VALIDATION AND VERIFICATION REPORT

American Carbon Registry

Wildlands Carbon Initiative

Reporting Period:
16 June 2022 to 30 September 2023

Prepared for:

Wildlands Carbon LLC

07 January 2025

Prepared by:
Dr. Erynn Maynard-Bean | Lead Auditor
Greenhouse Gas Verification Program
+1.510.452.8000
emaynard-bean@scsglobalservices.com

SCSglobal SERVICES
Setting the standard for sustainability™
2000 Powell Street, Ste. 600, Emeryville, CA 94608 USA
+1.510.452.8000 main | +1.510.452.8001 fax
www.SCSglobalServices.com

Project Title	Wildlands Carbon Initiative
Client	Wildlands Carbon LLC
Prepared By	SCS Global Services
Date of Issue	07 January 2025
Contact	2000 Powell Street, Suite 600, Emeryville, CA 94608, USA http://www.scsglobalservices.com Email: CPollet-Young@scsglobalservices.com Telephone: +1 (510) 452-8000
Audit Team	Lead Auditor: Dr. Erynn Maynard-Bean Auditors: Andrew Russo, Christie Pollet-Young, Bryan Cummings Internal Reviewer: Alexander Pancoast

Executive Summary

This report describes the validation and initial verification services provided for the Wildlands Carbon Initiative project ("the project"), an Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Carbon Sequestration on Non-Federal Forestlands v1.3 project located in New York, Connecticut, and Maine, USA, that was conducted by SCS Global Services. The overall goal of the validation engagement was to review impartially and objectively the GHG project plan against the requirements laid out in the ACR Standard and relevant methodology. The overall goal of the verification engagement was to review impartially objectively the claimed GHG emission reductions/removal enhancements for the reporting period from 16 June 2022 to 30 September 2023 against relevant ACR standards and the approved methodology. The validation and verification engagements began with the opening meeting on 21 September 2023 and were carried out through a combination of document review, interviews with relevant personnel and on-site inspections. As part of the validation and verification engagements 37 findings were raised: 11 Non-Conformity Reports, 23 New Information Requests and 3 Observations. These findings are described in Appendix A of this report. The project complies with the validation and verification criteria, and SCS holds no restrictions or uncertainties with respect to the compliance of the project with the validation and verification criteria.

Table of Contents

1 Introduction

1.1 About SCS Global Services

SCS Global Services (SCS) is a global leader in third-party certification, auditing, testing services, and standards. Established as an independent third-party certification firm in 1984, our goal is to recognize the highest levels of performance in environmental protection and social responsibility in the private and public sectors, and to stimulate continuous improvement in sustainable development. In 2012, Scientific Certification Systems, Inc. began doing business as SCS Global Services, communicating its global position with offices and representatives in over 20 countries.

SCS' Greenhouse Gas (GHG) Verification Program has been verifying carbon offsets since 2008 and to date has verified nearly 300 million tonnes of CO2e, providing GHG verification services to a wide array of industries including manufacturing, transportation, municipalities, and non-profit organizations. The GHG Verification Program draws upon SCS's established expertise to serve the global carbon market.

1.2 Objectives

1.2.1 Validation Objectives

The overall goal of third-party validation was to review impartially and objectively the GHG project plan against the requirements laid out in the ACR Standard and relevant methodology. SCS independently evaluated the project design and planning information, based on supporting documentation and GHG validation best practices.

The objectives of validation were 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).

SCS reviewed any relevant additional documentation provided by the project proponent to confirm the project's eligibility for registration on ACR.

1.2.2 Verification Objectives

The overall goal of third-party verification was to review impartially and objectively the claimed GHG emission reductions/removal enhancements against relevant ACR standards and the approved

methodology. SCS independently evaluated the GHG assertion, based on supporting evidence and GHG verification best practice. The objectives of verification were to evaluate

- 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.
- Any significant changes in the GHG project's baseline emissions and emission reductions/removal enhancements since the last verification.

SCS reviewed the GHG project plan, GHG assertion, and any additional relevant documentation provided by the client 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 was consistent with the GHG project plan.
- Eligibility for registration on ACR.
- Sources and magnitude of potential errors, omissions, and misrepresentations, including the
    - Inherent risk of material misstatement.
    - Risk that the existing controls of the GHG project would not have prevented or detected a material misstatement.

1.3 Scope

1.3.1 Scope of Validation

The validation included examination of all of the following elements of the 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
- Project-specific conformance to ACR eligibility criteria

1.3.2 Scope of Verification

Verification included examination of some or all of the following elements of the 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 client staff
- QA/QC procedures and results
- Processes for and results from uncertainty assessments
- Project-specific conformance to ACR eligibility criteria

SCS examined the reported data, quantification methodologies, calculation spreadsheets or databases, source data, project data management systems, data quality controls in place, measurement and monitoring systems, and records pertaining to emissions quantification. Calculation and error checks, site inspections, interviews with project participants, an iterative risk assessment, sampling plan, and audit checklist were performed to the extent necessary for SCS to develop an understanding of how data are collected, handled, and stored for a specific project.

Finally, as a full verification, the verification services included a field visit to the project site and

- Such carbon stock measurements as SCS required to provide a reasonable level of assurance that the GHG assertion is without material discrepancy (per ACR's materiality threshold of ±5%).
- Updated assessment of the risk of reversal and an updated buffer contribution.

1.4 Validation and Verification Criteria

The validation and verification criteria were comprised of the following:

- ACR Standard, Version 8.0
- Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands, Version 1.3 ("the methodology")
- Version 1.3 Errata and Clarifications to the Methodology, 2024-01-01
- ACR Validation and Verification Standard, Version 1.1

- ACR Tool for Risk Analysis and Buffer Determination, Version 1.0

1.5 Level of Assurance

The level of assurance was reasonable.

1.6 Treatment of Materiality

For validation purposes, a material misstatement was declared if any of the following circumstances were detected:

- The physical or geographic boundary of the GHG project plan was not reasonably accurate.
- In respect of the project baseline,
    - The procedures for determining baseline emissions were not technically sound.
    - Data representative of the operations and activities had not been used, either from a single year or a multi-year average.
    - The baseline scenario chosen was not one for which verifiable data are available.
- In respect of the quantification methodology,
    - The quantification method for each data type was not clearly defined, and/or the degree of supporting documentation provided was inadequate to support a reasonable level of assurance.
    - Methods were not appropriate for accurately quantifying each data type:
        - Activity data had not been correctly applied from the original documentation.
        - The most accurate activity data readily available had not been used.
        - The quantification methodology did not account for all variations in activity data over the relevant crediting period.
        - Any emission factors used did not meet the requirements of the approved methodology and/or are not appropriate to the activity.
        - Any emission factors used had not been correctly applied from the original documentation to the relevant activity data.
        - The most appropriate factors readily available had not been selected.
        - Where there was a choice among equally defensible emission factors, the principle of conservativeness had not informed the choice of emission factors.
    - Methods were not applied consistently to develop estimates of emission reductions and removal enhancements.
    - The ISO principle of conservativeness was not applied; i.e., the choice of assumptions, calculation methods, parameters, data sources, and emission factors was not more likely to lead to an underestimation than overestimation of net GHG emission reductions and removal enhancements.

For verification purposes, it was required that discrepancies between the emission reductions/removal enhancements claimed by the project proponent and estimated by SCS be immaterial, i.e. be less than ACR's materiality threshold of ±5%, as calculated according to the equation in the ACR Standard.

1.7 Summary Description of the Project

The project is located in New York, Connecticut, and Maine, USA, and is aimed at protecting forests that otherwise might be vulnerable to unsustainable harvesting. The project area is owned by four landowners: The Salisbury Association, The Frenchman Bay Conservancy, The Thousand Islands Land Trust and the Indian River Lakes Conservancy. The aim of the project is to ensure long term environmental benefits provided by the conservation of the forestlands, including providing significant climate benefits through carbon sequestration.

2 Assessment Process

2.1 Method and Criteria

The validation and verification services began with the opening meeting on 21 September 2024 and were provided through a combination of document review, interviews with relevant personnel and on-site inspections, as discussed in Sections 2.2 through 2.4 of this report. At all times, an assessment was made for conformance to the criteria described in Section 1.2 of this report. As discussed in Section 2.5 of this report, findings were issued to ensure conformance to all requirements.

The audit team created an evidence gathering plan following a proprietary evidence gathering plan template developed by SCS which includes a strategic analysis and risk assessment. In accordance with the evidence gathering plan, the audit team identified the risk of a material misstatement or nonconformity with the criteria and considered the results of the materiality assessment (see Section 1.6 above). Sampling and data testing activities were planned to address areas of inherent, control, and detection risk. The audit team then created a verification plan that took the evidence gathering plan into account.

2.2 Document Review

The GHG project plan (ACR704_Wildlands_GHG_Project_Plan_20250103.docx.pdf; "PP") and monitoring report (Wildlands_RP1_Monitoring_Report_20250103.docx.pdf; "MR") were carefully reviewed for conformance to the validation and verification criteria. The following provides a list of additional documentation, provided by project personnel in support of the aforementioned documents, that was reviewed by the audit team.

Documentation Reviewed During the Course of Validation and Verification Activities		
Document	**File Name**	**Ref.**

Multi Site Design Document	ACR-Multi-Site-Design-Document-v1.1_20250103.pdf	1
Sustainable Development Goals Report	ACR-SDG-Cont-Report-AFOLU-Project-v1.0-1_20250103.pdf	2
Environmental and Social Impact Assessment Report	ACR-Environmental-and-Social-Impact-Assessment-Report-v1.0_20250103.pdf	3
Quantification workbooks	NEWT_Wildland_Quant_file_structure.txt 17 excel workbooks in the 'ExcelFiles' folder	4
FVS modeling: input, output, and keyword files	5 scenario folders within the 'FVSKeyfiles' folder, each containing 2 .db files and 2 .text files.	5
Stumpage calculations and source data/reports	CT_2021 Q3 Report_added_20240131.pdf NY_stumpagewinter23.pdf ME_2022 Stumpage Price Report_added_202402.pdf Wildlands_Stumpage_Averages_20240509.xlsx	6
Inventory Specifications	WildlandsCarbon_InventoryManual_20240227	7
Spatial data	5 folders within '4_GIS' folder: NEWTPlots20240909 NEWTProjectArea20241004 Wildlands_Cohort 1_Spatial Data_FINAL_20240205 NEWT_DevelopmentData_20241004100 Wildlands_SMZ_20230928	8
Landowner attestations of no activity-shifting leakage and associated ACR deviation approval	SALT Attestation of No Harvest 10-10-24.docx TILT Attestation of No Harvest 10-18-24.pdf Wild Aurora Attestation of No Harvest 10-24-24.pdf FBC Attestation of No Harvest 10-20-24.pdf Hunter-Calhoun Attestation of No Harvest 10-11-24.docx IRLC Attestation of No Activity 10-28-24.pdf ACR-Project-Deviation-Request-v2.0_04_11_2024_APPROVED.pdf	9
Landowner attestations of no commercial harvesting	RP1 Landowner Reporting – FBC.pdf RP1 Landowner Reporting - Hunter-Calhoun.pdf RP1 Landowner Reporting – IRLC.pdf RP1 Landowner Reporting – SALT.pdf RP1 Landowner Reporting – TILT.pdf RP1 Landowner Reporting - Wild Aurora LLC .pdf	10

Carbon credit chain of custody	120338901_v(4)_Inlandsis-Wildlands COTTA (Execution Version)_FULLY-EXECUTED_20221219.pdf	11
Carbon rights	Wildlands_Carbon_Landowner_Agreement__FBC_FullyExecuted.pdf Wildlands_Carbon_Landowner_Agreement__Hunter_Calhoun_FullyExecuted.pdf Wildlands_Carbon_Landowner_Agreement__IRLC_FullyExecuted.pdf Wildlands_Carbon_Landowner_Agreement__SA_FullyExecuted.pdf Wildlands_Carbon_Landowner_Agreement__TILT_FullyExecuted.pdf Wildlands_Carbon_Landowner_Agreement__WildAurora_Villano_FullyExecuted.pdf	12
Ownership	36 pdf files in 'Deeds' folder	13
Easements	12 pdf files in 'Forever-wild conservation easements' folder	14
Start Date Evidence	SALT Belter Lime Rock Belter Parcel WD Sharon Salisbury.pdf	15
Demos of HWP approach	10_polyID_yield_test_verification_03_22_2024.pdf Yield_verification_using_StandID_227_2024_05_13.pdf	16
Supporting evidence for NIR 16	NIR_16_Salisbury.pdf	17
Supporting evidence for NIR 15	NIR15_Belter Lime Rock Survey (1).pdf	18
Evidence for plot removal	SS_plotID237_screenshot.jpg	19
Pre-existing encumbrances	WLC Cohort 1_Property Summary_20241211.xlsm	20
Pre-existing encumbrances	glri-action-plan-3-201910-30pp.pdf	21
Pre-existing encumbrances	FBCF Management Plan KMD edit 2 with Appendices_FINAL.pdf	22
Pre-existing encumbrances	CE recorded_belter.pdf	23
Pre-existing encumbrances	MNRCP_Correspondence_20241209,pdf	24
Pre-existing encumbrances	DEEP_Correspondence_20241210.pdf	25
Risk Analysis	Appendix_E_RiskAnalysisandBufferDetermination.pdf	26
ERT Calcs	PC380_F11_ERTs_2024_12_19_external.jpg	27

2.3 Interviews

2.3.1 Interviews of Project Personnel

Interviewing project personnel was a process wherein the audit team elicited information from project personnel regarding (1) the work products provided to the audit team in support of the PD and MR; (2) actions undertaken to ensure conformance with various requirements and (3) implementation status of the project activities. The following provides a list of personnel associated with the project proponent who were interviewed.

