: Closed | Checked by: MD | Date Identified | 25-Mar-22 |
|-----------------------------------|------------------|---|--|--|-----------------|--|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments |
| ACR Standard, v6.0, Section 4.A.3 | E1. Baseline | Clarification. May impact materiality or conformance. | The PP explains in the Readme in the 100Yr_calcs workbook that the outputs from FVS & R in the various FVSPivot tabs are the inputs for the other tabs in the workbook. Please explain the following: (1) Some cells in the baseline FVSPivot_baserev contain revenue values but the downstream tab Baseline_Revenue contains no revenue for the same cell. For example, see in the StandID_RX column, RainierGateway_4_VTV_2020 or RainierGateway_5_VTV_2020 or RainierGateway_6_VTV_2020. (2) Some cells in the baseline FVSPivot_baseharv contain values but the downstream tab Baseline_Harvest CO2e contains no value for the same cell. For example see in the StandID_RX column, RainierGateway_4_VTV_2020 or RainierGateway_5_VTV_2020 or RainierGateway_6_VTV_2020. | | | RainierGateway_100Yr_calcs_03_16_2022.xlsx |
| | | | <u>August 8, 2022 Findings</u> Verifiers are satisfied with the clarifications provided here. Though questions remain regarding the values in the “FVSPivot” tabs, these will be addressed in Issue22-24. This issue is considered closed. | | | RainierGateway_100Yr_calcs_05_06_2022 |
| PP Response | | | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP | | |

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| 22-May-22 | <p>1) The FVSPivot_baserev tab shows all possible timber harvest revenues (in nominal dollars per 5 year period for each RX/Plot combination). These values shows all possible revenue outputs for all RX/plot combinations.</p> <ul style="list-style-type: none"> The Baseline_Revenue tab (rows 8 and following) multiplies all possible timber harvest revenues by the number of acres chosen by the optimization (Column G in the Baseline_Summary tab). The Baseline_Revenue tab values (Rows 8 and following) only includes timber harvest revenues (in discounted dollars * number of acres for each Plot/RX combination). For example, Cell G30 in the Baseline_Summary tab shows that 18.86 acres are assigned to the “RainierGateway_7_VTV_2020” RX/Plot combination. This value is multiplied by the Nominal \$ in cell F31 of the FVSPivot_baserev, and a discount rate is applied to cell D35 in the Baseline_Revenue tab. In the Baseline_Revenue tab, Row 5 calculates the Discounted \$/year for each time period, and Row 6 calculates the Discounted \$/acre/year <p>2) For baseline harvest, FVSPivot_baseharv shows all possibilities. The Baseline Harvest multiplies FVSPivot_baseharv by the number of acres in Column G of the Baseline_Summary tab, so only the RX/Plot combinations selected by the optimization have non-zero values in the Baseline_Harvest tab.</p> | RainierGateway_100Yr_calcs_05_06_2022 |
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| Verifier Issue | Issue ID: | 22-3 | Status: Closed | Checked by: MD | Date Identified | 25-Mar-22 |
|-----------------------------------|------------------|---|--|----------------|-----------------|--|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments |
| ACR Standard, v6.0, Section 4.A.3 | E1. Baseline | Clarification. May impact materiality or conformance. | Please document the complete units of the values in the workbook tables. For example, some of the units are given in the various baseline FVSPivot tables but verifiers are not clear of the units (per acre or total, per year or total, etc.). In the Revenue tabs please indicate whether the values are net present values or nominal. In the baseline wood products tab, the harvest acres table, are these acres per year or total for the period? | | | RainierGateway_100Yr_calcs_03_16_2022.xlsx |
| | | | August 8, 2022 Findings The PP has added the units in all 5 of the FVSPivot tabs within the revised 100yr calc workbook. Verifiers understand all revenue values within these tabs are nominal and the baseline revenue tab is discounted to NPV (units added). In the baseline wood products tab, are the values provided in cells below row 7 in cubic feet? And are the units in cells D4 in green tons/year? Please clarify. | | | RainierGateway_100Yr_calcs_05_06_2022 |

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| | | November 3, 2022 Findings Verifiers confirmed the labels were modified in the Baseline_WoodProducts tab. The header now indicates “Baseline Harvested Total (merch+pulp) green tons (calculated from MCUFT cubic feet)” above Columns D-N. Cell D4 would then be referenced as Harvest green tons / year. Issue is considered closed. | RainierGateway_100Yr_calcs_10_06_2022 |
| PP Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-May-22 | Units for all 5 of the FVSPivot tabs have had the units updated at the upper left of the tab, this clarification will be added for future projects. As mentioned in 22-2, all revenues in FVS pivot tables are nominal, Baseline Revenue tabs are discounted to NPV, and labels/units were added to these tabs to further clarify. | RainierGateway_100Yr_calcs_05_06_2022 | |
| 30-Sept-22 | In the Baseline_WoodProducts tab, units are as follows: <ul style="list-style-type: none"> Columns D-N: Rows 4-5 are Green tons, after Row 7 are MCUFT from FVSPivot_ woodprod tab (labeled in cell D2). Columns P-Z: Rows 4-5 are cords, after Row 7 are PULPCUFT from FVSPivot_ woodprod tab Column AB-AL: Rows 4-5 are Mbf, after Row 7 are BDFT from FVSPivot_ woodprod tab Labels were slightly modified to further clarify units in the Baseline_WoodProducts tab. | | |

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| Verifier Issue | Issue ID: | 22-4 | Status: | Closed | Checked by: | MD/EM | Date Identified | 25-Mar-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |
| ACR Standard, v6.0, Section 4.A.3 | E1. Baseline | Clarification. May impact materiality or conformance. | Verifiers question the logic utilized in the steady decline in baseline harvested volume per HARVESTED ACRE per year. Specifically, the economic viability of harvesting such a minor amount of wood per HARVESTED ACRE / year in some of the periods (Verifiers reviewed the Harvest Acres in the baseline wood products tab). Please clarify and/or revise if needed. | | | | RainierGateway_100Yr_calcs_03_16_2022.xlsx | |
| | | | August 8, 2022 Findings The PP has adjusted the baseline model prescriptions to ensure the harvest volume/acre values are reasonable for all time periods in addressing the economic viability of the baseline harvests within the revised 100 yr calcs workbook. Verifiers have reviewed the keyword files and are not clear where these adjustments were made, the “CC” keyword files still appear to have a 60-year rotation and the intermediate thinnings still start at 0” diameter. Can you clarify which keyword files and which keywords were changed? | | | | RainierGateway_100Yr_calcs_05_06_2022 | |
| | | | November 3, 2022 Findings | | | | | |

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| | | Verifiers have reviewed the revised modeling documents and have confirmed that the keywords were revised to reflect the increase in the minimum harvest levels. This issue is considered closed. | |
| <i>PP Response</i> | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-May-22 | <p>We agree that this decline in harvest volumes/ac led to unreasonably low sawtimber removals, especially for time periods several decades in the future. For those future harvests, the majority of removals were pulp, not sawtimber, which was unreasonable given the low regional value of pulp. Adjustments have been made to prescriptions to ensure that harvest volume/acre is reasonable for all time periods, including periods multiple decades in the future.</p> <ul style="list-style-type: none"> The clearcut prescription that was implemented for the MGA strata previously did not have a rotation (it had an initial regen harvest, followed by uneven-aged structure based management). We modified this so that the clearcut prescription has a 55 year rotation, with an intermediated PCT and an intermediate CT. As with the initial regeneration harvest, the subsequent regeneration harvest retains 10% of residual basal area. For intermediate thinnings, we previously thinned all the way down to 0" DBH. This is likely unreasonable for the commercial thinnings. We updated the prescriptions so that only merchantable stems are removed in commercial thins. <p>These modifications to the prescriptions allowed more stems to be in the sawtimber diameter range, and increased the MBF/ac harvest to reasonable levels for all time periods.</p> | <i>RainierGateway_100Yr_calcs_05_06_2022</i> | |
| 7-Oct-2022 | In order to eliminate unreasonable small harvests a 3Mbf/ac minimum was established for all clearcut and VT harvests. For additional conservatism, the 3Mbf/ac minimum was increased from 3Mbf/ac minimum to a 5 Mbf/ac minimum. The MINHARV is used to set a minimum merchantable harvest requirement. | | |



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| Verifier Issue | Issue ID: | 22-5 | Status: | Closed | Checked by: | MD | Date Identified | 25-Mar-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |
| ACR Standard, v6.0, Section 4.A.3 | E1. Baseline | Clarification. | Verifiers confirmed the stumpage rates, referenced in the cost assumptions in the PP GHG plan document and provided in the Stumpage Prices tab in the 100yr_calcs workbook, for all species but red alder sawtimber. The PP has chosen a lower rate | | | | <i>RainierGateway_100Yr_calcs_03_16_2022.xlsx</i> | |

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| | | <i>May impact materiality or conformance.</i> | than what is in the DNR publication for this species. Please explain the reason for the variation. | |
| | | | August 8, 2022 Findings In the revised 100 yr calc workbook, the PP has corrected the stumpage rates for red alder, black cottonwood and Alaska cedar to be consistent with the stumpage rates reported by WA DNR. Verifiers concur with these corrected stumpage rates and this issue is now closed. | <i>RainierGateway_100Yr_calcs_05_06_2022</i> <i>DNR Publication: InstrSVtables2021_2nd Half.pdf</i> |
| PP Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | This was an error that has been updated as suggested. Red alder incorrectly applied the 'other hardwoods' stumpage, instead of the red alder stumpage. This has been updated to \$363 to be consistent with the DNR publication. It was also noted that black cottonwood and Alaska Cedar Stumpage values also did not align with the DNR report – both of these stumpages were also updated to align with the DNR stumpage report. | | | <i>RainierGateway_100Yr_calcs_05_06_2022</i> <i>DNR Publication: InstrSVtables2021_2ndHalf.pdf</i> |

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| Verifier Issue | Issue ID: | 22-6 | Status: | Closed | Checked by: | BS | Date Identified | 4-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |
| | GHG Plan Section E.1 | Clarification. <i>May impact materiality or conformance.</i> | Verifiers note potential discrepancies, typos and/or needed clarifications within the Monitoring Report, which are listed below. Please review, clarify and/or revise as appropriate. 1. Section III, Part 5 – Carbon Sequestration, Monitoring Plan: typo “well as” 2. Section IV, Part 3 – Please include the dates the inventory was conducted. 3. Section V, Defect, Description – typo “perfect” 4. Section VI, Part 2, Project Emissions – The MR refers to using the NE FVS variant while the GHG Plan (pg 33) notes using the FVS-WC variant. There is also reference to <i>May 2021</i> in the modeling process; verifiers are not clear on the significance of that time period. Lastly, verifiers are not clear on the modeling steps (items 1-4) in this section as whether the process to estimate the stocks for the end or beginning of the reporting period is being described. 5. Section VI, Part 2, Project Emissions (table below item 4) – The data summarized in this table appears to reflect the mean values (tCO ₂ e/ac) of the beginning of the reporting period not the end of the reporting period as noted in the sentence above this table. Also, please review the units in this table for completeness and clarity (i.e., tCO ₂ e vs tCO ₂). | | | | <i>RainierGateway_RP1_MonitoringReport_3_17_22</i> <i>RainierGateway_GHGPlan_3_17_22</i> <i>RainierGateway_CarbonPlotMethodology_6_4_21</i> <i>RainierGateway_Start_RP_CO2_03_16_2022</i> | |

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| | | <p><u>August 1, 2022 Findings</u> Verifiers acknowledge the revised Monitoring Report in which the PP has:</p> <ol style="list-style-type: none"> 1. Corrected the typo in Section III, Part 5; 2. Added the dates the inventory in Section IV, Part 3; 3. Corrected the typo in Section V, Defect, Description; and 4. Clarified the modeling process in estimating the project stocks for the start and end of the Reporting Period. <p>These above issue items are closed.</p> <ol style="list-style-type: none"> 1. 5. The PP has revised the sentence associated with the data summarized in Section VI, Part 2, Project Emissions (table below item 4) to reflect the end of the reporting period. Please review and revise the units in this section as there are still errors present (i.e., tCO₂e vs tCO₂; and tCO₂e/ac vs tCO₂). 2. 3. 6. The buffer percentage listed in the Section VI, Part 4 is different than the percentage listed in the revised GHG Plan and ERT workbook. Please review and revise as appropriate. | <p><i>DRAFT_RainierGateway_RP1_Monitoring Report_5_26_22</i></p> <p><i>RainierGateway_GHGPlan_5_26_22</i></p> <p><i>RainierGateway_RP_ERT_HWP_05_06_2022</i></p> |
| | | <p><u>November 3, 2022</u> 5. Verifiers reviewed Section VI, Part 2 of the revised Monitoring Report. The column heading “Total GHG, P tCO₂e” in the table at the end of Part 2 should be updated to “Total GHG, P tCO₂e/acre.” Please review and revise as appropriate. 4. 6. Verifiers confirmed that GHG Plan (section B8), ERT Workbook (ACR_IFM_ERT_Calcs tab), and Monitoring report (Section VI, Part 4) all list buffer consistently as 17.11%. This issue item is closed</p> | <p><i>RainierGateway_RP_ERT_HWP_10_06_2022</i></p> <p><i>DRAFT_RainierGateway_RP1_Monitoring Report_10_7_22</i></p> <p><i>RainierGateway_GHGPlan_10_7_22</i></p> |
| | | <p><u>November 30, 2022</u> For item 5, the PP has updated the heading in the revised Monitoring Report (Section VI, Part 2) to “Total GHG, P tCO₂e/acre”. This issue item and the entire issue is now closed.</p> | <p><i>DRAFT_RainierGateway_RP1_Monitoring Report_11_29_22</i></p> |
| PP Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-May-22 | All discrepancies/clarifications have been updated in the most recent version of the monitoring report. | DRAFT_RainierGateway_RP1_MonitoringReport_5_26_22 | |
| 7-Oct-22 | 5) Discrepancies between the units have been updated. 6) The buffer percentage has been corrected in the Monitoring Report. | | |
| 22-Nov-22 | 5) Column header has been updated to “Total GHG, P tCO ₂ e/acre” | DRAFT_RainierGateway_RP1_MonitoringReport_11_29_22 | |

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| Verifier Issue | Issue ID: | 22-7 | Status: | Closed | Checked by: | BS | Date Identified | 4-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | Comments |
|-------------------------|---|---|--|--|
| ACR Standard, v6.0, 6.E | Monitoring Report | Possible non conformance. <i>No materiality impact</i> | Verifiers note the Monitoring Report submitted is based on ACR's version 1.0 form. Please update to the latest MR form version (v3.0). | <i>RainierGateway_RP1_MonitoringReport_3_17_22</i> <i>acr-monitoring-report-template_version-3_FINALformatted</i> |
| | | | August 8, 2022 Findings The PP has updated the revised MR to use the latest ACR MR form v3.0. This issue is now closed. | <i>DRAFT_RainierGateway_RP1_Monitoring Report_5_26_22</i> |
| | | | November 3, 2022 Findings This issue has been reopened. Apologies! I missed that the latest MR form version is v4.0 (May 2022). Please update to the latest MR form version. | |
| | | | November 29, 2022 Findings The PP has updated the MR to the latest ACR MR form version (v4.0). This issue is closed. | <i>DRAFT_RainierGateway_RP1_Monitoring Report_11_29_22</i> |
| PP Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | The Monitoring Report has been updated to v3.0. | | | DRAFT_RainierGateway_RP1_MonitoringReport_5_26_22 |
| 22-Nov-22 | No worries! MR has been updated to v4.0 (May 2022). | | | DRAFT_RainierGateway_RP1_MonitoringReport_11_29_22 |

| Verifier Issue | Issue ID: | 22-8 | Status: | Closed | Checked by: | BS | Date Identified | 4-Apr-22 |
|-----------------------|----------------------------|--|--|---------------|--------------------|--|------------------------|-----------------|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| IFM Methodology v1.3 | GHG Plan- various sections | Non conformance. <i>No materiality impact</i> | The equation references in column A of the "ACR IFM ERT Calcs" tab within the CO2 workbook show inconsistent references when compared to the ACR equations referenced in the GHG Plan and the IFM ACR standard (v1.3) - they appear to be outdated (e.g., see (cell A27). Please review and revise as appropriate. | | | <i>RainierGateway_Start_RP_CO2_03_16_2022</i> <i>RainierGateway_GHGPlan_3_17_22</i> | | |
| | | | August 8, 2022 Findings Verifiers acknowledge the PP changed several IFM equation references in Column A in the revised ERT workbook (tab "ACR IFM ERT Calcs") and that these changes were based on using ACR's <i>ERT calculator methodology</i> workbook. Verifiers understand | | | <i>ACR_IFM_ERTcalculator_Methodology_v 2.0_2022.07.06</i> | | |