Interview Log: Individuals Associated with Project Proponent			
Individual	**Affiliation**	**Role**	**Date(s) Interviewed**
Chris Shrieves Santosh Subedi	Greenline Climate Greenline Climate	Quantification	9/28/23
Chris Shrieves Tricia Bhatia Sophi Veltrop	Greenline Climate NEWT NEWT	NEWT (northeast wilderness trust) Interview	10/02/23
Chris Shrieves Nick Dolecek	Greenline Climate DEI (Inventory)	Site Visit	Week of 10/16/23
Santosh Subedi Maggie Romo	Greenline Climate Greenline Climate	FVS modelling call pertaining to clearcut approach	3/14/24
Santosh Subedi Maggie Romo	Greenline Climate Greenline Climate	Quantification call pertaining to baseline HWP calculations	3/22/24

2.3.2 Interviews of Other Individuals

The process used in interviewing individuals other than project personnel was a process wherein the audit team made inquiries to confirm the validity of the information provided to the audit team. The following personnel not associated with the project proponent. The following provides a list of individuals not associated with the project proponent who were interviewed.

Interview Log: Individuals Not Associated with Project Proponent			
Individual	**Affiliation**	**Role**	**Date(s) Interviewed**
Peter Dempf	NY State Department of Environmental Conservation	NY State Forest Ranger	3/20/24
Mike Giocondo	NY State Department of Environmental Conservation	DES Stewardship Forester	3/20/24
David Beers	CT Department of Energy & Environmental Protection	CT Service Forester	3/13/24
Michael Jensen	Maine Forest Service	Maine Forest District Forester	3/20/24

2.4 Site Inspections

The objectives of the on-site inspections were as follows:

- Ensure that data collection for sequential sampling purposes (t-test) was carried out to the highest possible quality standards and that our client was comfortable with the work being performed
- Perform field reconnaissance to independently confirm:
    - That the project area has more than 10% canopy cover (or equivalent stocking)
    - Absence of any unreported disturbance or timber harvest
    - Ground-truth stratification of project area
- Independently check the accuracy of spatial information on ownership, as used in delineation of the project area, by visiting a sample of corners or other ownership monuments and comparing actual locations to mapped locations.

In support of the above objectives, the audit team performed an on-site inspection of the project area on the dates 16 October 2023 through 20 October 2023. The main activities undertaken by the audit team were as follows:

- Interviewed project personnel (see Section 2.3.1 of this report) to gather information regarding the monitoring procedures and project implementation
- Carried out on-site inspections of the project's measurement and/or monitoring methodologies through the following activities:
    - Inspected the project areas, visually observing past management types, and taking GPS coordinates at survey markers throughout each major tract in the project area.
    - Selected a sample of inventory data using simple random selection methods.
    - At each selected sample location, took on the ground measurements.
    - Verified the sample by running a paired sample t-test on the independently calculated Mt CO2e/acre on each plot.
- Review of management's commitment to the carbon project.
- Assessment of project during the reporting period to confirm that the project scenario consists of maintaining above baseline carbon stocks through carbon sequestration.

2.5 Resolution of Findings

Any potential or actual discrepancies identified during the audit process were resolved through the issuance of findings. The types of findings typically issued by SCS during this type of validation and verification engagement are characterized as follows:

- Non-Conformity Report (NCR): An NCR signified a discrepancy with respect to a specific requirement. This type of finding could only be closed upon receipt by SCS of evidence indicating

that the identified discrepancy had been corrected. Resolution of all open NCRs was a prerequisite for issuance of a validation and/or verification statement.

- New Information Request (NIR): An NIR signified a need for supplementary information in order to determine whether a material discrepancy existed with respect to a specific requirement. Receipt of an NIR did not necessarily indicate that the project was not in compliance with a specific requirement. However, resolution of all open NIRs was a prerequisite for issuance of a validation and/or verification statement.
- Observation (OBS): An OBS indicates an area where immaterial discrepancies exist between the observations, data testing results or professional judgment of the audit team and the information reported or utilized (or the methods used to acquire such information) within the GHG assertion. A root cause analysis and corrective action plan are not required, but highly recommended. Observations are considered by the audit team to be closed upon issuance, and a response to this type of finding is not necessary.

As part of the audit process, 11 NCRs, 22 NIRs and 3 OBSs were issued. All findings issued by the audit team during the audit process have been closed. All findings issued during the audit process, and the impetus for the closure of each such finding, are described in Appendix A of this report.

2.6 Techniques and Processes Used to Test the GHG Information and GHG Assertion

- Review of project documentation including the PP, MR, multi-site design (Ref. 1), sustainable development goals (Ref. 2), environmental and social impact assessment (Ref. 3), ownership documentation (Refs. 11, 12, 13, 14), attestations (Refs. 9, 10), spatial information (Ref. 8), calculations and modeling files (Refs. 4, 5, 6) to check for project-specific conformance to the ACR standard and methodology, appropriateness of methodologies and tools applied, and accuracy of GHG information and assertion.
- Assessment of any disturbances or forest management activities that took place in the project area during the reporting period.
- Review of baseline and project scenarios.
- Review of the sources, sinks and reservoirs of GHG emissions within the project boundary.
- Assessment of eligibility, additionality, GHG emission reduction assertion and underlying monitoring data to determine if either contained material or immaterial misstatements.
- Assessment of the emission reduction calculation inputs and procedures was performed to review the quantitative analyses undertaken by SIG to convert the raw inventory data into emission reduction estimates during the reporting period. This included a re-calculation of project emissions, ERTs, and uncertainty using inventory data as described below in section 3.1 and 3.2.
- Communicate with project personnel and project proponent via interviews, emails, and meetings to gain a better understanding of the project team's methodologies.

- Examine the data management and quality control processes and its controls for sources of potential errors and omissions.
- Review of project documentation including risk assessment and regulatory compliance.

3 Validation Findings

3.1 Project Boundary and Activities

3.1.1 Project Boundary and Procedures for Establishment

A description of the physical boundary of the project was provided, which is located on 7,048.4 acres of eastern forests across Hancock County, Maine; Jefferson County, New York; St. Lawrence County, New York; and Litchfield County, Connecticut. The land is owned is owned by The Salisbury Association, The Frenchman Bay Conservancy, The Thousand Islands Land Trust and the Indian River Lakes Conservancy. The audit team confirmed that the boundaries were well documented throughout both the document review and site visit activities. During the site visit the audit team independently checked the accuracy of spatial information on ownership, as used in delineation of the project area, by visiting a sample of corners or other ownership monuments and comparing actual locations to mapped locations. Likewise, during document review the audit team inspected project shapefiles (Ref. 8) to confirm project boundaries are accurately represented as compared to boundaries mapped during the site visit, maps provided in the PP, and available satellite imagery.

3.1.2 Physical Infrastructure, Activities, Technologies and Processes

The audit team reviewed the PP, MR and other project documentation (Refs. 1, 2, 3) which indicate potential infrastructure, activities, and technologies used within the project area. The project activity consists of forever-wild conservation easements across the project area which prohibits timber harvesting. The audit team concluded that project activities, infrastructure and technologies will be an improvement in the carbon storage and sustainable forest practices of the area.

3.1.3 GHGs, Sources, and Sinks within the Project Boundary

The GHG sources, sinks and/or reservoirs that are applicable to the Project were confirmed and are listed in the table below. This applies to both the baseline and project scenarios.

3.1.4 Temporal Boundary

The ACR Standard in Chapter 3 states that "ACR defines the eligible Start Date(s) for AFOLU project types in Appendix A, 'ACR Requirements for AFOLU Projects.'" SCS reviewed the PP, MR, and relevant contractual documents (Ref. 15) for authenticity and concluded that the documents provided indicate the project start date is eligible.

For ACR the minimum project term is 40 years and the eligible crediting period for this type of project is 20 years. SCS confirmed that the PP included a timeline with a first crediting period of 20 years and a minimum project term of 40 years.

3.2 Description of and Justification for the Baseline Scenario

The methodology defines an IFM baseline scenario as "the legally permissible harvest scenario that would maximize NPV of perpetual wood products harvests." The GHG Plan indicates that the baseline scenario is typical of practices in the project region. The silvicultural prescriptions used to model and maximize NPV include clear cut, selection harvests, and grow-only scenarios.

Description	Gas	Justification
Above-ground live biomass	CO_2	Major carbon pool subjected to the project activity.
Below-ground live biomass	CO_2	Major carbon pool subjected to the project activity.
Standing dead wood	CO_2	Major carbon pool in unmanaged stands subjected to the project activity.
Harvested wood product	CO_2	Major carbon pool subjected to the project activity.
Burning of biomass	CH_4	Non-CO2 gas emitted from biomass burning.
Leakage Source: Market Effects	CO_2	Reductions in wood products due to the project activity may be compensated for by other entities in the marketplace and must be included in the quantification of project benefits.

During the site visit and through interviews with project personnel and third-party contacts with intimate knowledge of forestry in the region, the audit team verified that relatively aggressive industrial timber harvesting is a common practice in the region. The audit team also conducted a financial feasibility assessment of the baseline scenario using regional stumpage rates to independently verify NPV. SCS determined that the harvesting rate indicated in the baseline scenario would be feasible.

3.3 Project-Specific Conformance to ACR Eligibility Criteria

The audit team reviewed the demonstration of conformance, as set out in the PP, to each of the relevant eligibility criteria listed in the ACR Standard. The audit team confirmed the full conformance of the project with the relevant eligibility criteria. A more detailed assessment of the audit team's findings is provided below.

Actions Undertaken to Confirm Conformance to Eligibility Criteria		
Criterion	**ACR Requirement**	**Validation Activities**
Start Date, All Projects	Non-AFOLU Projects must be validated within 2 years of the project Start Date. AFOLU Projects must be validated within 3 years of the project Start Date.	Confirmation that this report was issued less than 3 years after 16 June 2022, the start date of the project.
Start Date Definition, Non-AFOLU Projects	ACR defines the Start Date for all projects other than AFOLU as the date on which the project began to reduce GHG emissions against its baseline.	Not applicable; this project is an AFOLU project.
Start Date Definition, AR or Wetland Projects	For AR or Wetland restoration/revegetation projects, the Start Date is when the Project Proponent began planting or site preparation.	Not applicable; the project is not an AR or wetland project.
Start Date Definition, IFM Projects	For IFM, the Start Date may be denoted by one of the following: 1. The date that the Project Proponent began to apply the land management regime to increase carbon stocks and/or reduce emissions relative to the baseline. 2. The date that the Project Proponent initiated a forest carbon inventory. 3. The date that the Project Proponent entered into a contractual relationship to implement a carbon project. 4. The date the project was submitted to ACR for listing review. Other dates may be approved by ACR on a case by case basis.	SCS reviewed the project's PP to find the following statement: "The project start date is June 16, 2022, which coincides with the acquisition of the final property in Cohort 1 (i.e., Site-specific Implementation Date within a Programmatic Development Approach (PDA) project)." This was confirmed through review of the provided deed (Ref. 15) and satisfies Option 1 for project start date determination.
Start Date Definition, Avoided	For Avoided Conversion of non-forest, the Start Date is when the Project Proponent implemented the project action physically	Not applicable; the project is not an avoided conversion project.

Conversion Projects	and/or legally, such as securing a concession or placing a land conservation agreement on the project land.	
Start Date Definition, Other Agricultural Land-based Projects	For other Agricultural Land-based projects, the Start Date is the date by which the Project Proponent began the Project Activity on project lands, or the start of the cultivation year during which the Project Activity began.	Not applicable; the project is not an other agriculture land-based project.
Minimum Project Term (AFOLU Projects Only)	Project Proponents of AFOLU projects with a risk of reversal shall commit to a Minimum Project Term of 40 years. The minimum term begins on the Start Date, not the first or last year of crediting. This requirement applies only to AFOLU projects that have had ERTs issued that are associated with GHG removals (sequestration). AFOLU projects that have claimed only avoided emissions are not subject to this requirement.	Review of the PP to confirm that the minimum term is 40 years, as required.
Crediting Period	The Crediting Period for non-AFOLU projects shall be 10 years. All AR projects shall have a Crediting Period of 40 years. All IFM projects shall have a Crediting Period of 20 years. Avoided Conversion projects on both forest and non-forest land with land conservation agreements in place shall have a Crediting Period of 40 years, unless otherwise specified in chosen methodologies. Wetland Restoration/Revegetation projects shall have a Crediting Period of 40 years. The Crediting Periods for agriculture projects that avoid emissions by changing to lower GHG practices and those that include a soil sequestration component will be specified in the applicable methodology.	Review of the PP to confirm that the crediting period is 20 years, as required given the project type.
Real	GHG reductions and/or removals shall result from an emission mitigation activity that has been conducted in accordance with an approved ACR Methodology and is verifiable. ACR will not credit a projected stream of offsets on an ex-ante basis.	Review of the emission mitigation activity, as described in the PP, to confirm that it conforms to the requirements of the methodology and will be verifiable if implemented as described.
Emission or Removal Origin (Direct Emissions)	The Project Proponent shall own, have control over, or document effective control over the GHG sources/sinks from which the emissions reductions or removals originate. If the Project Proponent does not own or control the GHG	Review of the PP and the ownership documentation provided (Refs. 11, 12, 13) to confirm that Project Proponent has control over the GHG sources/sinks from

	sources or sinks, it shall document that effective control exists over the GHG sources and/or sinks from which the reductions/ removals originate.	which the emissions reductions or removals originate on the properties.
Emission or Removal Origin (Indirect Emissions)	For projects reducing or removing non-energy indirect emissions, the following requirement applies: The Project Proponent shall document that no other entity may claim GHG emission reductions or removals from the Project Activity (i.e., that no other entity may make an ownership claim to the emission reductions or removals for which credits are sought).	Not applicable; the project is not reducing or removing non-energy indirect emissions.
Offset Title (All Projects)	The Project Proponent shall provide documentation and attestation of undisputed title to all offsets prior to registration. Title to offsets shall be clear, unique, and uncontested.	Review of the PP, and the ownership documentation provided (Ref. 13) to confirm no offsets prior to registration of the Project and that the Project Proponent has ownership of the properties included in the Project.
Land Title (AFOLU Projects Only)	For U.S. projects with GHG emissions reductions resulting from terrestrial sequestration, Project Proponents shall provide documentation of clear, unique, and uncontested land title. For international projects, Project Proponents shall provide documentation and/or attestation of land title; ACR may require a legal review by an expert in local law. Land title may be held by a person or entity other than the Project Proponent, provided the Project Proponent can show clear, unique, and uncontested offsets title. AFOLU projects that result only in the crediting of avoided emissions with no risk of reversal may not require demonstration of land title.	
Additional	Every project shall use either an ACR-approved performance standard and pass a regulatory surplus test, or pass a three-pronged test of additionality in which the project must: 1. Exceed regulatory/legal requirements; 2. Go beyond common practice; and 3. Overcome at least one of three implementation barriers: institutional, financial, or technical.	Confirmation that the project meets all relevant additionality requirements (see Section 3.4 below for more details).
Regulatory Compliance	Projects must maintain material regulatory compliance. To do this, a regulatory body/bodies must deem that a project is not out of compliance at any point during a reporting period. Projects deemed to be out of compliance with regulatory requirements are not eligible to earn ERTs during the period of non-compliance.	After performing extensive regulatory compliance checks during this reporting period, the audit team found no violations on file with EPA, ECHO, OSHA. In addition, local foresters were interviewed about any regulatory compliance issues on the project area,

	Regulatory compliance violations related to administrative processes (e.g., missed application or reporting deadlines) or for issues unrelated to integrity of the GHG emissions reductions shall be treated on a case-by-case basis and may not disqualify a project from ERT issuance. Project Proponents are required to provide a regulatory compliance attestation to a verification body at each verification. This attestation must disclose all violations or other instances of non-compliance with laws, regulations, or other legally binding mandates directly related to Project Activities.	forestry practices, and a discussion of the regional forestry trends and activity. The audit team also reviewed the regulatory compliance section of the MR submitted.
Permanence (All AFOLU Projects)	AFOLU Project Proponents shall assess reversal risk using ACR's Tool for Risk Analysis and Buffer Determination, and shall enter into a legally binding Reversal Risk Mitigation Agreement with ACR/Winrock that details the risk mitigation option selected and the requirements for reporting and compensating reversals.	Confirmed a total risk percentage of 15% using the ACR Tool for Risk Analysis and Buffer Determination as required by the ACR methodology.
Permanence (Terrestrial Sequestration, Avoided Conversion Projects)	Proponents of terrestrial sequestration or avoided conversion projects shall mitigate reversal risk by contributing ERTs to the ACR Buffer Pool or using another ACR-approved insurance or risk mitigation mechanism.	Confirmed a total risk percentage of 15% using the ACR Tool for Risk Analysis and Buffer Determination as required by the ACR methodology.
Permanence (Geologic Sequestration Projects)	Proponents of geologic sequestration projects shall mitigate reversal risk during the project term by contributing ERTs to the ACR Reserve Account and post-project term by filing a Risk Mitigation Covenant, which prohibits any intentional reversal unless there is advance compensation to ACR, or by using another ACR-approved insurance or risk mitigation mechanism.	Not applicable; the project is not a geologic sequestration project.
Natural Management Requirements (IFM Projects)	All IFM projects must not convert forests from native species to non-native species within ten (10) years of the project Start Date, and the planting of or management for non-native species is not permitted.	Confirmed that non-native species do not constitute a significant percentage of the project area (via site visit and analysis of inventory data), nor are invasive species projected to under either baseline or project scenarios.
Permanence (All Projects)	All projects must adhere to ongoing monitoring, reversal reporting, and compensation requirements as detailed in relevant methodologies and legally binding agreements (e.g., the ACR Reversal Risk Mitigation Agreement).	Confirmed that section D of the PP includes a detailed Monitoring Plan relevant to the methodology.
Net of Leakage	ACR requires Project Proponents to address, account for, and mitigate certain types of	Confirmed that a 40% leakage deduction was applied which is consistent with

	leakage, according to the relevant sector requirements and methodology conditions. Project Proponents must deduct leakage that reduces the GHG emissions reduction and/or removal benefit of a project in excess of any applicable threshold specified in the methodology.	market-leakage per the methodology. Confirmed that a 'Project Deviation Request' was granted to demonstrate no activity shifting leakage via landowner attestations of no timber harvest on any land under ownership or management (Ref. 9).
Independently Validated	ACR requires third-party validation of the GHG Project Plan by an accredited, ACR-approved VVB once during each Crediting Period and prior to issuance of ERTs.	The PP has been independently validated by SCS, an accredited, ACR-approved validation/verification body.
Independently Verified	Verification must be conducted by an accredited, ACR-approved VVB prior to any issuance of ERTs and at minimum specified intervals.	The PP has been independently verified by SCS, an accredited, ACR-approved validation/verification body.
Environmental And Community Assessments	ACR requires that all projects develop and disclose an impact assessment to ensure compliance with environmental and community safeguards best practices. Environmental and community impacts should be net positive, and projects must "do no harm" in terms of violating local, national, or international laws or regulations. Project Proponents must identify in the GHG Project Plan community and environmental impacts of their project(s). Projects shall also disclose and describe positive contributions as aligned with applicable sustainable development goals. Projects must describe the safeguard measures in place to avoid, mitigate, or compensate for potential negative impacts, and how such measures will be monitored, managed, and enforced. Project Proponents shall disclose in their Annual Attestations any negative environmental or community impacts or claims thereof and the appropriate mitigation measure.	Confirmed by reviewing the PP, MR, and Refs. 3 and 2 which indicate that the project has no anticipated negative community or environmental impacts.

3.4 Demonstration of Additionality

The audit team reviewed the demonstration of additionality, as set out in the PP, and confirmed that the additionality requirements set out in the ACR Standard have been met. A more detailed assessment of the audit team's findings is provided below.

3.4.1 Regulatory Surplus Test

A regulatory review of the Project was conducted by the audit team. There are no laws, statutes, regulations, court orders, environmental mitigation agreements, permitting conditions, or other legally binding mandates requiring the project activities.

3.4.2 Common Practice Test

The Project demonstrated that the predominant forest industry technologies and practices that exist within the project's geographic region are similar in comparison to forest type, ecological condition, and species or forest product type.

Through interviews with local managers, observations on site, and a detailed review of published data for the region, the audit team verified the timber harvesting practices involving the silvicultural prescriptions claimed in the baseline scenario are common practice in the region. Additionally, the audit team verified the feasibility of the local mill capacity to accept the different wood products created in the baseline scenario.

3.4.3 Implementation Barriers Test

The "financial barrier" option was chosen by the project proponent as an implementation barrier. SCS Global Services received guidance from ACR personnel, in an email dated 6 June 2019, stating the following:

The intent of the financial implementation barrier test encompasses the interpretation and wording in Table 2, in which "carbon funding is reasonably expected to incentivize the implementation of the project scenario", yielding increased carbon stocks compared to the baseline. A quantitative assessment demonstrating forgone profit as a result of employing the project scenario suffices for passing this test.

Given this guidance, a financial barrier was demonstrated through a quantitative assessment demonstrating foregone profit as a result of employing the project scenario (i.e., demonstrating that the net present value of the baseline scenario was higher than the project net present value of the project scenario). The audit team's findings regarding this assessment are provided below.

The audit team independently conducted a financial feasibility assessment by using local stumpage prices to verify that the baseline scenario could feasibly occur in the project area in the lifetime of the carbon project if the project was not implemented. The audit team also verified the physical feasibility of the harvests proposed as well as verified that the silvicultural prescriptions in the baseline scenario are from published state and federal sources.

3.5 Processes for Emission Reductions/Removal Enhancements Quantification

3.5.1 Methods, Algorithms, and Calculations To Be Used to Generate Estimates of Emissions and Emission Reductions/Removal Enhancements

The audit team validated the methodologies applied to quantify GHG emissions and emission reductions in the baseline and project scenarios. The objective was to determine whether the methods are clearly defined with supporting documentation, appropriate for accurately quantifying each data parameter, applied consistently, and result in a conservative estimate of GHG emissions reductions and removal enhancements.

Section 4.2 provides further detail on the methods, algorithms, and calculations used to generate and validate emissions reductions estimates.

3.5.2 Process Information, Source Identification/Counts, and Operational Details

The forest inventory serves as the primary source of data and information used to quantify emissions reductions. The PP and inventory methodology (Ref. 7) describe the process including sample size, determination of plot numbers, plot layout, data collected, and measurement techniques. Through site visit and document review, the audit team verified the forest inventory methodologies and application.

The inventory data was then run within the Forest Vegetation Simulator with various prescriptions to simulate the baseline and project scenarios. The audit team confirmed that the baseline prescriptions were feasible and representative of common practice conditions in the region (see section 3.4.3).

3.5.3 Data Management Systems

SCS verified through review of the PP and the datasets submitted that the data management systems are in place as described.

3.5.4 QA/QC Procedures

Field data collection QA/CA procedures are described in the inventory methodology (Ref. 7). The field QA/QC procedures include an internal audit of the field data by a senior forester. The audit consists of a minimum of 5% of the samples collected.

Additional QA/QC procedures within the quantification process are described in section E.1.3 in the PP.

3.5.5 Processes for Uncertainty Assessments

The PP describes how baseline and project uncertainty were calculated. The PP states that uncertainty in the combined carbon stocks in the baseline is quantified using equation 12 of the methodology (Ref. 4). The percentage uncertainty in the combined carbon stocks in the project during the reporting period is calculated using equation 20 of the methodology (PP, Ref. 4). The total project uncertainty (percentage)

during the reporting period is quantified using equation 22 of the methodology (PP, Ref. 4). SCS confirmed that the approaches for assessing uncertainty that are identified in the PP are in conformance with the quantification methods required by the Methodology. Further detail on uncertainty quantification is in Section 4.1.