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| | | | this ACR workbook is applicable for projects using the ACR IFM Methodology v2.0. For Rainier Gateway IFM, the ACR IFM Methodology v1.3 is the criteria being used for this validation and verification. While conceptually similar, some equations are different between these two methodology documents (e.g., Equation 24). The calculation equations in the PP's ERT workbook need to be revised to reference those equations specified in ACR IFM Methodology v1.3. Please review and revise as appropriate. | <i>RainierGateway_RP_ERT_HWP_05_06_2022</i> |
| | | | <u>November 3, 2022 Findings</u> Verifiers find some of the equation numbers referencing the ACR IFM Methodology v1.3 within the revised ERT workbook (column A, tab "ACR IFM ERT Calcs") are still incorrect (e.g., ΔCP_t in cell A25). This issue remains open until the equation references have been updated. | <i>RainierGateway_RP_ERT_HWP_10_06_2022</i> |
| | | | <u>November 29, 2022 Findings</u> The PP notes the equation references in the ERT calculator/ERT workbook (column A, tab "ACR IFM ERT Calcs") do not align with the equations listed in the IFM Methodology v1.3. Verifiers agree, the equation references in the ERT calculator are based on IFM Methodology v2.0. To resolve this issue, the PP has removed column A equation references but has retained column B the equation names in the revised ERT workbook. Verifiers find this reasonable and verifiable; this issue is considered closed. | <i>RainierGateway_RP_ERT_HWP_11_28_2022</i> |
| PP Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | We updated several equation references in Column A (including A27) by using the "ERT Calculator" link available from this URL: https://americancarbonregistry.org/carbon-accounting/standards-methodologies/improved-forest-management-ifm-methodology-for-non-federal-u-s-forestlands | | | <i>RainierGateway_RP_ERT_HWP_05_06_2022</i> |
| 30-Sep-22 | Equation reference numbers in column A have been updated, including for Equation 24 in the 'ACR IFM ERT Calcs;' tab of the ERT workbook. | | | |
| 28-Nov-22 | It appears the equations in the ACR provided online ERT calculator do not match the ACR IFM v1.3 protocol. Several rows don't line up exactly with a formula, and are intermediate calculations. To reduce confusion, column A equation references were removed from the ERT workbook. Please reference column B for equation names. | | | <i>RainierGateway_RP_ERT_HWP_11_28_2022</i> |

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| Verifier Issue | Issue ID: | 22-9 | Status: | Closed | Checked by: | BS | Date Identified | 4-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |

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| IFM Methodology v1.3, 3.1.1 | GHG Plan, Sections D & E | Clarification. <i>May impact materiality or conformance.</i> | <p>In the Monitoring Plan (Section D) of the GHG Plan, for monitoring Forest Carbon (pg 28), the QA/QC section states “<i>The inventory will use a random sample design...</i>”. Verifiers understand the plot allocation for the inventory is based on a systematic grid. Please clarify.</p> <p>Also, the GHG Plan notes in a few sections (e.g., pg 29) that there are 204 plots. This aligns with the number of plots used within the CO2 workbook and the plot spatial data. The Carbon Plot Methodology document differs and lists 207 plots. Were some plots dropped during the inventory process? Please review, clarify and/or revise as needed.</p> | <p><i>RainierGateway_GHGPlan_3_17_22</i></p> <p><i>RainierGateway_CarbonPlotMethodology_6_4_21</i></p> <p><i>RainierGateway_Start_RP_CO2_03_16_2022</i></p> <p><i>RainierGateway_Plots_8_25_21_1.shp</i></p> |
| | | | <p>August 8, 2022 Findings</p> <p>The PP has clarified the inventory plot allocation method was based on systematic random sampling (i.e., a systematic grid with a random start) in the revised carbon plot methodology document.</p> <p>The PP has also clarified the total number of plots allocated for the inventory (204 plots) in the revised the carbon plot methodology, which is now consistent with the other noted project documents. Verifiers understand the previously reported 207 plots was outdated and not correct. The PP notes plot 76 was dropped as it was too hazardous to measure. Per ACR guidance, the PP has removed the area surrounding this plot (based on the avg plot area, ~16 acres). Verifiers concur with this approach as it reasonable, conservative and meets ACR guidance for dropping plots due to hazardous conditions. This issue is considered closed.</p> | <p><i>RainierGateway_CarbonPlotMethodology_5_25_22</i></p> <p><i>RainierGateway_Plots_8_25_21_1.shp</i></p> <p><i>RainierGateway_invStrata_8_25_21.shp</i></p> |
| PP Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | <p>Description of the sampling method in the GHG has been updated to “systematic random sampling”</p> <p>The inventory methodology has been updated to list 204 plots. The number of plots listed in the inventory methodology was outdated, however, 1 plot (76) was dropped during the inventory because it was too hazardous to measure. The permanent hazard was also removed from the project area via guidance from ACR.</p> | | | <p><i>RainierGateway_GHGPlan_5_26_22</i></p> <p><i>RainierGateway_CarbonPlotMethodology_5_25_22</i></p> |

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| Verifier Issue | Issue ID: | 22-10 | Status: Closed | Checked by: BS | Date Identified 4-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | Comments |
| IFM Methodology v1.3, (C3-3.1.1; D2,D3) | Carbon Plot Methodology (pg 2) | New information request. | Please provide the spatial data for the entire grid that was used to allocate the inventory plots. | | <p><i>RainierGateway_Plots_8_25_21_1.shp</i></p> <p><i>RainierGateway_CarbonPlotMethodology_6_4_21</i></p> |

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| | | May impact materiality or conformance. | |
| | | August 8, 2022 Findings The PP has provided the request initial plot grid (fishnet). This issue is closed. | Fishnet_10_7_20_label.shp |
| PP Response | | | |
| Date | PP Comment | | Additional evidence submitted for review by PP |
| 22-May-22 | The entire plot grid, prior to selecting plots within the PAB, has been added to the shared verification folder. | | Fishnet_10_7_20_label.shp |

| Verifier Issue | Issue ID: | 22-11 | Status: Closed | Checked by: BS | Date Identified | 4-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments |
| ACR Standard, v6.0, Sections 2.B.3 & 4.A.3; IFM Methodology v1.3, C.5 | GHG Plan Section E | Non conformance. No materiality impact | <p>Verifiers find the GHG Plan lacks clarity and supporting descriptive details on the methods, calculations and/or results to comply with the noted sections of the ACR Standards and ACR's GHG Plan template's specifications.</p> <p>Please address the following items:</p> <ol style="list-style-type: none"> 1. In Section E1, verifiers request additional descriptive details on the baseline constraints that were incorporated into the baseline model. While Section C1 provides the relevant laws, regulations, statutes, legal rulings, and other regulatory frameworks that affect the project activity, verifiers are trying to ascertain which law/regulation/statutes were utilized to determine the constraints that were used within the modeling process. If publicly available spatial data was utilized, please reference these sources within the GHG plan. 5. 2. While there is a supporting description in Section E1 on how the 20-yr baseline value was determined, the actual value being utilized for the project does not appear to be presented in the Plan (i.e., 602,439 tCO₂e). 6. 3. At the end of Section E1, the GHG Plan notes: "The figure below depicts the projected baseline stocks, average baseline stock for the first crediting period, and projected with-project stocks (see below for derivation of with-project stock projections)". Figure E1-1 does not appear to depict the baseline, the average baseline and the | | | <p>RainierGateway_GHGPlan_3_17_22</p> <p>RainierGateway_RP_ERT_HWP_03_16_2022</p> <p>ACR Template for GHG Project Plans.docx</p> |

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| | | | <p>project stocks within this figure. Also, the Y-axis in this graph appears to provide tCO₂e/ac rather than total tCO₂e values.</p> <p>8.</p> <p>4. In Section E3, Leakage, while the table denotes the values utilized in the leakage calculation, verifiers request additional descriptive details on the ACR equations that were utilized in the calculation for leakage. The text should also note the leakage value that was calculated.</p> <p>5. In Section E4, Uncertainty, while the text includes the ACR equations used in calculating the uncertainty values, there are no sample calculations, and in some cases, no values provided for baseline, project and total project uncertainties. Verifiers acknowledge these formulas are provided in the ERT workbook, but they also need to be included in the GHG Plan for long term monitoring.</p> | |
| <p>IFM Methodology v1.3, C.3</p> | | | <p><u>August 8, 2022 Findings</u></p> <p>Verifiers have reviewed the revised GHG Plan for the items 1-5 noted above and have the following comments:</p> <p>1. The PP has added descriptive details to Section E.1 to clarify the relevant laws and regulations that were evaluated and those that were applicable to the project and were ultimately incorporated as a baseline constraint within the baseline model. The PP has also provided the publicly available spatial data that was in delineating these constraints (i.e., Stream classifications). This issue item is closed.</p> <p>9.</p> <p>2. Verifiers agree with the PP that there is no specific requirement within the IFM v1.3 Standard. However, the ACR template for GHG Project Plans (Section E.1) states: “Detail the GHG quantification methodology for the baseline scenario including all relevant emissions or removals. Provide sample calculations wherever possible.” As this is the initial reporting period and the GHG Plan will likely be referenced in subsequent reporting periods over the crediting period, verifiers believe the 20-yr average baseline value is an important source for understanding and determining GHG emissions/removals and that its documentation and associated supporting calculations are justified. Please include the sample calculations for Equation 5 (IFM v1.3) and the associated resulting 20-year average baseline value within the GHG Plan.</p> <p>10.</p> <p>3. The PP has revised the title for Figure E1-1. The Y-axis units in this graph appears to show tCO₂e/ac values; please review and update as appropriate.</p> <p>11.</p> | <p><i>RainierGateway_GHGPlan_5_26_22</i></p> <p><i>ACR Template for GHG Project Plans.docx</i></p> <p><i>StateStreams.zip</i></p> <p><i>RainierGateway_RP_ERT_HWP_05_06_2022</i></p> |

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| | | <p>12. Also, Section C3 of the ACR IFM Methodology (pg 18) specifies: “The IFM The Project Proponent shall provide a graph of the projected baseline stocking levels and the long-term average baseline stocking level for the entire Crediting Period....” Please include this graph in the GHG Plan or another appropriate project document. If this has already provided, please let us know which document it is located.</p> <p>13.</p> <p>14.</p> <p>4. Within Section E3, the PP has provided the additional descriptive details and sample calculations for estimating leakage. This issue item is closed.</p> <p>15.</p> <p>5. The PP has added a sample calculation for Total Project Uncertainty (UNC_t) in Section E5. The text references ACR IFM equation 10 for the calculating total project uncertainty. This is not correct. Also, the value in the text shows 5.38% while the sample calculation lists 5.35%. Please review and update.</p> | |
| | | <p>November 3, 2022</p> <p>2. Verifiers confirmed that sample calculation for long-term average baseline stocking (20-year) was added to the GHG plan (pg 41).</p> <p>3. Verifiers confirmed that Figure E1-1 Y-axis title was corrected from “CO2e (metric tons)” to “CO2e (metric tons / acre)” (pg 41).</p> <p>5. Verifiers confirmed that sample ACR IFM equations for uncertainty were added to the GHG plan for Baseline, Project, and Total Uncertainty with a note that the sampled calculations didn’t reflect the actual values. The uncertainty values in the table (pg 43) matched those presented in the latest ERT workbook.</p> <p>The three issue items have been addressed. Verifiers are satisfied with the revisions and consider this issue closed.</p> | <p><i>RainierGateway_GHGPlan_10_7_22</i> <i>RainierGateway_RP_ERT_HWP_10_06_2022</i></p> |
| PP Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-May-22 | <ol style="list-style-type: none"> Section E1 Baseline Harvesting has been updated. There is no requirement to include the 20-year average baseline value in the GHG plan. This value can be found in the ERT workbook provided to verifiers in the shared verification folder. This language was incorrect and has been corrected. A sample leakage calculation has been added A sample uncertainty calculation has been added | <p><i>RainierGateway_GHGPlan_5_26_22</i> <i>RainierGateway_RP_ERT_HWP_05_06_2022</i></p> | |
| 7-Oct-22 | 1)Closed | <p><i>RainierGateway_GHGPlan_10_7_22</i> <i>RainierGateway_RP_ERT_HWP_10_06_2022</i></p> | |

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| | <p>2) A sample calculation of Equation 5 (IFM v1.3) Long-Term Average Baseline Stocking Level Sample Calculation (20-year) has been added to the GHG Plan.</p> <p>3) The figure has been updated to metric tons/ acre, instead of metric tons.</p> <p>4) Closed</p> <p>5) Uncertainty values and example calculations have been updated in the GHG Plan.</p> | |
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| Verifier Issue | Issue ID: | 22-12 | Status: Closed | Checked by: BS | Date Identified | 4-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments |
| IFM Methodology v1.3, (3.1.2.1) | Carbon Plot Methodology (pg 17-18); Monitoring Report; Section V (pg 4) | Clarification. May impact materiality or conformance. | ACR methodology for standing dead trees specifies 4 decay classes. The PP’s inventory data utilized 5 decay classes (based on an ARB IFM protocol specification) and notes 4 decay classes are used in the Project Monitoring section of the MR (decay class). | | | RainierGateway_Plots_8_25_21_1.shp RainierGateway_CarbonPlotMethodology_6_4_21 |
| | | | Verifiers understand the PP uses a cross-walk table within the RP_CO2 workbook (“Decay Class” tab) to translate the inventory data (5-classes) into ACR’s Methodology specification (4 classes). The verifier seeks justification for this re-classification, as the criteria for the inventory measurements appear not to precisely align with ACR’s class criteria (regarding branch presence in particular). We also request a brief description be added to the appropriate project document(s) that acknowledges the departure from the ACR specification and clarifies the PP’s revised approach used in assessing decay classes. | | | RainierGateway_RP1_MonitoringReport_3_17_22 RainierGateway_Start_RP_CO2_03_16_2022 |
| | | | <u>August 9, 2022 Findings</u> The PP has updated the GHG Plan (Section D1) and the Monitoring Report (Section V) to acknowledge the reclassification of the measured decay class 5 to ACR decay class 4. The crosswalk applied to trees recorded as a decay class 5 to a decay class 4 of the ACR standard is considered acceptable. This issue is therefore considered closed. | | | |
| PP Response | | | | | | |
| Date | PP Comment | | | | Additional evidence submitted for review by PP | |
| 22-May-22 | The ACR IFM methodology v1.3 does not specify a reclassification methodology between the 5 decay classes and 4 decay classes, however ACR has advised that reclassifying decay class 5 to 4, the next most conservative class, is acceptable. This has been updated in the next version of the ACR IFM Methodology in section 4.2.3.1 of IFM V2.0. The GHG plan and Monitoring Report have been updated to acknowledge the reclassification of the measured decay class 5 to ACR decay class 4. | | | | | |

| Verifier Issue | Issue ID: | 22-13 | Status: | Closed | Checked by: | BS | Date Identified | 5-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | | Comments |
| ACR Standard, v6.0 (Chap 3, Table 2) | Section A3 | New information request. <i>Conformance Issue</i> | Table A3.1 of the GHG Plan states: “The project start date of July 7th, 2020 coincides with the signing of the Carbon Marketing & Development Agreement between Nisqually Land Trust and Bluesource and Nisqually Community Forest and Bluesource (both recorded on July 7, 2020). This has been provided separately for verification purposes.” Verifiers request these agreements in order to validated & verify the project start date. | | | | | RainierGateway_GHGPlan_3_17_22 |
| | | | <u>August 9, 2022 Findings</u> The PP has provided a redacted version of the CDMA. The CDMA was executed on July 7, 2020 between Bluesource and the Nisqually Community Forest. Verifiers have confirmed that this date coincides with the July 7, 2020 project start date listed in the GHG Plan and MR. This issue is now closed. | | | | | CDMA_Bluesource_Nisqually Community Forest_Final Terms-FullyExecuted_Redacted RainierGateway_GHGPlan_5_26_22 DRAFT_RainierGateway_RP1_Monitoring Report_5_26_22 |
| PP Response | | | | | | | | |
| Date | PP Comment | | | | | Additional evidence submitted for review by PP | | |
| 22-May-22 | A redacted version of the CDMA has been provided in the shared folder. | | | | | CDMA_Bluesource_Nisqually Community Forest_Final Terms-FullyExecuted_Redacted | | |

| Verifier Issue | | Issue ID: | 22-14 | Status: | Closed | Checked by: | BS | Date Identified | 5-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | | |
| ACR Standard, v6.0, Section 2.B.6 | Section D.2 | New information request. <i>May impact conformance; no materiality issue</i> | The QA/QC Procedures section of the Carbon Plot Methodology document notes at least 10% of plots were visited to conduct an audit of the inventory crews and a checking cruising summary report was completed by Resilient Forestry that was then provided to Bluesource. Verifiers request this check cruise summary. We anticipate it will include, at a minimum, the following information: (1) the inventory plots that were visited; (2) the dates of the visit; (3) the individuals performing the audit; and (4) the results of the check audit including any corrective actions taken. | | | RainierGateway_GHGPlan_3_17_22 | | | |
| | | | Also, the QA/QC Field Procedures section of the GHG Plan states the check cruising process completed an audit of at least 5% of the plots. Please review and revise the project documents as appropriate. | | | RainierGateway_Plots_8_25_21_1.shp RainierGateway_CarbonPlotMethodology_6_4_21 | | | |