4 Verification Findings

4.1 Results of Quantitative Uncertainty Assessment

SCS devoted a portion of the verification assessment to the review of the manner and propriety by which the project proponent quantified uncertainty associated with the individual GHGs in the project, in addition to the uncertainty of the calculation of GHG emission reductions and removals.

The audit team also calculated the total materiality of the GHG reduction and removal assertion.

4.1.1 Project Uncertainty

The reported total Project Uncertainty (UNC_t) was independently verified using equation 22 in the methodology.

	SCS Values	Client Values	Difference
Reporting Period	**UNCt**	**UNCt**	
RP1	9.05%	9.06%	0.01%

4.1.2 Materiality

$$\%\ Error = \frac{(Project\ Emission\ Reduction\ Assertion - Verifier\ Emission\ Reduction\ Recalculation)}{Verifier\ Emission\ Reduction\ Recalculation} * 100$$

$$\%\ Error = \frac{(69{,}486 - 69{,}699)}{69{,}699} * 100 = \frac{-213}{69{,}699} * 100 = -0.3056\%$$

4.2 Analysis of the Quantification Methodologies and Applicable Data Sets and Sources

The audit team re-quantified project emissions, emissions reductions, and project uncertainty from the raw inventory data provided by the client. This process entailed verifying that the methods detailed in the MR were applied as indicated. The team confirmed that the emissions reduction by conducting the following analysis:

- Recalculate the live aboveground, live belowground, and standing dead carbon pools using Woodall et al. (2011) equations and decay class information using the inventory data provided by the client (Refs. 4, 7)
- Recalculate tree and plot-level live aboveground and standing dead tree defect (Ref. 4)
- Recalculate site index for a random selection of plots using available soil survey data (Ref. 4)

- Use the Forest Vegetation Simulator (FVS) to degrow the raw inventory to the project start date (Refs. 4, 5)
- Randomly select a sample of yield curves used in both the project and baseline scenarios. Run the selected samples in FVS and follow methodologies specified in the PP to calculate carbon stocks. Compare to the client's calculations for the selected yield curves to derive a correction factor to apply to the project and baseline population for the reporting period and ex-ante (Refs. 4, 5).
- Calculate the change in the baseline carbon stock stored in live trees and standing dead trees using equations 1 and 2 of the methodology. Calculate the 20-year average value of carbon remaining stored in wood products 100 years after harvest using equation 3 (Refs. 4, 6)
- With the outputs from equations 1, 2 and 3, calculate the long-term average baseline stocking level for the crediting period using equation 5 of the methodology. Use equation 7 to calculate the annual change in the baseline carbon stock (Refs. 4, 5)
- Calculate the baseline uncertainty in the combined carbon stocks in the baseline using equation 12 (Ref. 4)
- Calculate the change in project carbon stock stored in live and dead trees using equations 13 and 14 (Ref. 4)
- Calculate the change in the project carbon stock and GHG emissions during the reporting period using equation 15 (Ref. 4)
- Calculate the percentage uncertainty in the combined carbon stocks in the project during the reporting period using equation 20 (Ref. 4)
- Calculate the total project uncertainty (percentage) during the reporting period using equation 22 (Ref. 4)
- Calculate the net greenhouse gas emission reductions (in metric tons CO2e) during the reporting period and during each annual vintage using equation 24 in the methodology (Ref. 4)

4.3 Basis of Data and Information Supporting the GHG Assertion

The data and information supporting the GHG assertion were based on industry defaults, future projections, and actual historical records. The future projections are a result of a combination of tree inventory data, site index data, and other data modelled over time. Industry defaults are used in the harvested wood products as well as growth rates for the region. Actual historical records are used to assess stumpage prices, common practice, and boundary assessment.

4.4 Leakage Assessment

SCS confirmed that the applicable market leakage factor of 0.4 was applied. The leakage deduction was calculated as follows:

$$Leakage\ Deduction = \left(\Delta C_{P,t} - \Delta C_{BSL,t}\right) * LK$$

$$Leakage\ Deduction = (27{,}049 - (-)\ 109{,}200) * 0.4 = 54{,}500$$

Note: numbers are rounded up for conservativeness of final emissions reductions.

4.5 Risk Assessment

The reported value of the total risk score, as determined based on the risk analysis documented in the PP and MR, was 15%. The audit team performed a complete review of the risk assessment against the requirements of the ACR Tool for Risk Analysis and Buffer Determination. The audit team concludes that the assignment of risk scores is appropriate and in conformance to the ACR Tool for Risk Analysis and Buffer Determination. A more detailed review of the audit team's conclusions may be found below.

Actions Undertaken to Evaluate Whether the Risk Assessment Has Been Conducted Correctly		
Risk Category	**Value Selected**	**Verification Activities**
A	4%	Confirmation, through site inspections, that project is not located on public or tribal lands
B	4%	Confirmation, through site inspections, that project is not located on public or tribal lands
C	2%	Confirmation, through site inspections, that the project is not located outside the United States
D	-3%	Confirmation that the entire project area is under a forever wild conservation easement that includes mandatory monitoring (Ref. 7)
E	2%	Confirmation, through review of state and federal wildfire risk potential maps, that the project is located in an area of low fire risk
F	2%	Confirmation, through research, interviews, and site inspection that the risk of pest and disease is low
G	0%	Confirmation, through site inspections and using ArcGIS USDA Wetland area geodatabases that the project is not a wetland project or a forest project (i.e., less than 60% of the project area is forested wetland)
H	2%	Confirmation that default value has been applied in the risk assessment calculation

5 Conclusion

Wildlands Carbon LLC is responsible for the preparation and fair presentation of the GHG statement in accordance with the criteria. The audit team asserts, with no qualifications or limitations, that

- The PP conforms, in full, to the validation criteria.
- The quantification of GHG emission reductions and/or removal enhancements, as reported in the MR, conforms to the verification criteria and is without material discrepancy.

Based upon the information made available to SCS and the analyses completed during the verification, SCS was able to reach a positive opinion, with a reasonable level of assurance, that the emission reductions represented by the Project Proponent during the monitoring period of 16 June 2022 to 30 September 2023 are free from material misstatement and in conformance with the assessment criteria.

The following provides a summary of the total emission reductions/removals for this Reporting Period including the buffer pool/reserve account contributions, and net emission reductions/removals:

Annual Emission Reductions and Removals in Metric Tons (tCO_2e) during Reporting Period 1							
Vintage	**Start Date**	**End Date**	**Total Emission Reductions/ Removals (tCO_2e)**	**Buffer Pool/ Reserve Account Contribution (tCO_2e)**	**Net Emissions Reductions/ Removals (tCO_2e)**	**Removals Subset (If Applicable) (tCO_2e)**	**Emission Reductions Subset (If Applicable) (tCO_2e)**
2022	16 Jun 2022	31 Dec 2022	34,335	5,150	29,185	6,816	27,519
2023	1 Jan 2023	30 Sept 2023	47,414	7,113	40,301	9,413	38,001
Total for Reporting Period*			81,749	12,263	69,486	16,229	65,520

**Note: Final numbers are rounded for simplicity and totals may not sum due to rounding.*

Lead Auditor Approval	 Erynn Maynard-Bean, 07 Jan 2025
Internal Reviewer Approval	Alexander Pancoast Alexander Pancoast, 07 Jan 2025

Appendix A: List of Findings

Please see Section 2.5 above for a description of the findings issuance process and the categories of findings issued. It should be noted that all language under "Project Personnel Response" is a verbatim transcription of responses provided to the findings by project personnel.

NIR 1 Dated 30 Jan 2024
Standard Reference: ACR Standard v8.0
Document Reference: PC380_F08_RP1_treelist_08_16_2023.xlsx
Finding: The Standard includes 'Core GHG Accounting Principles' including completeness, accuracy and transparency. Column P of sheet 'GrowthCalcs' in workbook PC380_F08_RP1_treelist_08_16_2023.xlsx contains the calculation of RP1 DBH. However, while DBH is measured in inches, the final units of that column as calculated by the audit team are something like in+in2/yr. In alignment with the principles, please provide more information pertaining to this calculation.
Project Personnel Response: The client responded via email on 9/26/2023, and provided updated calculation workbooks with this calculation error corrected.
Auditor Response: The calculations are correct in the new workbook and the finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NCR 2 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: ACR704_Wildlands_GHG Project Plan_20230831.pdf, SALT Belter Lime Rock Belter Parcel WD Sharon Salisbury.pdf, PC380_F06_LiveC_RP0_2022_treeList_06_19_2023_26SeptUpdated.xlsx
Finding: Section 9.C of the Standard states, "The initial Reporting Period full verification interval begins on the project Start Date..." Table A5.1 of the GHG Plan states under 'Project Start Date' that "The project start date of June 17, 2022 coincides with the acquisition of the final property in Cohort 1..." (Pertaining to this date, please also see finding 3, below.) However, the calculation workbook degrows the inventory to a start date of June 15, 2022. This represents a non-conformity to the calculations surrounding the reporting period interval.
Project Personnel Response: Thank you, the start date was updated to June 16, 2022 to be in line with the execution of the Salisbury Association, Incorporated Deed (SALT Belter Lime Rock Belter Parcel WD Sharon Salisbury.pdf). We have update the start date tree list to 6/16/2022 (PC380_F06_LiveC_RP0_2022_treeList_02_09_2024.xlsx). The start date plot average calc sheet is also updated to reflect this change(PC380_F07_RP0_PlotAvgs_02_10_2024.xlsx)
Auditor Response: The start date was corrected and incorporated into downstream workflows in the calculations workbooks mentioned. However, the first table in Section H2 of the GHG Plan reports 17 June 2022 as the start date in the top row.
Project Personnel Response 2: Thank you for this finding, the start date in Section H2 of the GHG plan has now been updated to 16 June 2022.
Auditor Response 2: The GHG plan has been updated. This finding is now closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M/C

NCR 3 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: ACR704_Wildlands_GHG Project Plan_20230831.pdf, SALT Belter Lime Rock Belter Parcel WD Sharon Salisbury.pdf
Finding: From the ACR Standard, "For IFM, the Start Date may be denoted by one of the following: 1. Land acquisition or easement enrolment date." Table A5.1 of the GHG Plan states under 'Project Start Date' that "The project start date of June 17, 2022 coincides with the acquisition of the final property in Cohort 1 (i.e., Site-specific Implementation Date within a Programmatic Development Approach (PDA) project)." However, the date of the final property acquisition is June 16, 2022 (i.e., within 'SALT Belter Lime Rock Belter Parcel WD Sharon Salisbury.pdf'). This represents a non-conformity to the requirements.
Project Personnel Response: Thank you, the start date was updated to June 16, 2022 to be in line with the execution of the Salisbury Association, Incorporated Deed (SALT Belter Lime Rock Belter Parcel WD Sharon Salisbury.pdf). We have update the start date tree list to 6/16/2022 (PC380_F06_LiveC_RP0_2022_treeList_02_09_2024.xlsx). The start date plot average calc sheet is also updated to reflect this change(PC380_F07_RP0_PlotAvgs_02_10_2024.xlsx)
Auditor Response: The start date in the GHG Plan has been updated to reflect the aforementioned deed and Methodology requirements. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M/C

NCR 4 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3, Errata and Clarifications for ACR IFM Methodology v1.3
Document Reference: NEWT_OwnershipBoundary20230824.shp, NEWT_ProjectArea_20230822.shp
Finding: Pertaining to activity-shifting leakage, the IFM requires that "If the project decreases wood product production by >5% relative to the baseline then the Project Proponent and all associated land owners must demonstrate that there is no leakage within their operations – i.e., on other lands they manage/operate outside the bounds of the ACR carbon project." According to the spatial files provided, there is ownership outside of the project area within the parcels of the project area. Additionally, during NEWT interview, it was determined that there is ownership of parcels outside of the project parcels. Please demonstrate that the 6 landowners have no activity-shifting leakage as outlined and required by the IFM in section D6.
Project Personnel Response: The client responded via email on 10/12/23 with PDFs of email confirmation from each of the 6 landowners that there is no harvesting occurring on any of their properties.
Auditor Response: The errata and clarifications to the IFM require that the 'demonstration' of no activity-shifting leakage "must include one or more of the following:"
· 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;
• Adherence to an ACR approved long-term forest management plan or program as specified in section A.2;
• 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
· 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."
Please demonstrate compliance with the requirement.
Project Personnel Response 2: The 6 landowners plan to adhere to the rules outlined in Section A.2 of the ACR IFM Methodology v1.3, Errata and Clarifications for ACR IFM Methodology v1.3. There were no ongoing harvests occurring at the project Start Date. If commercial harvesting will occur later in the project life cycle, the project area will become certified before any commercial timber harvesting will occur.

Auditor Response 2: Activity shifting leakage does not rely upon whether or not there is harvesting in the project scenario: As quoted from the IFM in the original finding, "If the project decreases wood product production by >5% relative to the baseline then the Project Proponent and all associated land owners must demonstrate that there is no leakage within their operations – i.e., on other lands they manage/operate outside the bounds of the ACR carbon project." Please indicate and provide the supporting evidence for which of the following options is being used to demonstrate compliance with the activity-shifting leakage requirement as outlined in the errata and clarifications:

· 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;

• Adherence to an ACR approved long-term forest management plan or program as specified in section A.2;

• 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

· 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."

Please demonstrate compliance with the requirement.

Project Personnel Response 3: As specified in section A.2 of the ACR IFM Methodology v1.3, Errata and Clarifications for ACR IFM Methodology v1.3, "If the project is not subject to commercial harvest activities within the project area as of the project Start Date, but harvests occur later in the project life cycle, the project area must meet the requirements outlined above before commercial timber harvesting may occur." Please see evidence that there is no harvesting in this reporting period for all lands owned or managed by participating entities here: https://www.dropbox.com/scl/fo/y324t9kd7ufrjkscpwh8e/h?rlkey=kja477y2yjlsubt54ps3778ql&dl=0. If commercial harvesting will occur later in the project life cycle, the project area will become certified before any commercial timber harvesting will occur.

Auditor Response 3: The applicability requirements (IFM A2) are different from the requirements for monitoring activity-shifting leakage (IFM D6). This NCR can only be resolved via a demonstration as indicated in the Errata and Clarifications D6 (see Auditor Responses 1 and 2). Referencing applicability conditions does not resolve the requirements for monitoring of activity-shifting leakage for a project that 'decreases wood production by >5% relative to the baseline…" Where the Errata and Clarification for D6 provide the option for "Adherence to an ACR approved long-term forest management plan or program as specified in section A.2," this is referring specifically to the option in A.2 of "Adhere to a long-term forest management plan or program incorporating all their forested landholdings, prescribing the principals of sustained yield and natural forest management (plan and program criteria subject to ACR approval)." As we have reached the end of the findings workbook space, this finding has been closed and reopened as NCR 26, below, in order to demonstrate compliance with the requirements for monitoring activity-shifting leakage.

Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 5 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: ACR704_Wildlands_GHG Project Plan_20230831.pdf
Finding: Pertaining to activity-shifting leakage, the IFM requires that "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." However, Table A5.1 of the GHG Plan states under 'Net of Leakage' that "Possible leakage effects due to activity shifting are quantified and deducted from the GHG benefits per the methodology." As no activity-shifting leakage is allowed under the IFM, this represents a nonconformity to the requirements.
Project Personnel Response: Thank you for this finding, language has been updated with quantification of leakage being limited to market leakage, as no activity-shifting leakage is allowed by the methodology beyond de minimis levels.
Auditor Response: The GHG Plan has been updated, and so this finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 6 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: WildlandsCarbon_InventoryManual_20230401-PleaseSignPage32.pdf
Finding: The IFM section 'F. QA/QC AND UNCERTAINTY' states that "Standard operating procedures (SOPs) and quality control / quality assurance (QA/QC) procedures for forest inventory including field data collection and data management shall be documented." While on the site visit, the audit team found that the inventory cruise was not conducted in alignment with the inventory manual (i.e., SOPs) submitted. Some examples follow: The inventory manual states that there are 123 plots, while there are data for 140 plots; The inventory manual states “Rotten or missing biomass will be assigned a percentage in 10% increments from a complete and/or un-damaged perspective.” However, the inventory defect data was collected to the nearest 1%; Plot center was marked with ~12” rebars. They were frequently unearthed, likely from frost-heave. The inventory manual states that 'At least 18” of the length of the pipe should be buried in mineral soil or stabilized by a rock pile; At least 6” of the pipe should be visible above the litter later at the time of installation.''; Only 2 of the 8 plots visited had “A metal tag on which the plot identification number is clearly written/inscribed…” as required by the inventory methodology; Many of the points on page 7 of 33 of the inventory manual were not carried out during the inventory cruise as indicated in the manual; Section '2.1.6 Diameter Measurement' of the manual states that “The actual point of measurement of DBH on each tally tree shall be a paint line parallel to the direction of diameter measurement…” There was no paint used in the original inventory cruise. Please provide more information on these inconsistencies.
Project Personnel Response: Thank you for this finding, language has been updated in the inventory manual based on your input, and recommendations have been provided rather mandatory SOPs, as "should" is used to express advice, opinion, or preference versus an obligation.
Auditor Response: The edits to the inventory manual align to the inventory procedures practiced in the field. The finding is closed. However, we note that there appear to be errors introduced by the edits to the inventory manual PDF (e.g., 'Error! Reference source not found.' in body of text page 9 of 33 and elsewhere).
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NIR 7 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3, ACR Validation and Verification Standard
Document Reference: Spatial files within the '4_GIS' folder
Finding: The Methodology states, "Forest land is defined as land at least 10 percent stocked by trees of any size, or land formerly having such tree cover, and not currently developed for non-forest uses. Land proposed for inclusion in this project are shall meet the stocking requirement, in aggregate, over the entire area." The Validation and Verification standard Section 9.A states the "verification of source-level data and records shall include the following activities... determine whether the data used are appropriate and sufficient to allow for the accurate calculation or estimation of GHG emission reductions and/or removals." Please justify the inclusion of a paved, public roadway (Burns Road) within the project area.
Project Personnel Response: Thank you, Burns Road plus a half chain buffer was removed from the project area to ensure project area proposed for inclusion meets the stocking requirement.
Auditor Response: The project area has been updated, this finding is now closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M/C

NIR 8 Dated 30 Jan 2024
Standard Reference: ACR Template for GHG Project Plans, ACR Validation and Verification Standard
Document Reference: ACR704_Wildlands_GHG Project Plan_20230831.pdf
Finding: For section B5, the GHG PP template states to "Describe the baseline scenario, how the baseline was identified and chosen, and why it is the most appropriate baseline for the project." This section of the GHG PP states, "The baseline case includes selection cut and clearcut prescriptions." The Validation and Verification standard Section 9.A states the "verification of source-level data and records shall include the following activities... determine whether the data used are appropriate and sufficient to allow for the accurate calculation or estimation of GHG emission reductions and/or removals." Additional details on each of the harvesting prescriptions 'sufficient to allow for ... accurate calculation' are warranted.
Project Personnel Response: Thank you for this finding, additional details have been added to ACR704_Wildlands_GHG Project Plan_20240226.pdf for each harvest prescription.
Auditor Response: The GHG plan has been updated. Additional clarification is requested on the difference between "Existing" and "Regen" in the third column of table E1.1 of the GHG plan.

Furthermore, table E1.1 also states that the second light selection entry occurs "40 years after the first Heavy Selection" while a review of the "Keyword_newt_LightSelection_02_11_2024" outfile showed that the second entry is consistently occurring 30 years after the first entry (underlining added for emphasis).

Please provide additional information relevant to these discrepancies.
Project Personnel Response 2: Thank you for this finding, clarification has been added to the GHG plan along with correcting the occurrence interval for the second light selection.
Auditor Response 2: Table E 1.1 has been updated. This finding may be closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 9 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: PC380_F02_Wildland_SiteIndex__06_16_2023.xlsx
Finding: Section E1. of the IFM states that, "Local values that are specific to the project circumstances must then be obtained for these key parameters, whenever possible. These values must be based on: Data from well-referenced peer-reviewed literature or other well-established published sources..." In the client's site index workbook the widely-used Carmean method (Carmean et al. 1989) is implemented to calculate site index. The client's workbook, tab 'Site_Index', column R contains 'Adjusted Age' which adds the species/curve-specific number of years to the DBH as outlined in Carmean et al. (1989) and as referred to as 'total age' in the methodological paper. This column R data is used in Equation 2 from Carmean et al. (1989) to calculate site index in column Q, 'calculated SI'. However, under Eq 1, Carmean et al. (1989) specifically states that "BH = 0 when A is total age" and under Eq 2, 'where H, BH, A, S, and e are as in equation (1)..." Please provide relevant information in support of this deviation from the methods in Carmean et al. (1989).
Project Personnel Response: Thanks for this finding, we have made the recommended changes in PC380_F02_Wildland_SiteIndex__02_09_2024.xlsx file.
Auditor Response: While the audit team made no specific recommendation, the project proponents approach now aligns with the peer-reviewed methodology chosen for the calculation of site index. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M/C

NCR 10 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference:
PC380_F11_ERTs_BL10mmbf_8000tons_Proj_noHarvest_RPdateAjdusted_wtdDiscountRate_2023_09_26.xlsx, PC380_F07_RP0_PlotAvgs_06_19_2023.xlsx
Finding: For both baseline and project uncertainty the Methodology states, "For modelled results use the confidence interval of the input inventory data." It appears that despite being named 'Uncertainty Live Tree CO2, initial inventory', the value in cell E2 of sheet 'ERTs' in the PC380_F11 workbook comes from the RP0 date uncertainty for live tree CO2. While immaterial, the use of start date uncertainty is not in conformance with the methodology requirements.
Project Personnel Response: Thanks for this finding, we have used the inventory date uncertainty in the revised ERT calc sheet PC380_F11_ERTs_2024_02_26.xlsx
Auditor Response: The client made changes that reflect inventory date uncertainty. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

OBS 11 Dated 30 Jan 2024
Standard Reference: NA
Document Reference: Wildlands_RP1_Monitoring Report_20230831.pdf
Finding: Template instructions remain in the MR document.
Project Personnel Response: Monitoring Report Updated to ACR Version 5.0
Auditor Response: The monitoring report version has been updated. Template instructions still remain in the MR document. The finding is closed, as it is not clear that removal of the instructions is a requirement of the template.
Bearing on Material Misstatement or Conformance (M/C/NA): C

OBS 12 Dated 30 Jan 2024
Standard Reference: NA
Document Reference: ACR704_Wildlands_GHG Project Plan_20230927.pdf
Finding: Section A8. Parties of the GHG plan lists Chris Shrieves as Carbon Manager for Greenline Climate, but the audit team has been informed that he is no longer employed by Greenline Climate.
Project Personnel Response: Chris Shrieves has been removed and Tim Kramer has been added.
Auditor Response: The change was made to the GHG Plan, and so this finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 13 Dated 30 Jan 2024
Standard Reference: ACR Standard v8.0
Document Reference: PC380_F06_LiveC_RP0_2022_treeList_06_19_2023.xlsx, PC380_F08__RP1_treeList_09_26_2023.xlsx
Finding: In section '2.A GUIDING PRINCIPLES FOR GHG ACCOUNTING' of the Standard includes consistency defined as "Enable meaningful comparisons in GHG-related information. Use consistent methodologies for meaningful comparisons of emissions over time." In the F06 workbook for RP0, the method to grow the inventory DBH to the start date incorporates the days where growth actually occurs (i.e., seasonality/growing season in column 'percentDailyGrowth' of sheet 'Growth-Percents'). In contrast, the F08 workbook for RP1 uses a linear assumption of equal growth across 356 days of the year. Please justify the use of different approaches to grow and degrow the inventory data for RP0 and RP1.
Project Personnel Response: Thanks for this finding. We have used linear growth in both RP0 de-grown tree-list (PC380_F06_LiveC_RP0_2022_treeList_02_09_2024.xlsx)and RP1 up-grown tree list (PC380_F06_LiveC_RP1_2022_treeList_02_09_2024.xlsx).
Auditor Response: The same procedure has now been applied to both RP0 and RP1. The finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M/C

NCR 14 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference:
PC380_F11_ERTs_BL10mmbf_8000tons_Proj_noHarvest_RPdateAjdusted_wtdDiscountRate_2023_09_26.xlsx
Finding: Section C3 3.2 step 3 of the methodology states "If a verified report cannot be obtained, looking up default wood product classes for the project's Assessment Area, as given in the most current Assessment Area Data File". However in the 'HWPs' tab of the 'PC380_F11_ERTs_BL10mmbf_8000tons_Proj_noHarvest_RPdateAjdusted_wtdDiscountRate_2023_09_26' workbook, the Connecticut project area is listed as only being in the Lower New England - Northern Appalachia supersection. However, the Connecticut portion of the project area is also in the Adirondacks & Green Mountains supersection. This represents a nonconformity to the requirements.
Project Personnel Response: Thanks for this finding. In including all four representing supersections the HWPs tab of the PC380_F11_ERTs_2024_02_26.xlsx file, we found a gap in coverage of the supersection shapefile. As a result, we unbiasedly assigned the weighted average values to the unclassified acres and calculated weighted averages from those values. A screenshot of the gap has been included here:
https://www.dropbox.com/scl/fi/d684wrxtuywttrjvuozxd/SS_plotID237_screenshot.jpg?rlkey=5jjs2hm9lsx8uev3t8xfc47vs&dl=0
Auditor Response: Given the gap in the supersection shapefile, we concur with your approach to include those unclassified acres with those of the adjacent supersection. Updates have been made and this finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M/C