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| | | | Lastly, while the GHG plan outlines a detailed QA/QC desk review process, the verifiers request supporting documentation demonstrating the implementation of the QA/QC system, including the dates of review, individuals responsible for reviews, issues identified during reviews, and a summary of revisions/updates made as a result of the QA/QC reviews. | |
| | | | <p>August 9, 2022 Findings</p> <p>The PP has provided the check cruise reports prepared by the inventory contractor (Resilient Forestry). There were 5 check cruise reports occurring between 12/1/2020 and 7/21/2021. A total of 21 plots were evaluated (10% of the total 204 plots). Check cruise reports contain: (1) the inventory plots that were visited; (2) the dates of the visit; (3) the individuals performing the audit; and (4) the results of the check audit including any corrective actions taken.</p> <p>The PP has revised the GHG Plan to reflect the percentage of plots that were check cruised (10%).</p> <p>The PP has provided the QA/QC documents related to the inventory and the data collection process including the inventory contractor's check cruise reports; summary of data issues between Bluesource and Resilient Forestry during data collection and how these were resolved; and the workbook used to compile the final inventory data. Therefore, this issue is now closed.</p> | <p>Check cruise report 2020-12-01 Check cruise report 2021-06-21 Check cruise report 2021-07-06 Check cruise report 2021-07-17 Check cruise report 2021-07-21</p> <p>RainierGateway_GHGPlan_5_26_22</p> <p>InventoryDataIssues_7_26_2021_AW_Responses</p> <p>RainierGateway_Inventory_Master_5_3_22</p> |
| PP Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | <p>The check cruise summary has been provided in the shared verification folder.</p> <p>The GHG plan has been revised to reflect the 10% check cruise.</p> <p>Documentation outlining errors found in the data and corrections applied have been added to the shared folder Inventory Data folder. The internal desk QA/QC process was conducted by Aaron Wykhuis from 7/25/21-8/6/21.</p> | | | <p>Check cruise report 2020-12-01 Check cruise report 2021-06-29 Check cruise report 2021-07-06 Check cruise report 2021-07-17 Check cruise report 2021-07-21 InventoryDataIssues_7_26_2021_AW_Responses</p> <p>RainierGateway_CarbonPlotMethodology_5_25_22 RainierGateway_GHGPlan_5_26_22</p> |

| <u>Verifier Issue</u> | <u>Issue ID:</u> | <u>22-15</u> | <u>Status:</u> | <u>Closed</u> | <u>Checked by:</u> | <u>BS/EP</u> | <u>Date Identified</u> | <u>5-Apr-22</u> |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| ACR IFM Methodology, | Section E3 | New information request. | In regard to quantifying leakage, Section E.3 of the GHG Plan states; "Quantification of leakage is limited to market leakage, as no activity-shifting leakage is allowed by the methodology beyond de minimis levels." The noted Nisqually Land Trust (NLT) | | | RainierGateway_GHGPlan_3_17_22 Nisqually website (4/5/22) | | |

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| v6.0, Section D.7 | | Conformance Issue | <p>web site currently lists ownership of 7,561 acres (as of 12/2019), implying there is the potential for an additional ~4,233 acres of land outside of the project area.</p> <p>The verifiers seek additional supporting evidence on the PP's lands outside of the project area boundary to demonstrate there is no activity shifting leakage. The verifiers request spatial data for the overall NLT ownership that encompasses both the project area and non-project lands to further assess the potential for timber harvesting outside of the project area boundaries and within the PP's ownership.</p> <p>Additionally, Figure A-6 within the GHG Plan suggests that all area owned by Rainier Gateway is included in the Rainier Gateway IFM project. Please review, clarify and/or revise as needed.</p> | https://nisquallylandtrust.org/our-lands-and-projects/protected-areas/about-our-protected-areas/ |
| | | | <p>August 9, 2022 Findings Figure A-6 within the GHG Plan is updated and shows NCF and NLT ownership outside the project area. The PP has provided the spatial data for the entire NLT ownership.</p> <p>In addition, verifiers conducted a conference call with staff and consultants on April 8, 2022, to discuss a variety of topics including such items as management history, land use, common practice in the region, forest management plan development, long term monitoring, project accounting, and contractor/consultant roles and responsibilities. Individuals of the meeting included Jeanette Dorner (executive director of the Nisqually Land Trust), Jason Hall (executive director of the Nisqually River Foundation), and Joe Kane (consultant to NFT, former executive director of the Nisqually Land Trust and former member of the Board). Interviews confirmed that NLT lands have not had any active harvesting for the past decades. This also confirms the clarifications provided by the project developer below.</p> <p>The review of the project area over recent aerial imagery in GIS also conveys the PP's assertions of no harvest activity. The verifiers are reasonably assured there indeed has been no recent harvesting on the PP's ownership on the NLT lands outside the project area and that no activity shifting leakage has occurred during this reporting period.</p> <p>This issue is considered closed.</p> | <p><i>RainierGateway_GHGPlan_5_26_22</i></p> <p><i>BusyWild2_11N_12.shp</i> <i>LewisCo_NisquallyLT_parcel.shp</i> <i>PierceCo_NisquallyLT_parcel.shp</i> <i>ThurstonCo_NisquallyLT_parcel.shp</i> <i>Nisqually Community Forest FSC Cert</i></p> |
| PP Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | <p>Spatial data for overall NLT ownership have been provided in the share folder including non-project lands. Figure A-6 has been revised</p> <p>NLT is not currently commercially harvesting on any lands outside of the project area. The following demonstrates there is no activity shifting leakage.</p> | | | <p><i>BusyWild2_11N_12</i> <i>LewisCo_NisquallyLT_parcel.shp</i> <i>PierceCo_NisquallyLT_parcel.shp</i> <i>ThurstonCo_NisquallyLT_parcel.shp</i></p> |

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| <p>NLT Lands within PAB: ACR Approved Long-term forest management plan. Plan is currently being reviewed by ACR and has been provided in the shared folder.</p> <p>NCF Lands within the PAB: FSC Certified, certification has been provided in the shared folder.</p> <p>NCF Busy Wild Parcels: Acquired after start date and currently being added to FSC certification. These acres may eventually be added to the project through PDA.</p> <p>NLT Parcels listed below: Included in the provided FSC certification, however, no commercial harvesting has occurred since the project start date. 21711120400, 21711120000, 21711120100, 21711120200, 21711120500, 22612110000, 22612130000, 22613110000, 22612240000, 22613120100, 0216124003, 0216124004, 0216124005, 0416221004, 0416224002, 0416221014, 0416212017, 0416221006, 0416232070, 0416232016, 0416232709, 0416232058, 0516173000</p> <p>All NLT lands outside of the PAB not mentioned above: Currently, and since the project start date, no commercial harvesting has occurred on NLT lands outside of the PAB on these acres. All lands outside of the PAB have long term stewardship management plans, which will be reviewed and approved by ACR prior to any commercial harvesting being implemented in the future.</p> | Nisqually Community Forest FSC Cert |
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| Verifier Issue | Issue ID: | 22-16 | Status: Closed | Checked by: BS | Date Identified | 5-Apr-22 |
|---|------------------|---|--|----------------|---|----------|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | Comments | |
| IFM Methodology v1.3, C1; ACR Standard, v6.0, Section 2.A (table 1) | Section E | Clarification. May impact materiality or conformance. | <p>The Data Collection section of the Carbon Plot Methodology indicates the walk-through (WT) methodology would be used for those plots that are near “hard” edges such as the project boundary or excluded roads. Column L (walk through repetition) of the Tree Data tab within the RP_CO2 workbook indicates that there were no inventory plots where the WT method was applied by the cruisers. Verifiers are seeking to confirm the plots where the WT method was utilized.</p> <p>Also, within this same workbook and tab, Column G (common name), lists “other species” for Plots 1 and 74; these species are all less than 2 inches (DBH). Given there are numerous shrubs within the project area (e.g., willow species), verifiers question the appropriateness of including these unknown species within the project stocks estimate. Given the ACR Standards’ principle on conservatism, verifiers believe these unknown species should be removed from the tree list. Please provide supporting evidence that justifies the inclusion of these unknown species or remove them from the tree list.</p> | | <p><i>RainierGateway_Plots_8_25_21_1.shp</i> <i>RainierGateway_CarbonPlotMethodology_6_4_21</i></p> <p><i>RainierGateway_Start_RP_CO2_03_16_2022</i></p> | |

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| | | <p>August 9, 2022 Findings</p> <p>Verifiers understand the plots where walk-through trees were recorded have been documented in the Column AC “walk-through” in the Inventory Master (denoted by a “1”). As noted, the “walk-through repetition”, Column L in the “tree data” tab within the revised RP_CO2 workbook suggests no walk-through trees were recorded. Please update so there is consistency between project documents regarding where the walk-through method was utilized.</p> <p>Verifiers acknowledge the PP has removed trees labeled as “other species” for plots 1 and 74 in the revised Start RP_CO2 workbook, which is consistent with the Inventory Master workbook. However, there are numerous tabs that still contain these trees within the revised SiteVisit_CO2 workbook. Please review and update as appropriate.</p> | <p><i>RainierGateway_Inventory_Master_5_3_22</i></p> <p><i>RainierGateway_Start_RP_CO2_05_05_2022</i></p> <p><i>RainierGateway_SiteVisit_CO2_03_16_2022</i></p> |
| | | <p>November 4, 2022 Findings</p> <p>Verifiers reviewed the revised project documents. The Inventory Master file shows that 55 trees were walkthrough trees (Column AC). The TreeData tab of the latest RP_CO2 worksheet indicates that every tree is a walkthrough tree (Column L). Please update so there is consistency between project documents regarding where the walk-through method was utilized. This issue item remains open.</p> <p>Verifier reviewed the treelists tab in the latest SV_CO2 workbook, the RP_CO2 workbook and the Inventory Master file. Trees labeled as “other species” have been removed in these revised documents. This issue item is closed.</p> | <p><i>RainierGateway_SV_CO2_10_06_2022</i></p> <p><i>RainierGateway_Start_RP_CO2_10_06_2022</i></p> <p><i>RainierGateway_Inventory_Master_5_3_22</i></p> |
| | | <p>November 30, 2022 Findings</p> <p>The PP has revised the RP_CO2 workbook to clarify the walk-through trees by relabeling the headings and values within Columns L and AB (“tree data” tab). Verifiers are satisfied with this update and the corresponding changes made to this revised workbook; there is now consistency in the number of reported walk-through trees between this revised workbook and the Inventory Master file (55 walk-through trees). This issue is now closed.</p> | <p><i>RainierGateway_Inventory_Master_8_30_22</i></p> <p><i>RainierGateway_Start_RP_CO2_11_28_2022</i></p> |
| PP Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-May-22 | The RainierGateway_Inventory_Master workbook has been provided. Walkthrough trees are indicated in the “walkthrough” column denoted by a “1”. | <i>RainierGateway_Inventory_Master_5_3_22</i> | |
| | Trees coded as 298 in plots 1 and 74 have been removed. | | |
| 6 Oct 2022 | The Site Visit CO2 workbook has been updated, and includes all of the inventory updates. | | |
| 28 Nov 22 | The labels here may be confusing. Column L of the TreeData tab indicates how many times each individual row is counted in CO2 calculations. The formulas are setup in the CO2 calcs workbook so that if “2” is entered in Column L, the tree record will be counted twice, without needing duplicate tree records. | <i>RainierGateway_Start_RP_CO2_11_28_2022</i> | |

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| <p>If a “1” is entered, each tree record is counted once. We decided to duplicate rows for walkthrough tree records, so all values in column “L” are “1”.</p> <p>To indicate whether a tree record is a walkthrough duplicate record, column “AB” in the Tree Data tab (“Walkthrough Copy”) indicates a “1” if a record is duplicated, and a “0” if it is not a walkthrough duplicate. Note that if you filter column AB in TreeData tab, there are 55 tree records that are duplicated, the same 55 tree records labelled as “1” in the Walkthrough column of the Inventory Master file.</p> <p>To reduce confusion, column L has been labelled “Tree record repetitions”.</p> | |
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| Verifier Issue | Issue ID: | 22-17 | Status: | Closed | Checked by: | EP | Date Identified | 8-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | | Comments |
| ACR Standard, v6.0, IFM Methodology v1.3, section A2 | Section A.3 | Clarification. Conformance Issue | Third-party certification: the report says that only NFC is FSC FM certified, however, it seems like that both NLT and NCF are member of the same FSC certificate group: https://app.powerbi.com/view?r=eyJrIjoib2U3NGMyNWZlZTAxNS00MzVhLWExNmMtOThhZjdiYjQ4MWNkIiwidCI6IjEyNGU2OWRlLWVmNjUtNDk2Yi05NmE5LTVkNTZiZWxkZDI5MSIsImMiOiJ9 | | | | | RainierGateway_GHGPlan_3_17_22 |
| | | | August 9, 2022 Findings Verifiers acknowledge this confirmation. An updated version of the GHG plan was provided in response to other findings also raised. It is noted that the project proponent utilizes a combination of FSC Certification on approximately half the project area (Nisqually Community Forest), and an ACR approved management plan on the other half of the project area (Nisqually Land Trust). This issue is therefore closed. | | | | | RainierGateway_GHGPlan_5_26_22 Nisqually Community Forest FSC Cert |
| PP Response | | | | | | | | |
| Date | PP Comment | | | | | Additional evidence submitted for review by PP | | |
| 22-May-22 | Both entities are listed on the FSC group certificate. All NCF lands are certified/being certified, while only a subset of the NLT lands are certified. See response to 22-15. | | | | | Nisqually Community Forest FSC Cert | | |

| Verifier Issue | Issue ID: | 22-18 | Status: Closed | Checked by: EP | Date Identified | 8-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | Comments | |

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| ACR Standard, v6.0, Section 4.A.1 | Section C.1 | Clarification. <i>May impact conformance; no materiality issue</i> | Verifiers note some minor typos and/or areas where further clarifications may be needed in the GHG Plan. Specific items include: 1. Typo in the word "Regulatory" in the section heading (pg 21) 2. Paris agreements, 2016 is not listed on Binding International Agreements. 3. Please review if the "National Wild and Scenic Rivers Act" should apply. 4. Please review if the "WAC 222-10-041" should apply. | <i>RainierGateway_GHGPlan_3_17_22</i> |
| | | | August 9, 2022 Findings Verifiers acknowledge this confirmation. It is noted that an updated version of the GHG plan was provided in response to the finding raised. Typos and additional legislation have been added to the GHG plan. Section E1. Baseline explains how the constraints are incorporated through the prescriptions in the project area. This issue is therefore closed. | <i>RainierGateway_GHGPlan_5_26_22</i> |
| PP Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | 1. Corrected 2. Paris Agreement, 2016 has been added. 3. The National Wild and Scenic River Act does not apply 4. WAC 222 has been added separately to the list for clarity. All sections of WAC 222, including WAC 222-10-041 were reviewed as relevant regulatory framework that may affect the project activity. | | | <i>RainierGateway_GHGPlan_5_26_22</i> |

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| Verifier Issue | Issue ID: | 22-19 | Status: | Closed | Checked by: | EP | Date Identified | 8-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| ACR Standard, v6.0, Section 6.B; IFM Methodology Section D.6 | Monitoring report | Clarification. <i>May impact materiality or conformance.</i> | Within the Monitoring Report, Table in section 6 states: " <i>Timber harvests took place during the July 7, 2020 – July 6, 2021, monitoring period. Inputs of carbon in long-term storage in wood products in the with-project case, CP, HWP,1, is summarized below.</i> " The table says that total HWP t CO2 is 0 for the reporting period. In Section VI (5) "Net GHG Emission Reductions/Removals" of the Monitoring Report, HWP Project is shown to be 637 t CO2. Please review and revise as needed. Also, as the project decreases wood product production by >5% relative to the baseline, the PP must demonstrate that there is no leakage within their operations. Such demonstration must include one of the 3 elements outlined in the methodology: | | | <i>RainierGateway_RP1_MonitoringReport_3_17_22</i> <i>RainierGateway_RP_ERT_HWP_03_16_2022</i> | | |