NIR 15 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: NEWT_OwnershipBoundary20230824
Finding: Section A2 of the methodology states "Project proponent must demonstrate its ownership or control of timber rights at the project
start date ". There is a substantial disagreement between the provided ownership shapefile and the project area's ownership recorded in the by the CT Department of Energy and Environmental Protection found at https://maps.cteco.uconn.edu/viewers/#parcels. Overlaps in question are with the Housatonic State Forest and land hosting the Appalachian Trail. Please provide information that confirms the accuracy of property boundaries in this area.
Project Personnel Response: Thank you, Connecticut parcels are created and maintained by each municipality. The map is an aggregation of all of these parcels. They are created and updated at different time intervals and within varying quality. Disclaimer: The map and data are provided for informational and planning purposes only and accuracy cannot be guaranteed. This is not a survey product. The University of Connecticut and State of Connecticut are not responsible for the misuse or misrepresentation of the data. Survey Map of Property in question is also provided:
https://www.dropbox.com/scl/fi/9ct16ei5xho1iaylep3ws/NIR15_Belter-Lime-Rock-Survey-1.pdf?rlkey=ekbruiqsienzexu57zjivk8qq&dl=0
Auditor Response: This response provides information that is sufficient to close the finding.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 16 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: NEWT_OwnershipBoundary20230824
Finding: Section A2 of the methodology states "Project proponent must demonstrate its ownership or control of timber rights at the project
start date ." Connecticut's tax lots shapefile list one of the lots within the project ownership as belonging to a different owner. Please confirm accuracy of property ownership in this area.
Project Personnel Response: Connecticut parcels are created and maintained by each municipality. The map is an aggregation of all of these parcels. They are created and updated at different time intervals and within varying quality. Disclaimer: The map and data are provided for informational and planning purposes only and accuracy cannot be guaranteed. This is not a survey product. The University of Connecticut and State of Connecticut are not responsible for the misuse or misrepresentation of the data. Survey Map of Property in question is also provided: https://www.dropbox.com/scl/fi/4blbrultpozpp4cg3wxk3/NIR_16_Salisbury.pdf?rlkey=89xsbitakdqfyfyq2c7wnzb44&dl=0
Auditor Response: This response provides information that is sufficient to close the finding.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 17 Dated 30 Jan 2024
Standard Reference: ACR Standard v8.0
Document Reference:
PC380_F11_ERTs_BL10mmbf_8000tons_Proj_noHarvest_RPdateAjdusted_wtdDiscountRate_2023_09_26
Finding: Section 6.A. states "The vintage year of the ERTs correspond to the year the GHG emission reductions/ removals occurred." However the vintage A/B calculations in Rows 37-42, 53 and 54 for RP1 are not calculated for each year. This represents a nonconformity to the requirements.
Project Personnel Response: Thanks for this finding. We have added ERT Summary tab on PC380_F11_ERTs_2024_02_26.xlsx to show vintage calculations for RP1.
Auditor Response: The ERT Summary tab has been added. However the proportions that are being calculated in this new tab do not match the values being used in the calculations in rows 37-42 of the ERTs tab. This continues to represent a nonconformity.
Project Personnel Response 2: Thank you for this finding, the ERT summary tab references rows 51-52, and not 37-42. The calculations for rows 37-42 have been corrected.

Auditor Response 2: The described changes have been made. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NIR 18 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: Wildlands_Stumpage_Averages_20230824
Finding: Section C3 3.2 of the methodology states that "Baseline harvested wood quantities and species are derived from modelling a baseline harvesting scenario using an approved growth model." Please justify the approach of (1) giving equal representation to the (2) sub-set of species used in the Wildlands_Stumpage_Averages_20230824.xlsx compared to the inventory and cited stumpage reports.
Project Personnel Response: Thanks for this finding. The species mix provided in the Wildland_Stumpage_Averages_20240215.xlsx represent hardwood and softwood species mix in the project area.
Auditor Response: Please demonstrate the rationale (considering the Standard and Methodology principles of accuracy and conservativeness) for the species used in calculating stumpage values with an emphasis on those species included in stumpage value calculations that are not found in the forest inventory.
Project Personnel Response 2: Thank you, the species used for calculating the stumpage values are accurate and represented in the carbon inventory.

Auditor Response 2: Please demonstrate the rationale (considering the Standard and Methodology principles of accuracy and conservativeness) for the species used in calculating stumpage values with an emphasis on those species included in stumpage value calculations that are not found in the forest inventory. Specifically, the following mismatches were noted between the inventory, the documents supporting the stumpage prices, and the species that were selected to calculate the stumpage values (these do not need to be individually addressed, so long as the rationale clearly demonstrates how decisions were made about which species to include or exclude):

For Connecticut:
Beech species are included in the calculations, but there are no beech species recorded in the portion of the inventory which was taken in Connecticut.
Spruce species are included in the calculations, but there are no spruce species recorded in the portion of the inventory which was taken in Connecticut.
Yellow birch are included in the calculations, but there are no yellow birch recorded in the portion of the inventory which was taken in Connecticut.
Black birch are included in the stumpage report and the Connecticut inventory, but black birch was not included in the species used for stumpage calculations.
Paper birch are included in the stumpage report and the Connecticut inventory, but paper birch was not included in the species used for stumpage calculations.

For Maine:
Ash species are included in the stumpage report and the Maine inventory, but Ash is not included in the species used for stumpage calculations.
Aspen/poplar species are included in the stumpage report and the Maine inventory, but aspen/poplar species are not included in the species used for stumpage calculations.
Beech species are included in the stumpage report and the Maine inventory, but beech species are not included in the species used for stumpage calculations.
Cedar species are included in the stumpage report and the Maine inventory, but cedar species are not included in the species used for stumpage calculations.

For New York:
Aspen species are included in the stumpage report and the New York inventory, but Aspen is not included in the species used for stumpage calculations.
Basswood are included in the stumpage report and the New York inventory, but Basswood is not included in the species used for stumpage calculations.
Beech species are included in the stumpage report and the New York inventory, but Beech are not included in the species used for stumpage calculations.
Black cherry is included in the stumpage report and the New York inventory, but black cherry is not included in the species used for stumpage calculations.
Hemlock species are included in the stumpage report and the New York inventory, but hemlock are not included in the species used for stumpage calculations.
Hickory species are included in the stumpage report and the New York inventory, but hickory are not included in the species used for stumpage calculations.
Red oak is included in the stumpage report and the New York inventory, but red oak is not included in the species used for stumpage calculations.
White ash is included in the stumpage report and the New York inventory, but white ash is not included in the species used for stumpage calculations.

White oak is included in the stumpage report and the New York inventory, but white oak is not included in the species used for stumpage calculations.
White Pine is included in the stumpage report and the New York inventory, but White Pine is not included in the species used for stumpage calculations.
Red pine is included in the calculations, but there are no red pine is recorded in the portion of the inventory which was taken in New York.
Spruce species are included in the calculations, but there are no spruce recorded in the portion of the inventory which was taken in New York.

For an example with specific numbers, there are 51 living eastern white pines in the New York portion of the inventory while New York plots as a whole have 376 living trees. The "New York State Stumpage Price Report Winter 2023" includes white pine as one of its most common species for the Adirondack region, however it was not included in the "Wildlands_Stumpage_Averages_20240215" workbook's calculations for the state of New York.
Project Personnel Response 3: Thank you, stumpage pricing was updated with weighted averages based on what is in the inventory. Tree-level FVS merchantable volumes were used to calculate species-level contributions to total pulp and sawtimber volumes at the state level. The percentages by species were then used to calculate weighted average hardwood and softwood pulp and sawtimber prices for each state based on updated species-level stumpage price information. These prices were then averaged across states with values for each state weighted by the number of carbon inventory plots in that state to give overall weighted average prices for hardwood and softwood pulp and sawtimber.
Auditor Response 3: Updates have been made that reflect the inventory and species, therefore, this finding is closed. However, please see related finding NIR 33.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NIR 19 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: Wildlands_Stumpage_Averages_20230824
Finding: Section C3 3.2 of the methodology states that the developer must "determine what percentage of a Project Area's harvest will end up in each wood product class for each species." Please justify the "Total AVGs" tab of the "Wildlands_Stumpage_Averages_20230824" workbook giving equal weight to each state.
Project Personnel Response: Thanks for this finding. Although CT has the least acreage among the three states represented in this project, it has the most heavily stocked stands of the three states. So instead of using acre-weighted average, we used the simple average between the three states. This approach is conservative, as CT has the lowest stumpage among the three states.
Auditor Response: As this is more conservative method of calculating stumpage values, it is acceptable. Thus the finding is now closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NCR 20 Dated 30 Jan 2024
Standard Reference: ACR Standard v8.0
Document Reference: ME 2020 Stumpage Price Report_03042022 & CT_2021 Q1 Report
Finding: Per Chapter 4 of ACR Standard v8.0 "ACR's additionality requirements are intended to ensure that GHG emission reductions and removals are in excess of what would have occurred under... current industry practices" However the reports used to calculate Maine and Connecticut's stumpage values are not the latest version of those reports. This represents a nonconformity to the requirements.
Project Personnel Response: Thanks for this finding. We have used the latest stumpage rates for ME and CT in Wildland_Stumpage_Averages_20240215.xlsx file.
Auditor Response: The values have been updated. This finding is now closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NIR 21 Dated 30 Jan 2024
Standard Reference: ACR Standard v8.0
Document Reference: ME 2020 Stumpage Price Report_03042022
Finding: Per Chapter 4 of ACR Standard v8.0 "ACR's additionality requirements are intended to ensure that GHG emission reductions and removals are in excess of what would have occurred under... current industry practices." However, the pulpwood price per ton values for Hemlock and Pine on the "ME" tab of the "Wildlands_Stumpage_Averages_20230824" workbook do not match the values in the "ME 2020 Stumpage Price Report_03042022" report. Please explain this discrepancy.
Project Personnel Response: Thanks for this finding. We have used the updated values in Wildland_Stumpage_Averages_20240215.xlsx file.
Auditor Response: The values have been updated. This finding is now closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NIR 22 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3, FVS NE Variant.pdf
Document Reference: PC380_F10_OptimizatinOutputs_08_29_2023_27SeptUpdated
Finding: Section 3.2, Step 1 of the IFM states "Determine the amount of wood harvested (actual or baseline) that will be delivered to mills, by volume (cubic feet) or by green weight (lbs.), and by species for the current year (y)... a. Baseline harvested wood quantities and species are derived from modelling a baseline harvesting scenario using an approved growth model." Under 'Sawtimber Volume Specifications' for the FVS NE Variant the default 'Minimum DBH / Top Diameter' for hardwoods is 11.0/9.6 inches and for softwoods is 9.0/7.6 inches. The keyword files used as input for FVS modelling include: BFVolume 0 All 11 5. Please justify the changes to the default board foot volume calculations.
Project Personnel Response: Thanks for this finding. We have used the default FVS merch specs in the revised baseline.
Auditor Response: While some of the keyword files now use the default values, the keyword file, Keyword_newt_regen_02_12_2024.key, now edits the default minimum merchantability DBH to 10 for all sawlogs, and to 6 for all pulp. Please justify the changes to the default FVS values which contrasts with the finding response provided.
Project Personnel Response 2: Thanks for the opportunity to update this. We have changed the merch specs on the regen stands to default FVS merch specs. With this change, we have defaulted to FVS merch specs on all growth and yield files.
Auditor Response 2: The described changes have been made (i.e., default values now used). This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M/C