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| | | <ul style="list-style-type: none"> • Historical records covering all Project Proponent ownership trends in harvest volumes paired with records from the with-project time period showing no deviation from historical trends over most recent 10-year average; or • Forest management plans prepared ≥24 months prior to the start of the project showing harvest plans on all owned/managed lands paired with records from the with-project time period showing no deviation from management plans; or • Entity-wide management certification that requires sustainable practices (programs can include FSC, SFI, or ATFS). Management certification must cover all entity owned lands with active timber management programs. <p>As evidence to support this, the verifiers request which of 3 elements outlined in the ACR methodology is used to demonstrate that there is no leakage within the project area. For instance: 1) a shapefile for the entire PP's ownership and 2) evidence that the FSC certificate applicable to the project area covers all of the PP's lands.</p> | |
| | | <p><u>August 9, 2022 Findings</u></p> <p>Updated Monitoring Report still provides inconsistent HWP values. Within the Monitoring Report, Table in section VI (2) states: <i>"Timber harvests took place during the July 7, 2020 – July 6, 2021, monitoring period. Inputs of carbon in long-term storage in wood products in the with-project case, CP, HWP,1, is summarized below."</i> The table on row "2" (page 7) says that total HWP t CO2 is 0 for the reporting period. However, in Section VI (5), page 8, "Net GHG Emission Reductions/Removals", HWP Project is shown to be 637 t CO2. Please review and revise as needed.</p> <p>Updated information for the full ownership in response to finding 20-15 was also provided. Information provided confirms that: NCF lands within the PAB are FSC Certified, verifiers reviewed FSC certificate. NLT Lands within PAB have a Long-term Forest management plan. Forest management plan was developed and approved by local environmental entity in 2011. The Plan is currently being reviewed by ACR. For Project Proponent lands outside of the project, PP area utilizes a combination of FSC certification, and no commercial timber harvesting.</p> <p>Interviews with PP and review of imagery confirmed that NLT has not commercially harvesting on any lands outside of the project area during the reporting period. Further, some NLT parcels are also FSC certified (parcels 21711120400, 21711120000, 21711120100, 21711120200, 21711120500, 22612110000, 22612130000, 22613110000, 22612240000, 22613120100, 0216124003, 0216124004, 0216124005, 0416221004, 0416224002, 0416221014, 0416212017, 0416221006, 0416232070, 0416232016, 0416232709, 0416232058, 0516173000).</p> | <p><i>RainierGateway_RP1_MonitoringReport_5_26_22</i></p> <p><i>RainierGateway_RP_ERT_HWP_05_06_2022</i></p> <p><i>Nisqually Community Forest FSC Cert</i></p> <p><i>RainierGateway_GHGPlan_5_26_22</i></p> |

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| | | <p>November 3, 2022 Findings Based on an e-mail from ACR on October 5, 2022 (G.Burns), verifiers understand ACR has finished reviewing NLT's forest management plan and approved it.</p> <p>Verifiers confirm the HWP Project values reported in the ERT_HWP workbook (tab "Actual RP HWP Steps 4 & 5") are consistent with the values within the revised Monitoring Report (Section IV part 2 and 5 (637 tCO2)).</p> <p>Before this issue can be closed, verifiers note a potential typo regarding harvesting within the MR (Section VI, part 2, item 4): "... No harvests or significant disturbances took place during the intervening period." Please clarify and/or revise as appropriate.</p> | <p><i>DRAFT_RainierGateway_RP1_Monitoring Report_10_7_22</i></p> <p><i>RainierGateway_RP_ERT_HWP_10_06_2022</i></p> <p><i>E-mail_ACR_NLT_FMP_approval_5Oct2022</i></p> |
| | | <p>November 30, 2022 Findings Verifiers acknowledge the PP has revised the Monitoring Report (Section VI, Part 2, item 4) to reflect that harvesting took place during the reporting period. Verifiers are satisfied with this revision and the issue is now considered closed.</p> | <p><i>DRAFT_RainierGateway_RP1_Monitoring Report_11_29_22</i></p> |

PP Response

| Date | PP Comment | Additional evidence submitted for review by PP |
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| 16-April-22 | <p>The GHG plan and Monitoring report have been updated to reflect correct values for HWPs during the first reporting period.</p> <p>Please see response to 22-15 demonstrating no activity shifting leakage. Table A3.1 in the GHG plan has been updated for clarity on how the project meets the leakage requirement for lands outside the PAB.</p> | <p><i>RainierGateway_RP1_MonitoringReport_5_26_22</i></p> <p><i>RainierGateway_GHGPlan_5_26_22</i></p> |
| 7-Oct-22 | The table in Section VI (2) has been updated to include the correct value of carbon in long-term storage in wood products in the with-project scenario. | <i>DRAFT_RainierGateway_RP1_MonitoringReport_10_7_22</i> |
| 22-Nov-22 | Harvesting took place on the project area during the reporting period. The statement in Section VI, Part 2, Item 4 has been revised. | <i>DRAFT_RainierGateway_RP1_MonitoringReport_11_29_22</i> |

| Verifier Issue | Issue ID: | 22-20 | Status: Closed | Checked by: EP | Date Identified | 8-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | Comments | | |
| ACR Standard, v6.0, Sections 2.B.1 & 3 (Table 2) | Deeds | New information request. May impact materiality or conformance. | Deed for parcel #61523300 which appears to be within the project area was not provided. Please review, clarify and/or provide as appropriate. | <p><i>NLT S25 Deed</i> <i>NCF S13, S14, S15 Deed</i> <i>NCF S13,14,15 Deed</i> <i>NLT S22 & S23 Deed</i> <i>NLT S23 & S24 Deed</i></p> | | |

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| | | August 9, 2022 Findings: The verifiers acknowledge receipt of the deed for parcel #61523300. Verifiers reviewed Deed for parcel #61523300. The parcel is included in the project area and NLT is the parcel's owner. This issue is now closed. | 2010_07_Hancock 2_Bargain & Sale Deed_0615233000 (Re-Recorded) |
| PP Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 26_May-22 | The deed has been provided in the verification folder. | 2010_07_Hancock 2_Bargain & Sale Deed_0615233000 (Re-Recorded) | |

| Verifier Issue | Issue ID: | 22-21 | Status: Closed | Checked by: EP | Date Identified | 8-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | Comments | |
| ACR Standard, v6.0, Sections 2.B.1 & 3 (Table 2) | Deeds | New information request. <i>May impact materiality or conformance.</i> | <p>The verifiers checked the project boundary's spatial data provided against a variety of publicly available datasets to assess the accuracy of the asserted spatial boundaries of the project. Among the spatial datasets checked included the Federal, State, Tribal, etc. Protected Areas Land Ownership areas available through the USDA GeoSpatial Data Gateway website. Generally, good alignment was found with corresponding federal, state and tribal boundaries. 13 parcels appear to be completely included in the project area. However, when the total deeded acres are summed, verifiers found a value that is less than the total project area acres.</p> <p>The verifiers ask the PP to review the project area and to provide background information on the difference of deed's parcel area vs the project's spatial data for the boundary area. They also request summary information of the standardized processes followed for delineation of the project area boundary, outlining the data sources used in the process, as well as QA/QC procedures to ensure quality and accuracy of the final boundary.</p> | | RainierGateway_GHGPlan_3_17_22 NLT S25 Deed NCF S13, S14, S15 Deed NCF S13,14,15 Deed NLT S22 & S23 Deed NLT S23 & S24 Deed | |
| | | | August 9, 2022 Findings: The verifiers acknowledge and accept the PP's explanation of the project boundary area. While it is still considered reasonable to expect to see similar acreage between tax parcels and owner spatial data, verifiers considered that PP approach is more conservative, since the project area (3328 ac) is smaller than total tax parcel acreage (3418 ac). Thus, this isn't considered to be a material issue and doesn't have an impact on the carbon stock calculations for the project. This finding is therefore considered closed. | | NLT S25 Deed NCF S13, S14, S15 Deed NCF S13,14,15 Deed NLT S22 & S23 Deed NLT S23 & S24 Deed 2010_07_Hancock 2_Bargain & Sale Deed_0615233000 (Re-Recorded) BusyWild2_11N_12.shp LewisCo_NisquallyLT_parcel.shp PierceCo_NisquallyLT_parcel.shp ThurstonCo_NisquallyLT_parcel.shp | |

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| PP Response | | |
| Date | PP Comment | Additional evidence submitted for review by PP |
| 26_May-22 | <p>The spatial file provided by the landowner is their most up to date and accurate property boundary geospatial file. Bluesource conservatively adjusted this boundary where overlap was found between the landowner provided file and PLSS section boundaries, Federal lands, and Tribal lands. Any minor overlap with adjacent private land boundaries via tax parcel layers was not adjusted as the landowner provided shapefile is more up to date than publicly available tax parcel layers. After all initial spatial editing is complete, the boundary is reviewed by a senior member of the Bluesource team and additional editing is prescribed if needed, followed by a submission to the landowner for review, and to identify any discrepancies from the real PAB.</p> <p>Acres are not listed in the deeds, however, any discrepancies between PAB acres and tax parcel layers are likely due to the landowner provided layer being more up to date than publicly available parcel data, and/or the additional deed that was provided, see response to 22-20.</p> | <p><i>BusyWild2_11N_12.shp</i> <i>LewisCo_NisquallyLT_parcel.shp</i> <i>PierceCo_NisquallyLT_parcel.shp</i> <i>ThurstonCo_NisquallyLT_parcel.shp</i></p> |

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| Verifier Issue | Issue ID: | 22-22 | Status: | Closed | Checked by: | EP/BS | Date Identified | 11-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |
| ACR Standard, v6.0, Chap 8, 8.A | GHG Plan, Section F1 & F2 | Possible non conformance. <i>May impact conformance; no materiality</i> | <p>Positive impacts that are expected to result from the implementation of the project activities are discussed in Section F1 of the GHG Plan. The PP asserts the project will have positive impacts on carbon sequestration, wildlife & plant habitat protection, soil and water protection and access to recreational opportunities. To meet the criteria within Chapter 8 of the ACR Standard of Section 8, verifiers have some questions and/or clarifications on how the process used to assess environmental and community impacts. Please clarify and/or revise as appropriate to comply with the noted ACR Standard's assessment. Specifically, these include the following:</p> <p>(1) Did the PP consider other environmental impacts such as biodiversity, air quality, water quantity or wildfire risk?</p> <p>(2) Regarding wildfire risk, verifiers recognize the project area is in western Washington where annual precipitation is relatively high with seasonally dry summer months. We also understand there is an increased awareness and growing concerns of the potential higher risk of wildfires in this region due to climate change (e.g., higher summer temperatures), which is highlighted in the Nisqually Community Forest's (NCF) management plan (pg 28). With less harvesting on the project</p> | | | | <p><i>RainierGateway_GHGPlan_3_17_22</i></p> <p><i>NCF Management Plan 12.19</i></p> | |

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| | | <p>(compared to baseline), verifiers anticipate there will be increases in stocking and fuel loads over the crediting period. Given the increasing risk of wildfires and likely higher fuel loads, verifiers would consider this as a potential negative environment impact resulting from the project.</p> <p>(3) The notes that increasing access for recreational opportunities is a positive impact. Does the implementation of the carbon project change the existing recreational access management plans? Is there an increase in access?</p> <p>(4) Did the PP consider community impacts such as changes to employment or revenue for local communities? Verifiers find this section of the GHG Plan does not adequately address if community impacts were assessed.</p> | |
| | | <p><u>August 9, 2022 Findings</u> Verifiers have reviewed the revised GHG and have the following comments:</p> <p>(1) Verifiers agree that the project will have positive impacts on biodiversity, air quality, water quality. Verifiers understand that the standard does not ask for monitoring positive impacts, thus the verifiers acknowledge and accept the PP's explanation of the assessment of other environmental impacts. This issue item is closed.</p> <p>(2) Since wildfire was considered as a net negative impact of the project activity, the verifiers would have liked to see the PP elaborate on this on the GHG Plan. According to ACR standard on chapter 8: "The assessment shall: 1) identify each risk/impact; 2) categorize the risk/impact as positive, negative, or neutral and substantiate the risk category; 3) describe how any negative impacts will be avoided, reduced, mitigated, or compensated; and 4) detail how risks and impacts will be monitored, and how often and by whom." Please review the GHG plan and revise as needed.</p> <p>(3) The verifiers acknowledge and accept this explanation. Recreational opportunity in these areas could be limited in the future due to more active and widespread timber harvesting operations. This issue item is considered closed.</p> <p>(4) The verifiers acknowledge and accept this explanation. The scale of the carbon project relative to the scale of overall timber operations in the region suggest that any changes to employment or revenue for local communities, positive or negative, will be marginal, and fluctuate year to year to a higher degree than any potential impact of the project. This issue item is closed.</p> | <i>RainierGateway_GHGPlan_5_26_22</i> |
| | | <p><u>November 5, 2022</u> For item 2, verifiers agree with the PP's assessment and addition of the wildfire risk rating provided within Community and Environmental Impacts Section of the revised GHG Plan (pg 48) - the PP identifies wildfire as a potential impact having a neutral risk</p> | <i>RainierGateway_GHGPlan_10_7_22</i> |

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| | | category. Section D2 of the GHG Plan also outlines the monitoring plan for wildfire risk and highlights the reduction of wildfire risk with the implementation of various management strategies (e.g., well-maintained roadways will act as fire breaks and improve accessibility for wildfire suppression). This issue item and overall issue is now closed. | |
| OPO/APD Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-May-22 | <ol style="list-style-type: none"> 1) PP considered biodiversity, air quality, water quality and wildfire risk. Water quality is listed as a net positive impact. Although biodiversity and air quality may be net positive impacts from the project activity, PP does not currently have a plan to monitor these positive impacts, therefore they are not listed. 2) Wildfire was considered as a net negative impact of the project activity, however, because the project is in a low fire risk region, the management in the project scenario is designed to reduce wildfire risk and promote late successional forest through density management of younger stands such as thinning, and the project scenario intends to maintain it's network of well-maintained roads that will serve both as fire breaks and access for wildfire suppression, we do not consider it a net negative, or positive, impact. 3) The project activity does not increase or decrease recreational opportunity in the short term, however, it does ensure long term recreational opportunity in the northern half of the property where without the addition of a more permanent timber harvesting encumbrance through the carbon project, recreational opportunity in these areas could be limited in the future due to more active and widespread timber harvesting operations. 4) The PP considered community impacts such as changes to employment or revenue for local communities. The scale of the carbon project relative to the scale of overall timber operations in the region suggest that any changes to employment or revenue for local communities, positive or negative, will be marginal, and fluctuate year to year to a higher degree than any potential impact of the project. | RainierGateway_GHGPlan_5_26_22 | |
| 7-Oct-22 | Anew would like to clarify that we did not consider wildfire a negative impact on the project, rather, considered wildfire as a potential impact. However, we do agree that wildfire risk is impacted by the project activity and should be listed in the Community and Environmental Impacts Section. Wildfire has been added as an impact with a neutral risk category due to the potential of increased wildfire risk from less intensive forest management, combined with the potential decreased wildfire risk from the mitigation strategies taken in the project scenario. The monitoring plan in Section D has been updated to reflect monitoring of wildfire risk and silviculture practices implemented to reduce risk. | | |

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| Verifier Issue | Issue ID: | 22-23 | Status: Closed | Checked by: EP | Date Identified 11-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | Comments | |

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| ACR Standard, v6.0, Chap 3 & 4 | GHG Plan, Section C.1 | New information request. <i>May impact materiality or conformance.</i> | <p>The verifiers searched the Washington Department of Fish and Wildlife (WDFW) website for any Federal and State listed threatened or endangered species that may be found within the project area. Based on the species listings provided (March 2022), three species are federally listed as Threatened that may exist in the project area: the Northern Spotted Owl, Marbled Murrelet and the Grizzly Bear.</p> <p>The Nisqually Land Trust (NLT)'s Forest Management Plan (pg 18) suggests that some of these species have been observed within the NLT's lands. For example, the FMP notes <i>"while the current extent of northern spotted owl activity on Land Trust property is unknown, an owl site center is recorded within the project area, within 0.25 mile of the eastern boundary of the northeast edge, and a nesting pair is recorded near the project area, within two miles of the northeast edge"</i>. Also, NCF FMP reads on page 17: <i>"Some species are declining in numbers across the Pacific Northwest and receive special protection through Federal or State laws. Species listed as "threatened" or "endangered" under the federal Endangered Species Act that range within areas of the Nisqually Watershed are Chinook salmon, steelhead trout, marbled murrelet, Northern spotted owl, Mazama pocket gopher, Oregon spotted frog, streaked horned lark, and Taylor's checkerspot butterfly . . ."</i></p> <p>Please confirm if any of those species noted by the WDFW and the NLT currently exist or have recently been observed in the project area and whether there are baseline constraints that should be applied to the baseline modeling.</p> | <p><i>RainierGateway_GHGPlan_3_17_22</i></p> <p>https://wdfw.wa.gov/species-habitats/at-risk/phs/maps</p> <p><i>MRG Management Plan 2011</i></p> |
| | | | <p>August 9, 2022 Findings</p> <p>Verifiers acknowledge this confirmation. It is noted that an updated version of the GHG plan was provided in response to the finding raised. Additional descriptions regarding the legislation have been added to the revised GHG plan. Section E1. Baseline explains how the constraints are incorporated through the prescriptions in the project area. In addition, verifiers conducted a conference call with staff and consultants on April 8, 2022, to discuss a variety of topics including presence of NSO in the properties. Individuals at the meeting included Jeanette Dorner (executive director of the Nisqually Land Trust), Jason Hall (executive director of the Nisqually River Foundation), and Joe Kane (consultant to NFT, former executive director of the Nisqually Land Trust and former member of the Board). The interviews also confirmed the clarifications provided by the project developer below. This issue is therefore closed.</p> | <p><i>RainierGateway_GHGPlan_5_26_22</i></p> |
| OPO/APD Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | The presence of threatened or endangered species was considered in the baseline scenario. There have been non-documented presence of NSO on the property, and no occurrences/observations of other threatened or endangered species on the property. By way of WAC 222-10-041 seasonal constraints of harvesting were considered in the baseline scenario, however it does not put an overall limit on timber harvesting within the baseline scenario. All suitable habitat requirements for NSO circles (the current | | | |

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| | undocumented occurrence of NSO is not subject to these requirements) are met through a combination of RMZ areas, restricted baseline harvesting in the NLT portion of the property, and adjacent state and federal lands. | |
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| Verifier Issue | Issue ID: | 22-24 | Status: | Closed | Checked by: | EM | Date Identified | 12-Apr-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | | Comments |
| ACR Standard, v6.0 2.B.3; 4.A.3; IFM Methodology v1.3 C.5 | GHG Plan, Section C.1 | Clarification. May impact materiality or conformance. | Verifiers note that several of the databases noted as containing “CC” prescriptions have no reported harvested carbon in the resulting databases. One example of this is stand id 93. While this stand is in the “ISM” stratum, and as such, would not be clear cut, the broader question of how the prescriptions were generated, run through FVS and then processed is in question. Even if the treatment is not ultimately used in the baseline, why are there no cut trees associated with treatments that prescribed cutting? | | | | | FVSOutput databases RainierGateway_100Yr_calcs_03_16_2022.xlsx |
| | | | <u>August 12, 2022 Findings</u> Verifiers appreciate the clarification regarding the allocation, the question regarding the harvest in stand 93 in the “CC” prescriptions remains. The CC prescription treatment option exists for plot 93 in the “FVSPivot_baseinv” tab, but the stock calculation for plot 93, and many other plots, matches the “GROW” scenario for the entire 100 year period. While verifiers understand that ultimately no acres are allocated to the “CC” treatment for plot 93, the discrepancy is concerning and calls into question the method for populating all of the “FVSPivot” tabs. Since the “FVSPivot” tabs are used to calculate and summarize the baseline, the discrepancies need to be assessed. Please clarify why/how many of the “CC” treatments in the “FVSPivot_baseinv” tab match the “GROW” treatments in terms of stock calculations. | | | | | RainierGateway_100Yr_calcs_05_06_2022 |
| | | | <u>November 7, 2022 Findings</u> Verifiers have reviewed the newest version of the 100YrCalcs workbook and are satisfied that the data for each prescription is reasonable, the “FVSPivot_baselinv” tab no longer contains harvest treatment prescriptions that match the “GROW” treatments over time. Verifiers are satisfied that harvested wood products are accounted for and included in all appropriate averages. This issue is considered closed. | | | | | RainierGateway_100Yr_calcs_10_06_2022.xlsx |
| OPO/APD Response | | | | | | | | |
| Date | PP Comment | | | | | Additional evidence submitted for review by PP | | |
| 22-May-22 | For Plot 93, no acres are being allocated to CC. Please see row 886 column G “Area Allocated” in the Baseline_Summary tab of the RainierGateway_100Yr_Calcs, where you can see all available acres for plot 93 (18.86) are allocated to VTC. | | | | | RainierGateway_100Yr_calcs_05_06_2022 | | |

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| 7-Oct-22 | <p>This scenario has been accounted for in the optimization process. Within the LP optimization, the “GROW” prescription options have been ordered such that they are always chosen if there are multiple options where NPV = 0 for a plot. In addition, there are subsequent checks following the optimization to ensure that if NPV = 0 for a plot, then it is using the “GROW” prescription (and only the “GROW” prescription). To further demonstrate that the model works as intended, an additional tab was added to the 100Yr_Calcs (Pivot showing harvest).</p> <p>In this tab, the left pivot shows the cumulative 100 year harvest volume that occurs for each plot. Prescriptions are grouped as “Grow” and “Harvest” (which is any prescription that is not “Grow”). All plots not highlighted in green have harvests associated in the optimized output (harvest and NPV are both > 0).</p> <p>The pivot table on the right breaks down how many acres for each plot are allocated to “Grow” and “Harvest”. Please note, when comparing these tables only the plots highlighted in green have no harvest, and are the only plots assigned to “Grow” only. All of the plots with harvest volume in the left table, also are “Harvest” plots.</p> <p>In addition to this tab, the script “optimizeBaseline.R” has been added to the verification folder, which is the script that implements optimization and subsequent checks.</p> | |
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| <u>Verifier Issue</u> | <u>Issue ID:</u> | <u>22-25</u> | <u>Status:</u> | <u>Closed</u> | <u>Checked by:</u> | <u>EM</u> | <u>Date Identified</u> | <u>12-Apr-22</u> |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| ACR Standard, v6.0 2.B.3; 4.A.3; IFM Methodology v1.3 C.5 | GHG Plan, Section E.1 | Non conformance. <i>May impact materiality or conformance.</i> | In relation to issues 22-2 and 22-3, at this point verifiers have been unable to confirm the values in several of the tabs in the 100yr calculation workbook. Verifiers believe this issue is related to errors in lookup values on several tabs. Until this issue is resolved verifiers are unable to confirm baseline calculations. | | | RainierGateway_100Yr_calcs_03_16_2022.xlsx | | |
| | | | <u>August 12, 2022 Findings</u> Verifiers have been unable to calculate and trace the values in the “FVSPivot” tabs back to the individual FVS output databases. In reviewing the R code provided it appears that an “FVSall” database is used in the intermediate step to house the calculated values that ultimately are imported into the FVSPivot tabs. Please provide the “FVSall” database. | | | processFVSoutput.R RainierGateway_100Yr_calcs_05_06_2022 | | |

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| | | November 5, 2022 Findings The requested “FVSall” database has been provided. This issue is now closed. | FVSall database |
| OPO/APD Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-May-22 | Please see 22-2 and 22-3, which describe how the FVSPivot tabs are used in the BaselineHarvest and BaselineRevenue tabs, and should resolve any questions around the calculations in the 100-yr calcs workbook. | RainierGateway_100Yr_calcs_05_06_2022 | |
| 30-Sep-22 | The “FVSall” database has been added to the verification folder, which shows additional tree-level intermediate outputs. | FVSall database | |

| Verifier Issue | Issue ID: | 22-26 | Status: | Closed | Checked by: | EM | Date Identified | 13-Apr-22 |
|---|--|---|--|--------|-------------|--|-----------------|--|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | | Comments |
| ACR Standard, v6.0 2.B.3; 4.A.3; IFM Methodology v1.3,C.5 | GHG Plan, Section E.1 | Clarification. May impact materiality or conformance. | As discussed during the model review call on April 13 th , 2022, there is a disconnect between the site index calculations provided and the description provided in the GHG plan. Please clarify what site index value was used when plot values were missing and update the GHG plan to reflect the appropriate references used to calculate site index. | | | | | RainierGateway_SiteIndex_Wcores_9_16_22.xlsx RainierGateway_GHGPlan_3_17_22.pdf |
| | | | <u>August 12, 2022 Findings</u> Verifiers are satisfied with the data provided and the update to the GHG plan, this issue is considered closed. | | | | | RainierGateway_GHGPlan_5_26_22 |
| OPO/APD Response | | | | | | | | |
| Date | PP Comment | | | | | Additional evidence submitted for review by PP | | |
| 22-May-22 | If a plot had no species that were cored, we assigned the plot the average site index of the tree species in the species list with the highest basal area in the entire project area. This has been updated in section E of the GHG plan. | | | | | RainierGateway_GHGPlan_5_26_22 | | |

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| Verifier Issue | Issue ID: | 22-27 | Status: | Closed | Checked by: | EM | Date Identified | 13-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| ACR Standard, v6.0 (2.B.3; 4.A.3; | GHG Plan, Section E.1 | Clarification. <i>May impact materiality or conformance.</i> | As discussed during the model review call on April 13 th , 2022, no description of the regeneration used in the FVS model is present in the GHG plan. While a spreadsheet was provided showing calculations related to regeneration used in the FVS model, no documentation was provided to explain the source of these calculations or how/when they are used. | | | RainierGateway_GHGPlan_3_17_22.pdf RainierGateway_Regeneration_Calcs.xlsx | | |

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| IFM Methodology v1.3 (C.5) | | | | |
| | | | August 12, 2022 Findings Verifiers are satisfied with the data provided and the explanation provided below, this issue is considered closed. | RainierGateway_Regeneration_Calcs.xlsx |
| OPO/APD Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | The description of the regeneration used in the FVS model is outside the scope of the technical information we are required to provide in the GHG plan. We have separately provided our regeneration inputs to the verifier for review. The total TPA regeneration of 400 TPA is advised by the Forest Managers on the property, NNRG, who consider this a standard amount of regeneration within this forest type, region, and management type. The regeneration proportions are based off of a combination of the TPA per Species of regen in each strata at the time of inventory (derived from inventory data collected) and in cases where the regeneration proportion was not realistic (Bitter Cherry) we utilized values of regeneration advised by NNRG. | | | RainierGateway_Regeneration_Calcs.xlsx |

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| Verifier Issue | Issue ID: | 22-28 | Status: | Closed | Checked by: | EP/BS | Date Identified | 14-Apr-22 |
| ACR Standard, v6.0, Section 4, A.2 | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| ACR Standard, v6.0, Section 4.A.2; IFM Methodology v1.3, B4 | Sections A5,B5, | Non conformance. May impact conformance; no materiality | <p>Section A5.2 of the GHG Plan provides a description of the historical forest management practices in the region that highlights the typical trends (e.g., “...more aggressive management regimes of similar landowners in the region, characterized by shorter, even-aged rotations.”).</p> <p>Verifiers understand the baseline scenario reflects the common practice, which is defined and discussed in Sections B5, C2 and E1 of the GHG plan. In Section B5, the PP describes this scenario as follows:</p> <p>“The baseline scenario represents a mixture of an aggressive harvest regimes and an ecologically minded harvest regime. The NCF portion of the property, being in active forest management, is harvested more aggressively, while the NLT portion of the property represent is represented in the baseline through very light touch harvesting due to restrictions on the property. The project is targeted to maximize net present value at a 4% discount rate for non-governmental organizations. Baseline practices involve clearcuts and intensive ecological management regimes.”</p> | | | RainierGateway_GHGPlan_3_17_22 | | |

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| | | <p>Verifiers find the description of the Common Practice Test in Section C2 of the GHG Plan provides very general details of the common forest management practices that reference such practices as “heavy thinning” and “intensely managed”. While verifiers understand the basic theme of the common practice provided by the PP, the Plan does lack adequate details on the specific common practices. Thus, verifiers are requesting additional description and specificity on the common forest management practices in the region be incorporated into the GHG Plan (e.g., specifics on rotational ages for even-aged harvest practices, thinning treatment types, etc.).</p> <p>The defined common practice should address and/or consider the following: Are there any current examples of what is common practice management in the region that can be provided specific to the forest size & types found on the project area? What information and data are being used as the basis to determine the common practice management in the region? It is not clear if the PP has evaluated the predominate practices in the region/sector to determine the degree in which the practices have penetrated the market to demonstrate the project activities aren’t common practice. Can it be shown that implementation of the project activities and related forest management is not common practice in the region?</p> <p>Also, there are other forest carbon projects being developed/implemented in Western Washington (at least 6 registered/listed in the ACR & CAR registry databases). Additionally, there are numerous conservation easements within Western Washington (e.g., Land Trusts), where common practice may be very similar to the Rainier Gateway project’s forest management for similar private lands and landowners (https://site.tplgis.org/NCED/interactivemap/). There is some evidence that the project’s activities are becoming more of a common practice within the region. Please review and comment.</p> <p>Lastly, verifiers request a summary be added to Section C2 describing the process the PP utilized in determining the proposed project activity exceeds the common practice of similar landowners managing similar forests in the region. If there are associated supporting documentations used for this process, please reference and/or provide.</p> | |
| | | <p><u>August 12, 2022 Findings</u></p> <p>The PP has clarified the process used in determining the common practice applied within the baseline model, which further supports the description in Section C2 of the revised GHG Plan. While some of the information in the PP’s response below has been included in this section, other information has not (e.g., specific input from NNRG). Verifiers request some of this additional information be incorporated into Section C2 to fully describe and justify the process used in defining the common practice.</p> | RainierGateway_GHGPlan_5_26_22 |

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| | | <p>On August 11, 2022, verifiers contacted Jaal Mann, lead forester for Northwest Natural Resource Group (NNRG), to discuss the common practice within the region and forest management practices being utilized within the project area. NNRG provides forest management consulting services to Nisqually Community Forest and Nisqually Land Trust. Based on this conversation and other discussions with regional foresters working along the western slope of the Washington Cascades, verifiers concur with the PP's assessment of common practice. Given the elevation and terrain of the project's forest, verifiers understand the typical industrial model for even-aged forest management is a commercial thinning at 30 years followed by a regeneration harvest (clearcut) at 60 years.</p> <p>The PP has added a reference to Section E within Section C2, where the GHG Plan provides the silvicultural specifications for the harvest treatments incorporated into the baseline model (Table E1-7). Regarding the silvicultural specifications, verifiers request the following clarifications and/or additional descriptions added to the GHG Plan:</p> <p>(1) For the CC (clearcut scenario), the PP notes that at least 3 MBF/ac is needed to implement a treatment. Is this 3 MBF/ac of sawlogs? What is the basis of this value and how was it determined? Please provide supporting evidence to justify this minimum harvest volume per acre.</p> <p>(2) Please add the VTC and VTV scenarios the PP notes the following treatment schedule: “...(1) a precommercial thin, (2) a thin from below, (3) A variable density thin down to 120 ft²/ac, and (4) perpetual variable density thins down to 80 ft²/ac at 20 year intervals.” Verifiers assume step 2 is a commercial thin. Is this correct? If so, what criteria (BA, volume/ac, etc.) are being used to initiate this treatment? If applicable, please include these specifications and/or criteria.</p> <p>(3) If VTC and VTV are the same treatment scenario, what is the purpose for having them both?</p> <p>Verifiers agree with the PP, while there are other carbon projects in the region the total acreage of these projects with similar ownership classes is relatively small; forest carbon projects with management strategies to store more carbon via different harvesting and silvicultural prescriptions is not common practice. Verifiers appreciate the clarification on differences between conservation easements that have various ownership structures and management goals. We concur that having a conservation easement is not an appropriate measure to assess common practice.</p> | |
| | | <u>November 5, 2022 Findings</u> | <i>RainierGateway_GHGPlan_10_7_22</i> |