NIR 23 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: FVSoutput_selection__08_17_2023.db, PC380_F14_Activity_Inventory_by_StandID_2024_01_25.xlsx
Finding: Section 3.2, Step 1 of the IFM states "Determine the amount of wood harvested (actual or baseline) that will be delivered to mills, by volume (cubic feet) or by green weight (lbs.), and by species for the current year (y)... a. Baseline harvested wood quantities and species are derived from modelling a baseline harvesting scenario using an approved growth model." In the FVS output folder, the prescription folder 'Selection50Percent' contains the database FVSoutput_selection__08_17_2023.db with a tab including harvested volumes called 'FVS_CutList_East.' The audit team is having difficulty tracing this FVS output to the workbook PC380_F14_Activity_Inventory_by_StandID_2024_01_25.xlsx, sheet 'Baseline_Schd'. To show one specific example, according to 'Baseline_Schd', plot 121 was selected for heavy selection harvest in 2027 and 2057. The 'Baseline_Schd' sheet shows 177.87 in the 'SoftwoodPulp_tons' column, 781.10 in the 'SoftwoodSaw_mbf' column, and nothing for hardwoods. However, the 'FVS_CutList_East' containing this plot/treatment combination (CaseID 5ec0a697-2835-42c0-b7c0-3da99c0de1cf) harvests 2724.6 CuFt softwood sawtimber (or 18.7 mbf/acre or 9503.3 mbf/project), and 1485.1 CuFt of softwood pulp material per acre (or 47.1 tons/acre or 2393.6 tons/project) and 8.2 CuFt of hardwood material (or 0.3 tons/acre or 15.2 tons/project). Please provide a clear explanation of the approach to developing the harvested wood in the 'Baseline_Schd' tab from the FVS model output.
Project Personnel Response: Thank you for bringing this to our attention. We have discovered that we shared the incorrect version of the .db file. This issue has been rectified in the new files.
1. PC380_F13_Activity_Inventory_by_StandID_2024_02_22.xlsx
2. FVS key files, input files, .out files, and output .db files for letgrow/cc, light selection, heavy selection, and regen scenarios
Auditor Response: The files have been updated and align across workbooks/calculations. This finding is closed. But, see related finding 28.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NIR 24 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3, ACR Validation and Verification Standard
Document Reference: NA
Finding: Section 3.1 of the IFM states that "The GHG Plan must detail what model is being used and what variants have been selected. All model inputs and outputs must be available for inspection by the verifier...Examples of appropriate models include: FVS: Forest Vegetation Simulator..." The audit team randomly selected additional FVS output to check. Please provide the FVS output for the clearcut harvests occurring in 2067 and 2052 (e.g., .db, .out, .key).
Project Personnel Response: In order to check the FVS outputs for the clearcut harvests occurring in 2052 and 2067, you will need to examine the FVSoutput_letgrow_02_11_2024.db file. The associated keyfile and outfiles are labelled Keyword_newt_letGrow_02_11_2024.key and Keyword_newt_letGrow_02_11_2024.out.

In the Keyword_newt_letGrow_02_11_2024.db file, if you filter FVS_TreeList_East with the stands that are being clearcut in 2052 and 2067 (this information can be extracted from the Baseline_schd or Baseline_Rx tab of the PC380_F13_Activity_Inventory_by_StandID_2024_02_22.xlsx file), you will find the trees that are being cut in those years. The net volume/C metric tons are adjusted for any defect% calculated in the PC380_F05_defect_02_10_2024.xlsx file.
Auditor Response: The FVS data is provided, this finding is closed. However, see related finding 28.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 25 Dated 30 Jan 2024
Standard Reference: ACR IFM Methodology v1.3, FVS NE Variant.pdf
Document Reference: NA
Finding: Section 3.1 of the IFM states that "The GHG Plan must detail what model is being used and what variants have been selected. All model inputs and outputs must be available for inspection by the verifier...Examples of appropriate models include: FVS: Forest Vegetation Simulator... Models must be: • Peer reviewed in a process involving experts in modelling and biology/forestry/ecology • Used only in scenarios relevant to the scope for which the model was developed and evaluated • Parameterized for the specific conditions of the project." The FVS ne variant does not have complete built-in regeneration capabilities, so regeneration must be specified by the user. Please provide the audit team with additional information on your method for developing the tree regeneration numbers applied in FVS (i.e., 'Natural' keyword).
Project Personnel Response: Thanks for this observation. Stands were regenerated post-clearcut using the 'natural' keyword to their original species composition. An average Trees Per Acre (TPA) was calculated on a project basis and used as the basis for the number of trees to be naturally regenerated post-clearcut.
Auditor Response: The approach to regeneration appears to generate conservative, reasonable scenarios. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 26 Dated 25 Mar 2024
Standard Reference: ACR IFM Methodology v1.3, Errata and Clarifications for ACR IFM Methodology v1.3
Document Reference: NEWT_OwnershipBoundary20230824.shp, NEWT_ProjectArea_20230822.shp
Finding: This finding is a continuation of NCR4, above. Pertaining to activity-shifting leakage, the IFM requires that "If the project decreases wood product production by >5% relative to the baseline then the Project Proponent and all associated landowners must demonstrate that there is no leakage within their operations – i.e., on other lands they manage/operate outside the bounds of the ACR carbon project." According to the spatial files provided, there is ownership outside of the project area within the parcels of the project area. Additionally, during NEWT interview, it was determined that there is ownership of parcels outside of the project parcels. Specifically, the errata and clarifications to the IFM require that the 'demonstration' of no activity-shifting leakage "must include one or more of the following:
· 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;
• Adherence to an ACR approved long-term forest management plan or program as specified in section A.2;
• 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
· 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."
Please demonstrate that the 6 landowners have no activity-shifting leakage on forested land outside of the project area as outlined and required by the IFM and errata and clarifications section D6.
Project Personnel Response: ACR is open to a deviation request to satisfy Section 1.3. A request was submitted to ACR on 3/26/2023 and a copy provided in \Wildlands Carbon_SIG-SCS Shared Folder_RP1\9_Findings Responses\ACR-Project-Deviation-Request-v2.0_20240326
Auditor Response: This finding is closed as the deviation request was granted by ACR, and shared with the audit team on 11 April 2024 via email (ACR-Project-Deviation-Request-v2.0_04_11_2024_APPROVED.pdf).
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 27 Dated 25 Mar 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: ACR704_Wildlands_GHG Project Plan_20240227.pdf, 1_Wildlands_RP1_Monitoring Report_20240222.pdf
Finding: Section D3 of the methodology requires that, "At a minimum, the following data parameters must be monitored: Project area; Sample plot area; Tree species; Tree Biomass; Wood products volume; and Dead wood pool, if selected." Section 'D1. Monitored Data and Parameters' of the GHG Plan and Section V of the MR do not include all of the required data parameters. This represents a nonconformity.
Project Personnel Response: Thank you for this finding. Minimum data parameters have been included in the MR and GHG Plan.
Auditor Response: While the GHG plan includes the sample plot area elsewhere in the document than section D1 it is not listed as a parameter that is being monitored, this parameter is also not included in the monitoring report. This still represents a nonconformity.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 28 Dated 25 Mar 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: Folder named 'FVS keyfiles',
PC380_F13_Activity_Inventory_by_StandID_2024_03_14.xlsx
Finding: Section 3.2 'Wood Products Calculations' of the IFM outlines the "... five steps required to account for the harvesting of trees and to determine carbon stored in wood products in the baseline and project scenarios." There appear to be discrepancies in stand-level HWP as reported in PC380_F13_Activity_Inventory_by_StandID_2024_03_14.xlsx for the baseline scenario when compared to FVS output (i.e., FVS_Output...db files in each of the Rx subfolders of the 'FVS keyfiles' folder supplied by the client) from which these values are reported to be derived (i.e., NIR 24). As discussed in greater detail during a quantification call with the client on 22 March 2024, the audit team was able to successfully recalculate some values for some harvest prescriptions and categories (i.e., categories being any combination of hardwood versus softwood and pulp tons versus saw mbf versus tons CO2) reported in the 'PC380_F13' workbook, but the same calculations did not replicate values for other category and prescription combinations. Please explain the discrepancies in the calculation of HWP under the baseline scenario.
Project Personnel Response: Thank you for this finding. Originally, when the yield file was fed into the optimizer, softwood saw and hardwood saw were combined as softwood saw for the clearcut regime in the baseline. This has been corrected the baseline is re-optimized. The following four updated Excel files represent the outputs for the corrected baseline:
PC380_F10_OptimizationOutputs_03_22_2024.xlsx
PC380_F11_ERTs_2024_04_02.xlsx
PC380_F12_NPVcalculation_Baseline_2024_03_22.xlsx
PC380_F13_Activity_Inventory_by_StandID_2024_03_22.xlsx
We have also prepared a markdown PDF file (10_polyID_yield_test_verification_03_22_2024) that shows how the yield output on PC380_F13_Activity_Inventory_by_StandID file can be back-calculated from the treelist/cutlist tables. In this file, we have used two test cases: stand id 167, which is getting clearcut rx, and stand id 100, which is getting selection rx in the baseline.
Auditor Response: This finding is paused pending the response to findings 18 and 29.
Project Personnel Response 2: The following four updated Excel files represent the outputs for the corrected baseline:
PC380_F10_OptimizationOutputs_04_29_2024.xlsx
PC380_F11_ERTs_2024_04_29.xlsx
PC380_F12_NPVcalculation_Baseline_2024_04_29.xlsx
PC380_F13_Activity_Inventory_by_StandID_2024_04_29.xlsx
Auditor Response 2: Section ‘3.2 Wood Products Calculations’ of the IFM includes specific calculation steps to determine CO2e under, ‘Step 1: Determine the Amount of Carbon in Harvested Wood Delivered to Mills’. Following ‘Step 1’ and using FVS output files ('FVSKeyfiles' folder) as indicated in NIR 24, the audit team is able to replicate CO2e for some plot-level data but not for others as indicated from PC380_F13_Activity_Inventory_by_StandID_2024_04_29.xlsx, sheet 'Baseline_Schd'. Please demonstrate how calculations of CO2e for each of the 4 categories of HWP (SW/HW, pulp/sawtimber) comply with IFM ‘Step 1’.
Project Personnel Response 3: [Added by the audit team: Client response, via email 14 May, was, "Quantification files have been updated and a PDF file has been added to demonstrate how we calculated green tons, MBF volumes, topwood volumes, and bole CO2 metric tons using Stand ID 227." The demonstration PDF file is named, 'Yield_verification_using_StandID_227_2024_05_13.pdf'.]