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| | | <p>In the revised GHG Plan (Section C2), the PP has provided additional descriptions and clarity in defining common practice within the region. Verifiers are satisfied these revisions.</p> <p>Regarding item 1, the PP notes the minimal sawlog volume/ac threshold (3MBF/ac) to initiate a clearcut harvest entry within the baseline model was based on professional judgement from foresters on the project team. As this threshold was part of the optimization model, verifiers understand the model was selecting marginal stands to enter later in the 100-year baseline schedule, which did not reflect realistic practices for these such low volume stands. To reduce this likelihood of harvesting these stands, the PP increased the vol/ac threshold to 5 MBF/ac.</p> <p>Based on our understanding of harvesting practices within the region, verifiers find the revised threshold reasonable, appropriate (realistic practices), and conservative. Verifiers acknowledge this vol/ac threshold change has been included in the revised GHG Plan (Section E1 (table E1-7)).</p> <p>For items 2 & 3, the PP has provided clarity on the VTV and VTC harvest prescriptions; verifiers understand they are duplicates and have now been consolidated into one prescription (VTV). The PP has also clarified that Step 2 of this prescription is a commercial thin (i.e., thin from below down to 180 TPA). An additional operational constraint, for this second entry, is this commercial thinning will only occur if the TPA is greater or equal to 300. Verifiers believe this TPA threshold is reasonable and appropriate. These clarifications have been incorporated in the revised GHG Plan.</p> <p>Verifiers are satisfied with the responses and revisions for these issue items. This issue is considered closed.</p> | |
| OPO/APD Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-May-22 | <p>Detailed descriptions of the common forest management practices in the region as applied in the baseline scenario can be found in section E of the GHG plan (this includes rotation ages, even aged practices, thinning treatments, etc.). Reference to Section E has been added to section C2.</p> <p>Common practice as applied in the baseline scenario to the different ownership classes within the project area are well observed management regimes within the region. The Private Industrial forest management regimes implemented in the baseline scenario can be observed directly adjacent to the project area, and elsewhere in the state at similar and more aggressive levels, on ownership sizes smaller and much larger than the project area. The private non-industrial and non-governmental management regimes implemented in the baseline scenario can be observed elsewhere in the state on similar ownerships. The project landowners, as well as the consulting forest management group on the property, NNRG, who have developed, reviewed, and implemented Timber Harvest Plans (THPs) within the region were</p> | RainierGateway_GHGPlan_5_26_22 | |

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| | <p>consulted and verified that baseline management scenario is consistent with THPs they have reviewed and/or implemented with state approval on similar ownership types, and is common practice in the region in each respective ownership class. The project activity exceeds the observed and verified baseline common practice implemented, and therefor exceeds common practice in the region.</p> <p>Although other carbon projects are being implemented in the region on similar ownerships types, it is only a small fraction of the available land of similar ownership classes that could be entered into carbon projects, and is not common practice. Furthermore, other similar ownerships restricted by conservation easements in the region may be considered similar, but should not be considered the same in terms of common practice, as both the legal restrictions incorporated into the easements, and the management goals of each ownership are unique, and result in different management regimes to meet specific easement restrictions and management goals. The range and intensity of forest management on similar ownership classes in the region is large, and can range from NPV-maximizing management to no-harvesting depending on easement restrictions and management goals.</p> <p>A description of how PP determined project activity exceeds common practice has been added to section C2 of the GHG plan.</p> | |
| 7-Oct-22 | <p>Additional information and clarity has been added to section C2 to describe and justify the process used in defining common practice.</p> <ol style="list-style-type: none"> 1) The 3 MBF/acre entry threshold to implement the CC prescription is for sawlogs. This value was added as a constraint to the FVS projections, and subsequently integrated into the optimization model because in absence, the optimization was choosing marginal stands to enter and clearcut, which was exaggerated in the latter years of the 100-year baseline once higher volume stands were harvested. Although returning a positive NPV, we do not think clearcutting of these marginal stands is realistic. The 3 MBF/acre entry threshold is a mechanism to constrain the model to be more realistic from an operational perspective. The value itself is based off professional judgement from the foresters on our team. For additional conservatism, we have further increased this value to a minimum merchantable harvest of 5 MBF/acre. 2) We agree that the VTV and VTC prescriptions are duplicative and have consolidated them to one prescription – VTV. Correct, Step 2 is a commercial thin. It is a thin from below (THINBTA in FVS) down to 180 TPA. In addition as an additional operational constraint, this 2nd entry is not implemented unless there are a minimum of 300 TPA prior to harvest. 3) See 2). | RainierGateway_GHGPlan_10_7_22 |

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| Verifier Issue | Issue ID: | 22-29 | Status: | Closed | Checked by: | BS | Date Identified | 15-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |

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| ACR Standard, 8.A (item 4) | GHG Plan, Section F1 | Non conformance. <i>May impact conformance; no materiality</i> | <p>In Section F1 of the GHG Plan, the first paragraph the PP lists the ACR's requirements for completing environmental and community impact assessments. Verifiers note a typo in item 5 in this list: "describe how positive impacts contribute to sustainable development goals (optional)". Verifiers understand this ACR Standards' requirement is not optional for the GHG Plan (v6.0, Section 8.A).</p> <p>Additionally, the sustainable development goals for these positive project impacts are not currently identified nor described in this section of the GHG Plan. Verifiers request the removal of the word "optional" and the addition of the sustainable development goals associated with the positive environmental and community impacts.</p> | <i>RainierGateway_GHGPlan_3_17_22</i> |
| | | | <p>August 9, 2022 Findings The PP has updated the GHG Plan to remove the word "optional". This issue item is closed.</p> <p>In this same section of the GHG Plan, pg 46, the PP notes: "Annual attestations confirming this assessment will be provided separately for verification purposes". As the Annual Monitoring Report includes these annual attestations, verifiers question whether this statement is needed. Please clarify.</p> | <i>RainierGateway_GHGPlan_5_26_22</i> <i>DRAFT_RainierGateway_RP1_Monitoring Report_5_26_22</i> |
| | | | <p>November 5, 2022 Findings Verifiers acknowledge an update was made to the GHG Plan, pg 49 that states the Annual attestations are found in the Annual Monitoring report. This issue is closed.</p> | <i>RainierGateway_GHGPlan_10_7_22</i> |
| OPO/APD Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | Descriptions SDGs relevant to the positive impacts of the project activity have been added to section F1. | | | <i>RainierGateway_GHGPlan_5_26_22</i> |
| 7-Oct-22 | The language referenced in the GHG plan has been updated to reference the attestations in the Annual Monitoring Report for Clarity. | | | <i>RainierGateway_GHGPlan_10_7_22</i> |

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| Verifier Issue | Issue ID: | 22-30 | Status: | Closed | Checked by: | BS/EP | Date Identified | 15-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| ACR Standard, 8.A (item 4) | GHG Plan, Section F1 & F2 | Clarification. <i>May impact conformance; no materiality</i> | Section F of the GHG Plan implies, through private forestland ownerships and by project design, it is not a community-based project. Verifiers acknowledge and, based on our understanding, concur with the PP's assessment, however, this section of the GHG Plan does not explicitly describe nor justify whether the project is a community-based project. Please review and include this description and supporting evidence to this section of the GHG Plan. | | | <i>RainierGateway_GHGPlan_3_17_22</i> | | |

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| | | | Also, verifiers request clarifications on the PP's statement in Section F2: <i>".... and adhered to their internally agreed upon practices of project consultation and notification on associated decision making. Nisqually Land Trust, the Project Proponent, will provide references to the publicly available documentation for the project."</i> What does "internally agreed upon practices" and "associated decision making mean"? Is there an internal Board of Directors for NLT that makes these management decisions? How are the NLT and NCF management plans utilized in the decision making process? What are the "references" the PP is referring to? Are these the management plans or something else? Please review and add further descriptions to Section F as appropriate to clarify these questions. | |
| | | | <p>August 12, 2022 Findings</p> <p>The verifiers acknowledge and accept the PP's explanation of the Bluesource – Rainier Gateway IFM project is not a community-based project.</p> <p>The verifiers acknowledge and accept the PP's explanation about the decision-making process within the PP. It is noted that an updated version of the GHG Plan on section F2 was provided in response to finding raised. The Nisqually Land Trust has an internal Board of Directors that guides the direction of the organization through overarching policy, however, management decisions, changes to the management plan, hiring, and other decision making occur at different levels of the organization, so long as they adhere to the overarching policy as defined by the Board of Directors. The Nisqually Community Forest makes all decisions, including management, and changes to the management plan, through their Board of Directors, as there is no staff outside the Board of Directors. Publicly available project documentation can be found on the ACR registry. This issue is now closed.</p> | RainierGateway_GHGPlan_5_26_22 |
| OPO/APD Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | <p>A statement has been added to section F1 stating that, The Bluesource – Rainier Gateway IFM project is not a community based project. The ACR Standard v6.0 does not require justification that a project is not a community-based project, nor does it provide specific criteria to define community-based projects. However, it does reference the definition of community as defined by the CCBA. The Bluesource – Rainier Gateway IFM project does not meet the CCBA definition of a community.</p> <p>Section F2 has been updated to add clarity to the decision-making process within the project proponent.</p> | | | RainierGateway_GHGPlan_5_26_22 |

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| Verifier Issue | Issue ID: | 22-31 | Status: Closed | Checked by: EP | Date Identified 15-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | Comments |

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| ACR Standard, v6.0, Section 8, 8.A | GHG Plan, Sections C.1, F | Non conformance. <i>May impact materiality or conformance.</i> | <p>Section C.1 of the GHG Plan covers the Regulatory Surplus Test and provides a comprehensive list of the applicable laws and regulations. The ACR Standard, Chapter 8 (8.A, item 2) specifies: “<i>Applicable laws, regulations, rules, and procedures and the associated oversight institutions.</i>” Verifiers have the following questions to verify & validate compliance with the ACR Standard for the Environmental and Community Impact assessments:</p> <p>(1) Did the PP consider the applicable laws, regulations, etc in completing these assessments?</p> <p>(2) Are there any oversight institutions that review compliance or monitoring of the environmental and community impacts within the project area?</p> <p>Please add the needed descriptions to the GHG Plan to clarify.</p> | <i>RainierGateway_GHGPlan_3_17_22</i> |
| | | | <p>August 12, 2022 Findings</p> <p>Verifiers acknowledge an updated version of the GHG Plan on section F1 was provided in response to finding raised. All applicable laws, regulations, rules, and procedures as defined in section C1 were considered in this assessment. Oversight institutions such as the Washington State DNR, Washington Department of Ecology, and the Environmental Protection Agency were considered in this assessment. All applicable laws, regulations, rules and procedures enforced by the oversight intuitions are addressed in the project scenario and have no negative community and environmental impact. This issue is now closed.</p> | <i>RainierGateway_GHGPlan_5_26_22</i> |
| OPO/APD Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 22-May-22 | Descriptions have been added to the GHG plan in Section F1 to clarify. | | | <i>RainierGateway_GHGPlan_5_26_22</i> |

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| Verifier Issue | Issue ID: | 22-32 | Status: | Closed | Checked by: | BS | Date Identified | 15-Apr-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| ACR Standard, v6.0 | GHG Plan | New information request. | Verifiers conducted a conference call with staff and consultants on April 8, 2022 to discuss a variety of topics including such items as management history, land use, common practice in the region, forest management plan development, long term monitoring, project accounting, and contractor/consultant roles and responsibilities. Individuals of the meeting included Jeanette Dorner (executive director of the Nisqually Land Trust), Jason Hall (executive director of the Nisqually River | | | <i>RainierGateway_GHGPlan_3_17_22</i> <i>Management plans for NLT and NCF.</i> | | |

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| | | Foundation), and Joe Kane (consultant to NFT, former executive director of the Nisqually Land Trust and former member of the Board). | |
| | | During this call verifiers had requested the contact information of the contracting forester for NLT. | |
| | | April 16, 2022 Findings On April 16, Jason Hall provided this information. This issue is now closed. | |
| OPO/APD Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 16-Apr-22 | e-mail from Justin Hall: You can reach Jaal Mann via email at jaal@nnrg.org | | |

| Verifier Issue | Issue ID: | 22-33 | Status: | Closed | Checked by: | BS | Date Identified | 12-Aug-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |
| ACR IFM v1.3; tree definition | Inventory tree list and RP_CO2 calcs workbook | Clarification. May impact materiality or conformance. | Verifiers note that vine maple is listed in the Inventory Master workbook (128 listings). In the tree list and carbon calc tabs within RP CO2 workbook, vine maple is not listed, yet the total tree list count is the same (4712). We have the following questions and/or requests: (1) Based on comparing plot & tree numbers, verifiers find the vine maple records in the Inventory Master appear to have been switched to bitter cherry in the RP_CO2 workbook. Verifiers are not aware of any project documents that explain this change. Please clarify. (2) Based on our professional experiences and discussions with other foresters that work in the region, at similar elevations and forest conditions as the project area, vine maple is considered a shrub. If it was utilized in estimating the project stocks, please provide supporting documentation to justify as a tree or remove from the tree list. | | | | RainierGateway_Inventory_Master_5_3_22 RainierGateway_Start_RP_CO2_05_05_2022 | |
| | | | November 2, 2022 Findings Verifier confirmed that 128 vine maple stems have been removed from tree list within the RP_CO2 workbook and excluded from the estimate of the total project stocks. The issue remains open as these vine maple stems still remain in the Inventory Master data. For long term monitoring clarity and transparency, document consistency and subsequent desk review verifications, verifiers request the vine | | | | RainierGateway_Inventory_Master_5_3_22 RainierGateway_Start_RP_CO2_10_06_2022 | |

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| | | | maple stems be removed from the Inventory Master or notes added that they are not included in calculating plot carbon. | |
| | | | <u>November 30, 2022 Findings</u> The PP has removed the 128 vine maple stems in the revised Inventory Master file to reflect the same inventory treelist in the RP_CO2 workbook. As these two treelists' files are now consistently reported, this issue is closed. | RainierGateway_Inventory_Master_8_30_22 RainierGateway_Start_RP_CO2_11_28_2022 |

OPO/APD Response

| Date | PP Comment | Additional evidence submitted for review by PP |
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| 30-Aug-22 | The 128 records of vine maple have been removed from the inventory and associated calculations. They were incorrectly referenced in the calculations as bitter cherry. | |
| 22-Nov-22 | An updated Inventory Master File has been added that matches the most updated RP_CO2 workbook treelist. | RainierGateway_Inventory_Master_8_30_22 |

| Verifier Issue | Issue ID: | 22-34 | Status: | Closed | Checked by: | BS | Date Identified | 10-Aug-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| ACR VV Standard v1.1, Section 1.B | GHG Plan, Section D2 | New information request. May impact materiality or conformance. | Verifiers would like to conduct interviews with those conducting QA/QC desk reviews of the project documents as specified in Section D2 of the GHG Plan. Please provide the names and contact information for those conducting the reviews: independent forester review, technical review, and senior management review. | | | RainierGateway_GHGPlan_5_26_22 | | |
| | | | <u>August 29, 2022 Findings</u> The PP has provided the requested QA/QC contacts. This issue is closed. | | | | | |

OPO/APD Response

| Date | PP Comment | Additional evidence submitted for review by PP |
|-----------|---|--|
| 19-Aug-22 | Contacts for QA/QC desk reviews were provided to verifiers over email. Please see also see contacts below: Independent Forrester Review Aaron Wykhuis, CF MANAGER - FOREST CARBON PROJECTS m. 970-420-8653 awykhuis@anewclimate.com Technical Review Ben Parkhurst VP - Technical Development - Natural Climate Solutions | |

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| <p>T 415.399.1794 C 307.760.6569</p> <p><i>AND/OR (Depending on Technical Lead)</i></p> <p>Josh Clark, PhD, CF Director – Forest Carbon Modeling m. 936-414-1454 jclark@anewclimate.com</p> <p>Senior Management Review Liz Lott Vice President- Natural Climate Solutions T 415.434.4165 C 404.543.0306</p> <p><i>AND/OR (Depending on Project Lead)</i></p> <p>Ian Hash (He/His/They) Director of Natural Climate Solutions - Forest Carbon m. 628.399.1427</p> | |
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| Verifier Issue | Issue ID: | 22-35 | Status: Closed | Checked by: BS | Date Identified | 10-Aug-22 |
|-------------------------|--|---|--|----------------|--|---------------------------------------|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments |
| ACR Standard Section B8 | GHG Plan, B8 | New information request. <i>May impact materiality or conformance.</i> | In Section B8 of the GHG Plan the PP utilized the ACR Tool for Risk Analysis and Buffer Determination to assess risk. In the Management and Governance of Section 1, item D, Conservation Easement Deduction the PP utilizes a proportion of the project area in a conservation easement to calculate the deduction. Verifiers request the supporting input of this calculation so we can verify that it was accurately determined. Please include this information within this section of the GHG Plan. | | | <i>RainierGateway_GHGPlan_5_26_22</i> |
| | | | <u>November 6, 2022 Finding</u> The PP has provided the requested supporting inputs and formula used to calculate the risk rating deduction for a conservation easement within a portion of the project area. Verifiers reviewed this category risk rating calculation and information provided in the revised GHG plan (Section B8) and concur with the approach used and the overall risk rating (17.11%). This issue is closed. | | | <i>RainierGateway_GHGPlan_10_7_22</i> |
| OPO/APD Response | | | | | | |
| Date | PP Comment | | | | Additional evidence submitted for review by PP | |
| 19-Aug-22 | The formula for the risk calculation and the actual calculation have been added to the GHG plan. The calculation worksheet used to determine the value has also been added to the verification folder. | | | | | |

| Verifier Issue | | Issue ID: | 22-36 | Status: | Closed | Checked by: | BS | Date Identified | 8-Nov-22 |
|------------------|--|---|---|---------|--------|--|----|---|----------|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | | Comments | |
| | Monitoring Report | Possible non conformance. <i>May impact conformance; no materiality issue</i> | Verifiers understand the ACR Standard listed in the Monitoring Report (Section 2, line 9) needs to reflect the latest version of the ACR Standard. This is based on recent ACR guidance (W.Reed; Sept 22, 2022), which is pasted below: “Projects are subject to eligibility rules of the standard version they list under, but everything else is subject to latest version. To reiterate, projects are always subject to the latest version of the ACR Standard (7.0 currently). This differs from the methodology version. Methodology versions (for example, IFM v1.3 vs newly updated IFM v2.0) are locked in at the time of Validation.” Please review and update the Monitoring Report as appropriate. | | | | | DRAFT_RainierGateway_RP1_Monitoring Report_10_7_22 | |
| | | | <u>November 30, 2022 Finding</u> The PP has updated the ACR Standard in the revised Monitoring Report (Section 2 Line 9) to reflect the most current Standard (v7.0). This issue is closed. | | | | | DRAFT_RainierGateway_RP1_Monitoring Report_11_29_22 | |
| PP Response | | | | | | | | | |
| Date | PP Comment | | | | | Additional evidence submitted for review by PP | | | |
| 22-Nov-22 | Section 2 Line 9 of the Monitoring Report has been updated to “ACR Standard Version 7.0” | | | | | DRAFT_RainierGateway_RP1_MonitoringReport_11_29_22 | | | |

| Verifier Issue | | Issue ID: | 22-37 | Status: | Closed | Checked by: | BS | Date Identified | 8-Nov-22 |
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| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | | |
| ACR Standard; 6.E | Monitoring Report | Non conformance. <i>May impact conformance; no materiality issue</i> | <p>Please confirm and add a brief description in the appropriate section of the Monitoring Report confirming (1) the continuation of the project activities and (2) the ownership remains clear and uncontested (to comply with Section 6.E of the Standard regarding attestations).</p> | | | DRAFT_RainierGateway_RP1_Monitoring Report_10_7_22 | | | |

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| | | <p>November 30, 2022 Finding</p> <p>The PP has added a brief statement to the revised Monitoring Report (Section III.1) to confirm the continuation of the project activities and the ownership remains clear and uncontested to comply with section 6.E. of the standard. Verifiers are satisfied with this revision and this issue is now closed.</p> | <p><i>DRAFT_RainierGateway_RP1_MonitoringReport_11_29_22</i></p> |
| PP Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 22-Nov-22 | <p>Language has been added to section III.1 of the Monitoring Report to confirm the continuation of the project activities and the ownership remains clear and uncontested to comply with section 6.E. of the standard. The following language has been added:</p> <p>“Anew – Rainier Gateway IFM Project confirms the continuation of all project activities. The Nisqually Land Trust holds, free of any lien, charge, security interest or other encumbrance, legal title to and all ownership rights to any removal, limitation, reduction, avoidance, sequestration, or mitigation of any greenhouse gas associated with the project.”</p> | <p><i>DRAFT_RainierGateway_RP1_MonitoringReport_11_28_22</i></p> | |

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| Verifier Issue | Issue ID: | 22-38 | Status: | Closed | Checked by: | BS | Date Identified | 10-Nov-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| Validation & Verification Standard (Sections 8 & 9) | GHG Plan E1 and Project spatial data | Clarification. <i>May impact materiality or conformance.</i> | <p>Verifiers prepared a Sampling Plan and conducted a site visit in September 2021. Verifiers’ sampling strategy was based on the plot carbon values (Start RP CO2 workbook_09_15_2021) and spatial data provided prior to the site visit (strata acreages and plot assignments; Aug & Sept 2021).</p> <p>In the PP’s March 17, 2022 project document submittal, the PP provided the updated GHG Plan and Monitoring Report (these were partially completed prior to the site visit). Also provided was the revised spatial data (3/16/22). While the project boundaries stayed the same since the site visit, the strata acreages and plot-strata assignments changed (same total plots but with different strata assignments). This stratification change does not appear to be based on a response to an Issues Log finding. Verifiers are seeking clarification on why the stratification changed (namely the ISM stratum) and are additionally assessing potential implications, if any, on the results of the September 2021 site visit sampling (t-test). Please explain why the stratification acreages changed after the site visit.</p> <p>Lastly, verifiers note the project area has also increased by 13.4 acres. Please explain why the stratification and project area have been changed since the site visit.</p> | | | <p><i>RainierGateway_invStrata_8_25_21.shp</i> <i>RainierGateway_Plots_8_25_21_1.shp</i></p> <p><i>RainierGateway_Strata_3_16_22.shp</i> <i>RainierGateway_Plots_3_16_22.shp</i></p> <p><i>RainierGateway_CarbonPlotMethodology_10_3_22</i> <i>RainierGateway_GHGPlan_10_7_22</i> <i>RainierGateway_Start_RP_CO2_09_15_2021</i> <i>RainierGateway_RP1_MonitoringReport_3_17_22</i></p> | | |

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| | | <p><u>November 30, 2022 Finding</u></p> <p>The PP have provided the requested clarifications regarding the changes in project area (13.4-acre increase) and strata acreages. Verifiers understand the project area increase is due to a post inventory refinement of the extent of a permanent hazard (cliffs); prior to the site visit the PP had conservatively removed a larger area around these cliffs. Verifiers have reviewed aerial imagery and topography in and around this hazard and concur with the PP's assessment and change to the project area.</p> <p>For the strata acreage changes, verifiers understand the PP had incorrectly delineated the RMZ stream buffers and associated mapped strata prior to the Sept 2021 site visit. In March 2022, the PP had corrected the RMZ buffers to comply with Washington Forest Practice Rules. This remapping of the RMZ buffers resulted in an increase in the ISM stratum (Inner Zone) and a decrease in the MGA stratum (Outer Zone). These RMZ changes along with the refinement of the hazard excluded area changed the strata acreages and the associated plot assignments. Verifiers are satisfied with these clarifications and find the revised strata and hazard excluded area to be reasonable, accurate and compliant with the IFM Methodology (legal constraints). Also, as the PP notes, the expansion of the ISM stratum increased harvest restrictions, which has made the baseline model more conservative. This issue is considered closed.</p> <p>Please note, for the Sept 2021 site visit sampling, verifiers' sampling strategy was based on the initial strata characteristics & carbon stocks and associated risks (min of 11 plots sampled; CSM:1; ISM:2; MGA: 5; and MGB: 3). The minimum 11 plots sampled during the site visit passed the t-test; the inventory data was statistically sound ($p=0.70$, $p>0.1$).</p> <p>With the revised strata-plot assignments, four of the eleven plots sampled during the site visit changed strata (from MGA to ISM), which resulted in the following sampling sequence: CSM:1; ISM:6; MGA: 1; and MGB: 3. Plot carbon values also changed slightly due to other issues noted in this Issues Log. Based on these changes, verifiers re-ran the t-test with these revised plot carbon values and found the inventory data was still statistically sound ($p=0.63$, $p>0.1$).</p> <p>The revised sampling sequence is different than what verifiers would have sampled during the site visit given the revised plot-strata assignments and associated risks (CSM:1; ISM:3; MGA: 4; and MGB: 3). Verifiers assessed whether another site visit was needed to implement a revised sampling strategy.</p> <p>Upon review, verifiers are reasonably assured the revised sampling t-test results are still reflective of the PP's methods in collecting and processing inventory data in estimating the project stocks as the strata are based on ownership and legal</p> | <p><i>S&A e-mail from ACR (W.Reed):</i> <i>E-mail_ACR_SV_re-sampling_17Nov2022</i></p> |
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| | | <p>constraints (riparian buffers) rather than higher risk components such as stocking & terrain/access differences. Based on the stratum types, terrain, sampling results and stakeholder interviews with the inventory contractor, verifiers believe additional re-sampling is not warranted (i.e., returning to the site to collect additional samples in the MGA strata). The t-test results are still applicable and the overall risk of materiality is LOW.</p> <p>An e-mail was sent to ACR on 11/15/2022 to review this assessment and findings. ACR reviewed and concurred that another site visit is not required (see E-mail ACR_17Nov2022).</p> | |
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PP Response

| Date | PP Comment | Additional evidence submitted for review by PP |
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| 22-Nov-22 | <p>The increase in project area by 13.4 acres is due to the exclusion of the hazardous area around plot 76. Plot 76 could not be accessed by the inventory crew and was removed due to permanent hazards (cliffs). Prior to the site visit the plot's representative acres (selected using the plot's original grid square from the fishnet tool used to allocate plots/locations) were conservatively removed from the project area. After the site visit, we refined our hazard removal by identifying the hazardous area around plot 76 more accurately and removing it. To update this, we utilized imagery, DEMs/slope models, and some anecdotal information from the inventory crew to delineate and remove the cliff area around plot 76 from the project area. This resulted in less total hazardous acres surrounding plot 76, and an overall increase in 13.4 acres between the two versions of the spatial layers.</p> <p>The Stratification delineation was updated on 3/16/22 due to incorrect silviculture being implemented in the RMZ buffers. This was evident across the entire property where the Outer Zone, as defined in WAC 222, was being merged in with the MGA Strata. This was not the intention, as silviculture was being applied in the MGA Strata that should not be applied in RMZ areas. To correct this, the Outer Zone was clipped out of the MGA strata and merged into the ISM Strata resulting in a net changed of +716.98, - 713.77, and +10.21 acres in the ISM, MGA, and MGB strata respectively (This in conjunction with the hazardous area removal adjustment described above account for the net changes in acres across strata and project). These changes to the strata/acreage allocations have resulted in a more conservative baseline scenario as all Outer Zone acres have been added to the Inner Zone/ISM strata, which has more restrictive silviculture that is tailored to inner zone management, than what could be applied in the outer zone.</p> | N/A |

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| Verifier Issue | Issue ID: | 22-39 | Status: | Closed | Checked by: | BS/EM | Date Identified | 11-Nov-22 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |

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| ACR IFM v1.3 | RP_CO2 calcs workbook | Clarification. <i>No impact on materiality or conformance</i> | Verifiers compared individual tree growth between received treelist datasets to confirm the plot carbon values for the revised plot-strata assignments (issue 22-38) and the vine maple/other species removal (issue 22-33). Verifiers noticed growth increments in the IndTreeGrow tab fluctuated between datasets we have received (inventory measurements stayed the same). For example, Tree 33 in Plot 3: RainierGateway_Start_RP_CO2_09_15_2021.DBH Grown by 1 FVS Cycle: 24.98" RainierGateway_Start_RP_CO2_05_05_2022.DBH Grown by 1 FVS Cycle: 25.01" RainierGateway_Start_RP_CO2_10_06_2022.DBH Grown by 1 FVS Cycle: 25.31") Height grown by 1 FVS cycle fluctuates similarly. Please clarify why this is occurring. | RainierGateway_Start_RP_CO2_09_15_2021.xlsx RainierGateway_Start_RP_CO2_05_05_2022.xlsx RainierGateway_Start_RP_CO2_10_06_2022.xlsx |
| | | | November 29, 2022 Finding The PP has clarified the slight changes in diameter measurement within the FVS treelist are likely the result of trees being removed from the tree list (Issue 22-33), which decreased stand basal area and slightly increased growth of the residual trees. Slight changes in these measurements may also have resulted when the PP updated the FVS variant version during the verification process. Verifiers are satisfied with these explanations and find such slight changes as relatively insignificant in estimating the project stocks. This issue is considered closed. | |
| PP Response | | | | |
| Date | PP Comment | | | Additional evidence submitted for review by PP |
| 11-Nov-22 | Please note that during the change from the 05_05 version to the 10_06 version 5 tree records from the 05_05 version were dropped for plot 3 in the 10_06 version, as part of the species removal mentioned (issue 22-33). This removal of trees like vine maple slightly decreased the stand basal area, and slightly increased the growth of remaining trees in the plot. For example, tree 33 in plot 3 (mentioned above) changed its annual growth rate (column J in IndTreeGrow tab) from ~0.10 in/yr to ~0.13 in/yr, leading to an estimated DBH that is (0.13-0.10)*10 years = 0.30" DBH larger after 10 years. For the change in growth rates between 09_15_21 and 05_05_22 versions, we are not as certain for the very small change in DBH growth (0.03/10) = 0.003 in/yr difference in growth. We updated the FVS variant version between 09_15_21 and 05_05_22, which is one possible cause. | | | N/A |

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| Verifier Issue | Issue ID: | 22-40 | Status: | Closed | Checked by: | BS | Date Identified | 27-Feb-23 |
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | Comments | | |
| | GHG Plan; Workbook s, Inventory Method | Clarification. <i>May impact materiality or conformance.</i> | Based on ACR's 2/23/23 review comments and subsequent Anew responses and revisions to the project documents, verifiers note potential discrepancies and/or typos in the GHG Plan and supporting project documents, which are listed below. Please review, clarify and/or revise as appropriate. | | | RainierGateway_GHGPlan_2_23_23 RainierGateway_CarbonPlotMethodology_10_3_22 | | |

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| | | <p>(1) Supporting project documents include references to the previous project area (3,328 acres) including:</p> <ul style="list-style-type: none"> RainierGateway_Start_RP_CO2 (Cell R2 in Stats_StartDate, Stats_RPDate) RainierGateway_RP_ERT_HWP (Financial Barriers Test Discounted) 16. RainierGateway_CarbonPlotMethodology (Total Acres and Stratification Table need to be updated) <p>(2) GHG Plan (Sections E4 & E5)</p> <p>17. The Uncertainty and Leakage calculations use the word “Sample” to describe them. As these values reflect the actual values, for clarity, verifiers request the reference to “Sample” be removed.</p> | <p><i>RainierGateway_RP_ERT_HWP_2_20_23.xlsx</i></p> <p><i>RainierGateway_SV_CO2_10_06_2022.xlsx</i></p> <p><i>ACR576_Rainier Gateway_RP1_ACR_Review_v1 0_AnewResponses_2_23_23</i></p> |
| | | <p>March 1, 2023 Finding</p> <p>(1) Verifiers confirmed the correct project areas have been updated within the revised project documents (i.e., Start_RP_CO2; RP_ERT_HWP, and Carbon Plot Methodology). Verifiers concur with the APD that the update in the Start_RP_CO2 workbook does not affect downstream project stock calculations. We also agree the NPV assessment used for the Financial Barriers test did increase by ~\$200 and did not affect the outcome of this test assessment.</p> <p>(2) The APD has removed “Sample” references in the noted sections in the revised GHG Plan.</p> <p>All requested corrections and edits have been completed; this issue is closed.</p> | <p><i>RainierGateway_RP_ERT_HWP_2_28_23</i></p> <p><i>RainierGateway_SV_CO2_2_28_2023</i></p> <p><i>RainierGateway_CarbonPlotMethodology_2_28_23</i></p> <p><i>RainierGateway_GHGPlan_2_28_23</i></p> |
| PP Response | | | |
| Date | PP Comment | Additional evidence submitted for review by PP | |
| 28-Feb-23 | <p>(1) Updated supporting documents sent to ACR have now been provided.</p> <ul style="list-style-type: none"> Start_RP_CO2 cells have been updated – downstream cells were not affected, it does not affect crediting. (Calculations/RainierGateway_Start_RP_CO2_2_28_23.xlsx) Financial Barriers Test row 23 has been updated, NPV increased by ~\$200. (Calculations/RainierGateway_RP_ERT_HWP_2_28_23.xlsx) Carbon Plot Methodology has been updated to include the updated total and strata acres. (InventoryMeth/RainierGateway_CarbonPlotMethodology_2_28_23.pdf) <p>(2) The “Sample” references were removed, and an updated GHG plan was uploaded to the verification folder. (ReportingForms/RainierGateway_GHGPlan_2_28_23.pdf)</p> | | |