Auditor Response 3: The calculations now align with methodology requirements. Downstream values have been updated. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NIR 29 Dated 25 Mar 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: Folder named 'FVS keyfiles', PC380_F13_Activity_Inventory_by_StandID_2024_03_14.xlsx
Finding: Section C1 'Identification of Baseline' of the IFM states, "Consideration shall be given to a reasonable range of feasible baseline assumptions and the selected assumptions should be plausible for the duration of the baseline application." Additionally, section C3, 3.1 of the IFM provides 'examples of appropriate models' and includes the modelling option taken by the client, 'FVS: Forest Vegetation Simulator'. The FVS modelling (i.e., FVS_Output...db files in each of the Rx subfolders of the 'FVS keyfiles' folder supplied by the client) is used to calculate the HWP values reported in PC380_F13_Activity_Inventory_by_StandID_2024_03_14.xlsx for the baseline scenario. However, these reported values exclude FVS pulpwood volume for any tree that also contains FVS saw volume. The audit team understands that it is common practice under many harvesting scenarios in the region for a single tree to produce both saw and pulp volume. Please provide justification for the feasibility of the selected assumption to exclude pulp volume from trees that contain saw volume.
Project Personnel Response: Thank you for this finding. Although topwood from certain species can be a commercially viable commodity in many parts where pulpwood has a fairly decent stumpage, this is not the case in this project area. Pulpwood from hardwood species is approximately $4.24/ton, and from softwood, it is approximately $1.98/ton. The mills that do take topwood have certain dimensional requirements which further complicates merchandising topwood.
Auditor Response: The finding remains open. Please provide verifiable evidence for the feasibility of the selected assumption to exclude pulp volume from trees that contain saw volume as this practice is in contrast to the knowledge and evidence gathered by the audit team. Furthermore, in the selected baseline scenario for the heavy select treatment the largest pulp volume from a saw tree (i.e., currently excluded from HWP) is 12.8 CuFt which exceeds the volume harvest from pulp-only trees in 303/312 trees in the cut list (i.e., those currently included in HWP). To demonstrate how the chosen exclusion of pulpwood functions in the baseline scenario, data from the heavy select treatment follows: The largest residual pulp volume from a saw tree (i.e., currently excluded from HWP) is 12 CuFt (treeID 4658, stand 125) which exceeds the volume harvested from pulp-only trees in 84/88 trees from the FVS cutlist in the selected baseline scenario. Furthermore, the average pulp volume for trees without saw is 5.96 CuFt/tree (525 CuFt total), not far from the average volume of pulp for trees with saw volume, 5.21 CuFt/tree (448 CuFt total, currently excluded from HWP).
Project Personnel Response 2: We have revised the baseline scenario to model topwood. The difference between Merchantable cubic feet and Sawtimber cubic feet was used to calculate the topwood. If the topwood is extracted from hardwood, it is converted to hardwood pulpwood; if it is extracted from softwood, it is converted to softwood pulpwood
Auditor Response 2: This finding is closed, but see NIR 28 related to the calculation of HWP from the FVS output.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NIR 30 Dated 26 Mar 2024
Standard Reference: ACR-Multi-Site-Design-Document-v1.1TEMPLATE.pdf
Document Reference: ACR704_Wildlands_GHG Project Plan_20240227.pdf, ACR Multi Site Design Document_Wildlands_20230831.pdf
Finding: Section I.3 of the Multi Site Design Document template asks 'What is the overarching project Start Date?' In the client's Multi Site Design Document, the overarching Start Date is listed as 6/17/2022, which conflicts with the GHG Plan start date of 6/16/2022. Additionally, the crediting period start date (Section IV) also indicates 6/17/2022. Please explain the discrepancies.
Project Personnel Response: Thank you for this finding. The overarching project Start Date and crediting period start date has been updated to be 6/16/2022, this is in line with the execution of the Salisbury Association, Incorporated Deed (SALT Belter Lime Rock Belter Parcel WD Sharon Salisbury.pdf)
Auditor Response: The Multi-Site Design Document has been updated. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 31 Dated 26 Mar 2024
Standard Reference: ACR-Multi-Site-Design-Document-v1.1TEMPLATE.pdf
Document Reference: ACR Multi Site Design Document_Wildlands_20230831.pdf
Finding: The client's multi-site design document uses, 'American Carbon Registry Multi-Site Design Document, Version 1.0 (July 2023)', but Version 1.1 was released by ACR on 2023-12-01. ACR email guidance on 19 Oct 2023 states, "In recent months, ACR started requiring the use of the new/latest versions of templates for the ...Multi-Site Design Documents..." Please ensure compliance with ACR requirements.
Project Personnel Response: Thank you for this finding, the American Carbon Registry Multi-Site Design Document has been updated to Version 1.1.
Auditor Response: The Multi-Site Design Document has been updated. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 32 Dated 26 Mar 2024
Standard Reference: ACR IFM Methodology v1.3
Document Reference: ACR704_Wildlands_GHG Project Plan_20240227.pdf, PC380_F13_Activity_Inventory_by_StandID_2024_03_14.xlsx
Finding: Section C1 'Identification of Baseline' of the IFM states, "Consideration shall be given to a reasonable range of feasible baseline assumptions and the selected assumptions should be plausible for the duration of the baseline application." The client's GHG Plan states, "The baseline was modelled by enforcing a maximum of 10 MMBF per year in sawtimber and 8,000 tons per year in pulpwood harvests...All properties are located within 30 miles of multiple, active mills with capacity, per the Forisk Mill Database: North American Forest Industry Capacity Database." However, a summary of the client's baseline data (PC380_F13_Activity_Inv...xlsx) suggests that these limits were exceeded (e.g., mmbf exceeded in 2026 and 2027 and pulp tons exceeded in 2022, 2024, 2025, 2090, 2116). Please explain these discrepancies and provide the evidence used to establish these limits (e.g., Forsik data).
Project Personnel Response: Thank you for this finding. Looking at Softwood Pulp (column G) and Harwood Pulp (column I), and Softwood Saw (column H) and Hardwood Saw (column J), we were not able to replicate this documented exceedance for sawtimber. Within the crediting period, pulp wood exceeds by 0.00050 and we believe this is di minimis.
Auditor Response: We confirm that the calculation shows the harvest modelling stays withing the established parameters. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M

NIR 33 Dated 9 May 2024
Standard Reference: ACR Standard v8.0
Document Reference: Wildlands_Stumpage_Averages_20240502.xlsx
Finding: In section '2.A GUIDING PRINCIPLES FOR GHG ACCOUNTING' of the Standard includes consistency and accuracy. This NIR was issued via email on 9 May 2024: The units of the pulp values in the sheet ‘NY’ of the workbook ‘Wildlands_Stumpage_Averages_20240502’ are labelled ‘$/ton’, but these values come directly from ‘NY_stumpagewinter23.pdf’ where they are provided in $/cord. Please justify the unit change without the apparent use of a numerical conversion.
Project Personnel Response: [Added by the audit team: Client response, via email 14 May, was to update the values to be $/cord in Wildlands_Stumpage_Averages_20240509.xlsx. Four downstream excel workbooks were edited accordingly (PC380_F10, F11, F12, and F13).]
Auditor Response: The values for stumpage are now in units corresponding to stumpage reports, and edits have been incorporated into downstream workflows. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M

OBS 34 Dated 9 May 2024
Standard Reference: ACR Standard v8.0
Document Reference: PC380_F12_NPVcalculation_Baseline__2024_04_29.xlsx
Finding: In section '2.A GUIDING PRINCIPLES FOR GHG ACCOUNTING' of the Standard includes consistency and accuracy. This OBS was issued via email on 9 May 2024: Columns N and O (TimberRev and DiscountedTimberRev) of sheet 'Baseline_Saw_10mmbf_pulp_8k' of the PC380_F12 workbook ends calculations at row 289, while the remainer of the data in this sheet continues to row 312. Please confirm whether this is intentional.
Project Personnel Response: [Added by the audit team: Client response, via email 14 May, was, "The quantification excel files have been corrected and updated."]
Auditor Response: The calculations have been updated. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NIR 35 Dated 17 Jun 2024
Standard Reference: ACR Standard v8.0
Document Reference: ACR704_Wildlands_GHG Project Plan_20240603.pdf
IRLC Grand Lake P1 Caldwell WD 12-15-2003.pdf
IRLC Grand Lake P3 Hunneyman 2-8-2012.pdf
IRLC Grand Lake P2 Hillback Supplemental WD 9-1-2011.pdf
Finding: Section 'C1. IDENTIFICATION OF BASELINE' of the IFM states, "The IFM baseline is the legally permissible harvest scenario that would maximize NPV of perpetual wood products harvests." However, several of the deeds covering the project area contain covenants that restrict forestry activities within portions of the project area that appear to conflict with the baseline scenario. Specifically: The "IRLC Grand Lake P1 Caldwell WD 12-15-2003" deed states "No farming… nor any logging or mining in any form shall be permitted on the premises."
The "IRLC Grand Lake P2 Hillback Supplemental WD 9-1-2011" and "IRLC Grand Lake P3 Hunneyman 2-8-2012" deeds state that the properties were "acquired in part with funder from... the U.S. Fish and Wildlife Services and shall remain subject to the terms and conditions described in... Exhibit A." Exhibit A state the property must be administered for "the long -term protection, habitat restoration and enhancement of native great lakes fish and wildlife populations with a particular focus on migratory birds."
Please provide information on how these convenents comply with the requirement for 'legally permissible harvest' in the baseline scenario.
Project Personnel Response: Thank you for this finding. Based on the covenants from IRLC Grand Lake P1 Caldwell WD 12-15-2003, IRLC Grand Lake P2 Hillback Supplemental WD 9-1-2011, and IRLC Grand Lake P3 Hunneyman 2-8-2012 we moved approximately 105.7 acres to a no harvest prescription. In addition, and in an effort to be conservative, we reassigned approximately 369 additional acres to a no harvest prescription where deed covenants intersected with property boundaries and wetland habitats. Harvesting supported on other acres based on the Treyger, S.M. 2019. Managing Forests for Birds: A Forester's Guide. Audubon New York publication. Even age forest <10 years old supports more than 35 native bird species in New York. Fifteen of those are listed as New York State Species of Greatest Conservation Need.
Auditor Response: The updates to the baseline scenario have been made along with downstream updates, and these changes address the deed restrictions. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 36 Dated 23 Sep 2024
Standard Reference: IFM v2.0
Document Reference: ACR-Project-Deviation-Request-v2.0_04_11_2024_APPROVED.pdf, FBC_No Harvesting Confirmation.pdf, IRLC_No Harvesting Confirmation.pdf, SALT_No Harvesting Confirmation, TILT_No Harvesting Confirmation, Whalesback (Wild Aurora)_No Harvesting Confirmation.pdf, Whalesback(Calhoun-Hunter)_No Harvesting Confirmation.pdf
Finding: A deviation was granted to use the option for the demonstration of no activity-shifting leakage in Section 5.4 of the ACR IFM v2.0: "Verifiable evidence of no harvesting in a given reporting period for all lands owned or managed by participating entities (e.g., Project Proponent, landowner) and not enrolled in the carbon project." ACR guidance (via email on 23 Sept 2024) states that 'a signed and dated letter on company letterhead will suffice' as verifiable evidence. The current attestations do not meet this requirement, and additionally do not meet all of the criteria as the provided 'attestations' do not explicitly include:
(1) the 'given reporting period' (e.g., FBC_No Harvesting Confirmation states, "None of FBC's properties are currently being harvested.") and/or
(2) the requirement of 'no harvesting' (e.g., TILT_No Harvesting Confirmation states, "We do not have any active commercial harvests going on at this point in time." Underlining added for emphasis.) and/or
(3) the requirement of 'all lands owned or managed' (underlining added for emphasis, e.g., SALT_No Harvesting Confirmation states, "None of SA's properties are being commercially harvested.")
(4) more explicit reference to the location and acreage 'for all lands owned and or managed by participating entities... and not enrolled in the carbon project.'
Project Personnel Response: [Via email 28 Oct 2024 a link to the updated attestations was provided.]
Auditor Response: This finding is closed as the required verifiable evidence has been provided.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 37 Dated 20 Nov 2024
Standard Reference: IFM v1.3
Document Reference:
Finding: Section 'C1. IDENTIFICATION OF BASELINE' of the IFM states, "The IFM baseline is the legally permissible harvest scenario that would maximize NPV of perpetual wood products harvests." Many of the forever-wild conservation easements refence pre-existing encumbrances and third-party interests. As examples: Belter Lime Rock, Dark Hollow, Pope, and Yoakum easements mention easement through Connecticut Department of Energy and Environmental Protection; Crooked Creek and Many Oaks easements mention the Great Lakes Recovery Initiative Joint Venture Program and Notice of Federal Participation; Frenchman's Bay Community Forest easement mentions participation in the Maine Natural Resource Conservation Program; and Yoakum also mentions the Highlands Conservation Act Program grant agreement. In order for the audit team to be able to determine compliance with the requirement for 'legally permissible harvest' in the baseline scenario, please provide detailed documentation of the encumbrances applicable to all of the properties in the project area, especially those commitments made prior to the forever-wild conservation easements.
Project Personnel Response: [Via email 6 Dec 2024 a link to an excel document organizing deed details was provided titled: WLC Cohort 1_Property Summary_20241204.xlsm]
Auditor Response: The property summary workbook provided outlines the properties with a written synopsis of their encumbrances pre-existing to the NEWT conservation easements (i.e., WLC Cohort 1_Property Summary_20241204.xlsx). In the property summary workbook provided, the 'Frenchman Bay Community Forest' was stated to have an MNRCP awarded to "restore and protect high priority aquatic resources throughout Maine," and that, "We are following guidelines outlined in multi-jurisdictional Best Management Practices and have restricted harvest within 75 feet of a stream." However, according to the auditor-sourced document 'MNRCP Project Land Use Guidelines' (https://www.mnrcp.org/sites/default/files/MNRCP_PropertyUseGuidelines_Jan2023.pdf), "Timber harvesting must not occur in the following locations: in forested wetlands or mapped Inland Waterfowl and Wading Bird Habitat; within at least 100' of any mapped wetland, stream, open water body; or within at least 250' of mapped vernal pools." The BMPs applied in the baseline scenario do not appear to comply with these requirements. Please provide the primary source, pre-existing encumbrance documentation (e.g., agreements, easements, requirements, awards terms, etc...) associated with each of the project parcels so that the audit team can assess compliance with the 'legally permissible harvest scenario' requirement of the IFM baseline.
Project Personnel Response 2: [Via email 11 Dec 2024 a link to an updated excel document organizing deed details was provided titled: WLC Cohort 1_Property Summary_20241211.xlsm as well as the supporting material: CE recorded_belter.pdf, FBCF Management Plan KMD edit 2 with Appendices_FINAL.pdf, glri-action-plan-3-201910-30pp.pdf]
Auditor Response 2: Please provide PDFs of the email correspondences you reference in the excel document (i.e., MNRCP and DEEP).
Project Personnel Response 3: [Via email 13 Dec 2024 a link to the supporting material was provided: DEEP_Correspondence_20241210.pdf, MNRCP_Correspondence_20241209.pdf]
Auditor Response 3: The evidence demonstrates that the pre-existing encumbrances do not conflict with the baseline scenario. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): M/C