| Verifier Issue | Issue ID: | 22-41 | Status: | Closed | Checked by: | BS/EM | Date Identified | 27-Feb-23 |
|--------------------------|------------------------|---|--|--------|--|-------|--|-----------|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | Comments | |
| ACR IFM v1.3, Section C1 | ERT workbook, GHG Plan | Clarification. May impact materiality or conformance. | <p>Based on ACR’s 2/23/23 review comments and subsequent Anew responses and revisions to the project documents, verifiers understand the project area was reduced from approximately 3,328 to 3,326 acres [1.8 acre overlap with abutting Forest Carbon project (Ashford -CAFR5095/CAR1094), ACR comment #3]. As a result of this change the project’s ERTs increased by 313 tCO2e (w/o buffer deduction).</p> <p>With the reduction in the project area, verifiers would expect the ERT’s to decrease. We are trying to understand why this occurred given no changes in the plots occurred. Even if the baseline was re-optimized, verifiers would not expect the ERTs to change by this much. Please explain.</p> | | | | <p>RainierGateway_RP_ERT_HWP_2_20_23.xlsx</p> <p>RainierGateway_GHGPlan_2_23_23</p> <p>ACR576_Rainier Gateway_RP1_ACR_Review_v1 0_AnewResponses_2_23_23</p> | |
| | | | <p>March 6, 2023 Finding</p> <p>Verifiers have reviewed the revised project documents and have been able to confirm the allocation of acres in the 100-year calcs workbook aligns with the values from the optimization. Verifiers have confirmed the calculated values based on these allocation changes and are satisfied with the changes in the baseline.</p> <p>During the review of the changes in the baseline verifiers did however note an error in 100-year calcs workbook that requires clarification and/or revision. There are several plot/treatment combinations in the “FVSPivot_baseharv” tab that have blank values for both "CO2_TOTAL" and "CO2_SAW" in years where the “MCUFT” and “VOLCFSND” columns indicate that trees were harvested. While the majority of the plot/treatment combinations with this error are not actually utilized in the baseline optimization, the VTV_2020 prescription for plot 37 appears to have this error and is used in the baseline. Please clarify why the “CO2_TOTAL" and "CO2_SAW" columns are blank in years where harvesting has occurred and revise the baseline calculations as necessary.</p> | | | | <p>RainierGateway_100Yr_calcs_2_20_23</p> <p>optimizationCheck_02_28_23</p> | |
| | | | <p>March 8, 2023 Finding</p> <p>Verifiers understand the noted blanks in the previous 100-year calcs workbook were due to FIA coding error for rocky mountain maple. This has been corrected in the revised 100-yr workbook, which resulted in slight changes in the 20-year avg baseline and associated ERTS. These changes have been updated in the revised ERT workbook, GHG Plan and Monitoring Report. Verifiers are satisfied with the explanation and concur with the updates completed in the revised project documents; this issue is now closed.</p> | | | | <p>RainierGateway_RP_ERT_HWP_3_6_23.xls</p> <p>RainierGateway_100Yr_calcs_3_6_23.xls</p> <p>RainierGateway_GHGPlan_3_6_23.pdf</p> <p>DRAFT_Rainier_RP1_MonitoringReport_3_6_23.pdf</p> | |
| PP Response | | | | | | | | |
| Date | PP Comment | | | | Additional evidence submitted for review by PP | | | |

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| 28-Feb-23 | <p>Upon close comparison of the 2 runs, Plots 19 and 37 originally were incorrectly assigned to the “GROW” prescription in the Baseline_Summary tab of the 100 year calcs workbook, even though the optimization assigned Plot 19 to VTV_2020 and Plot 37 to VTV_2025. This was due to a manual transcription error in the October 2022 version. By correctly transcribing these plots to the prescriptions they should have been assigned to in the Baseline_Summary tab, this means that the baseline scenario now correctly shows slightly lower stocking than before. This slightly lower stocking in the baseline scenario leads to slightly higher crediting.</p> <p>In order to fully validate that the R optimization outputs match the Excel baseline allocations exactly, an additional file (Calcs/optimizationCheck_02_28_23.xlsx) was provided. This file compares the R optimization values (left columns) with the 100 year calcs (Baseline Summary Column G) values (center columns), then compares the values in the far right columns, to confirm that the R optimization values were correctly transcribed to Excel. This file shows that 2822 rows “Match”, and 0 rows are “No Match”, meaning that all rows match between the R optimization acres allocation, and the Excel acres allocation.</p> | |
| 6-Mar-23 | Plots 19 and 37(and 40) are the only plots with Rocky Mountain Maple. FVS took the FIA code input (321), and outputs 999. This caused an issue where blanks were output in the FVS tabs for those plots for some years. This has been repaired. GHG plan has been updated, as well as the 100 year calcs and ERT calcs workbooks. | RainierGateway_RP_ERT_HWP_3_6_23.xls RainierGateway_100Yr_calcs_3_6_23.xls RainierGateway_GHGPlan_3_6_23.pdf DRAFT_Rainier_RP1_MonitoringReport_3_6_23.pdf |

| Verifier Issue | Issue ID: | 22-42 | Status: | Closed | Checked by: | BS | Date Identified | 7-Dec-22 |
|------------------|------------------|---|--|--------|-------------|--|-----------------|----------|
| ACR Standard ref | GHG Plan Section | Significance | Issue Description | | | | | Comments |
| | | Observation. <i>May impact conformance; no materiality issue</i> | Verifiers note the project name is currently undergoing a change. On December 6, 2022, the PP has submitted the required forms to ACR to change the project name from “Bluesource-Rainier Gateway Improved Forest Management Project” to “Anew-Rainier Gateway Forestry Project”. All project and verification/validation documents have been updated to reflect this upcoming change. | | | | | |
| PP Response | | | | | | | | |
| Date | PP Comment | | | | | Additional evidence submitted for review by PP | | |
| 8-Dec-22 | N/A | | | | | | | |

Appendix C: Project Team

| Verification Team | Qualifications |
|-------------------|--|
| Robert Turner | <p>Robert Turner holds a BS in finance and a MS in forest management. He brings over 25 years of experience in forest management consulting, primarily in the northeastern US. This experience spans a broad range of technical and analytical services, often related to forest inventory and management planning, mensuration, growth and yield modeling, financial modeling, information and decision support systems, and spatial analysis. His expertise in long-term timber supply modeling has supported state and regional forest policy in all the states of the Northern Forest. Robert gained accreditation (expired) as a lead verifier by ARB and CAR under their Forest and Urban Forest protocols and has been a verifier/biometrician on sixteen forest carbon projects under CAR, ARB & VCS standards.</p> <p>Robert joined S&A Carbon in June of 2015. As a Senior Auditor, he is responsible for leading assessments of GHG projects under various carbon offset standards, including the California Air Resources Board.</p> |
| Bill Stack | <p>Bill Stack is a forester, natural resource manager, and ecosystem restoration specialist with over 29 years experience working on forest and aquatic ecosystems in the northeast and northwest US. He holds a master's degree in Forest Engineering from Oregon State University. He is an ARB accredited lead verifier and forest project specialist. Bill has participated on the verification of forest offset projects throughout the US including Alaska. Verification responsibilities included pre-site visit prep, forest inventory, data processing and analysis, developing findings, and report writing. Bill also provides a broad range of forest management consultation services to private landowners owners in preparing and implementing ecologically-based forest stewardship plans. He holds professional forester licenses in New Hampshire and Vermont. His comprehensive approach balances water, soil, wildlife, timber, recreation, aesthetics, and other resources with landowner goals and values. Previously, Bill has worked as a Senior Project Scientist with Stantec consulting on ecosystem restoration projects and as a Forest Hydrologist on interdisciplinary project teams for the USDA Forest Service.</p> |
| Lawson Henderson | <p>Lawson joined S&A Carbon as a Senior Associate in 2016, and expands the existing capacity of the forest carbon offset verification team. He is acts as an ARB Verifier on forest carbon offset projects, and is qualified as a Lead Offset Verifier under the ARB regulation. Lawson currently supports the S&A team with reviews of verification documents, field verifications of ARB forest carbon offset projects, and S&A's actions to become accredited under the American National Standards Institute – ANSI). Lawson brings nearly a decade of experience in forest certification through his prior employment with Rainforest Alliance, where he acted</p> |



| Verification Team | Qualifications |
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| | as a project manager and lead auditor of forest carbon offset projects against the major voluntary GHG programs, and FSC Forest Management & Chain of Custody Certifications. Lawson is qualified as a Lead Verifier under the Climate Action Reserve (CAR), and is also qualified as a AFOLU IFM Expert under the Verified Carbon Standard (VCS) program. He has led the validation and verification of IFM, AR & REDD forest carbon offset projects against the major voluntary GHG programs globally. He is a member of both the Gold Standard Foundation (GSF) Land Use and Forestry (LUF) and Oversight and Assurance (OA) Technical Advisory Committees (TAC). Lawson holds a B.S.F in forest management from the University of New Hampshire (2005). |
| Pablo Reed | Pablo Reed holds a B.S. in Forest and Ecological Engineering as well as a minor in Latin American Studies from the University of Washington in Seattle. He has also recently completed a Masters of Environmental Management degree at the Yale School of Forestry & Environmental Studies. Prior to his return to grad school, he spent the preceding six years of his life working with conservation and development projects in various countries in Latin America. He served as country director for a joint USAID/Idaho State University community conservation project in the Alta Verapaz region of Guatemala and also spent time in Panama working as an environmental and GIS consultant. His most recently worked for the Peace Corps in Ecuador, where he served as program manager for the posts' natural resource conservation program. While at Yale, his program of studies centered on social and political ecology as well as natural resource management policy. His research and subsequent thesis centered on the development of REDD (Reducing Emissions from Deforestation and Degradation) policy frameworks, especially as they pertain to the inclusion of communal Indigenous territories and lands (Ecuador, summer 2010). Pablo is an ARB Forestry project specialist, and an ARB Lead Verifier. |
| Elizabeth McGarrigle | Elizabeth McGarrigle holds three forestry degrees (BScF, MScF, PhD). Her work has focused on forest inventory, growth and yield, and forest management planning. Her research focused on examining the impact of uncertainties in the inputs to long term forest management plans when optimization models are employed during the Master's program. While completing her PhD, she was part of the team developing a regional growth and yield model for the Acadian forest in the Northeastern United States and Canada. She developed a stand level model that is used to predict survivor growth, ingrowth, and mortality in the region. As part of her dissertation, she focused on several variants of the Forest Vegetation Simulator and several regional growth and yield models from across Canada and the United States. Dr. McGarrigle is currently working with the provincial government in Nova Scotia Canada as a Forest Inventory Data Analyst where she is responsible for the design and analyses of |

| Verification Team | Qualifications |
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| | <p>permanent sample plots. In addition to her work as a biometrician on several ARB forest projects, she has also been involved in research at Natural Resources Canada using a fine scale forestry model to assess the impact of climate change on species composition in forest types across Canada.</p> |
| <p>Eduardo Paixão</p> | <p>Carlos Eduardo Paixão joined S&A Carbon as a subcontractor in 2021 and expanded the existing capacity of the forest carbon offset verification team. Eduardo currently supports the S&A team as a lead verifier with reviews of verification documents and field verification of forest carbon offset projects. Eduardo holds a bachelor's degree in forestry and in wood engineering, and a master's in forestry. He has 7 years of experience in natural resources management. He has conducted assessments of deforestation in supply chains in South America, Africa, and in Indonesia. Previously, he participated in the development of technical and economic studies for two European forestry investment funds in Latin America. Eduardo is a sustainable forestry and agriculture standard auditor and has conducted audits worldwide (FSC, PEFC, RSPO sustainable palm oil, sustainable farm assessment, Rainforest Alliance, UTZ coffee and cocoa, and the international sustainability carbon certification). Eduardo is also involved in academic research and has been a lecturer at the University of Quebec in Canada since 2018. Native Portuguese speaker, he also speaks French and English.</p> |
| <p>Alexa Kandarís</p> | <p>Alexa Kandarís has 6 years' experience in carbon auditing and climate change mitigation policy and is accredited by ARB as a lead verifier under their US Forests protocol and the Ozone Depleting Substances protocol, and by the Climate Action Reserve (CAR) as a lead verifier. In this time, she has participated in verifications of carbon offset projects and corporate inventories under a variety of GHG programs, including the Air Resources Board, Climate Action Reserve, American Carbon Registry, Verified Carbon Standard/Climate Community & Biodiversity Standard, and Carbon Disclosure Project. Alexa developed tracking systems for a program registered under the Clean Development Mechanism and registered with the Gold Standard. Alexa is currently responsible for implementation of S&A's corporate management system to ensure ongoing improvement and compliance with ISO requirements. In addition to this, she has field experience with Forestry, Ozone Depleting Substances, and Livestock verification projects. She holds a Bachelor of Arts in Economics with a focus on natural resource and environmental Economics.</p> |
| <p>Beth Daut</p> | <p>Beth Daut has over 30 years of experience working with private, investment and industrial landowners in Maine, New Hampshire, Vermont, and the Adirondack region of New York. Beth has an A.A.S. degree in Forest Technology from the SUNY College of Environmental Science and Forestry Ranger School and a Bachelor's degree in</p> |

| Verification Team | Qualifications |
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| | Environmental Science from SUNY Plattsburgh. She is licensed in the states of Vermont and New Hampshire, and a member of Society of American Foresters. Civically, she is a member of the Berlin Conservation Commission and Tree Warden for the town of Berlin. |
| Alex Powell | Alex Powell has a BS degree from Humboldt State University, 2006, majoring in Wildlife Management. He has been employed in the forestry business since 2008, and has worked with Blair Forestry Consulting since 2014. He has experience with inventory data collection. He is experienced with all equipment necessary for cruising (releskop, impulse laser for heights and distances, spencer tape, biltmore stick, etc.) as well as species identification, and keeps field notes and data organized. He has collected data on field sheets and handheld devices, and has organized and interpreted data in the office. Additional experience is described below. Timber Harvest Plan preparation, filing and implementation (field work and written document, Pre-harvest Inspections, LTO interactions); Interpretation and implementation of the Forest Practice Rules; Watercourse classification; Identification of fish bearing streams; Identification and protection of habitat for rare species and species of concern; Road and crossing assessment and improvement recommendations and sediment reduction strategies; Preparation of Lake or Streambed Alteration agreements and 1600s; Identification and assessment of cumulative impacts; Botanical surveys; Overstory and understory species identification; Data management and organization; Work in rugged terrain and inclement weather, individually or in small crews, navigation of remote forest roads and use of ATV; Use of GIS and GPS for both in office assessment and in field data collection and navigation; Extensive use of computers (Microsoft Excel, Word, Access) and internet research. |
| Thomas Blair | Thomas Blair holds a BS from Humboldt State University, graduating in 1993. He worked with Western Timber Services from 1994 – 1999, which preceded his foundation of Blair Forestry Consulting in 2000. Blair Forestry Consulting is primarily focused on timber cruising and timber harvest plan layout. Thomas has been involved in many carbon projects both as a California RPF (#2607) as well as has worked on carbon projects outside of the state of California. |

Appendix D: Document Tracking

| Version | Date | Developed By | Version Notes |
|---------|------------|-----------------|---|
| 1.0 | 6/2/2022 | Alexa Kandarlis | Initial Document |
| 1.1 | 12/9/2022 | Bill Stack | Draft Final Document |
| 1.2 | 12/13/2022 | Robert Turner | Lead verifier/validator review |
| 1.3 | 12/14/2022 | Bill Stack | Updated based on Lead's review comments |
| 1.4 | 12/19/2022 | Pablo Reed | Technical Review |
| 1.5 | 12/20/2022 | Bill Stack | Updated based on Technical Review comments |
| 1.6 | 12/21/2022 | Alexa Kandarlis | Final Approval |
| 1.7 | 12/21/2022 | Bill Stack | Updated based on Final Approval Comments |
| 2.0 | 3/8/2023 | Bill Stack | Updated based on ACR review comments & revised project documents |
| 2.0 | 3/10/2023 | Robert Turner | Lead validator/verifier review (no changes needed) |
| 2.1 | 3/13/2023 | Pablo Reed | Technical Review |
| 2.2 | 3/14/2023 | Alexa Kandarlis | Final approval |
| 2.3 | 3/22/2023 | Bill Stack | Updated validation/verification activities-dates |
| 2.4 | 3/31/2023 | Bill Stack | Updated validation/verification activities-dates & doc references |

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| S&A Carbon Lead Validator/Verifier Name and Signature: | Robert Turner  |
| Date: | 3/31/2023 |
| S&A Carbon Technical Reviewer Name and Signature: | Pablo Reed  |
| Date: | 3/31/2023 |