Validation and Verification Report

ACR679 Anew - Washburn County Forestry Project

January 29, 2025

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1 INTRODUCTION

Anew Carbon Development LLC (Anew) contracted with Ruby Canyon Environmental, Inc. (RCE) to perform the validation and verification of the ACR679 Anew - Washburn County Forestry Project (Project) for the reporting period of September 21, 2021 – September 20, 2022 and a crediting period of September 21, 2021 – September 20, 2041 under the American Carbon Registry (ACR) program. RCE was acquired by TÜV SÜD America, Inc. (TÜV SÜD) in 2023. RCE will be used throughout this report. Anew acts as the project developer for the landowner and project proponent, Washburn County (Washburn). This report is documentation of validation and verification activities that RCE performed for the Project. For the validation, RCE reviewed the project information as described in the Project Plan "Anew - Washburn County Forestry Project". For the verification, RCE ensured that the GHG assertion was materially correct, that the data provided to RCE was well documented, and that if Anew made any material errors, that these errors were corrected.

RCE worked with Forest Resource Solutions and Technologies (FRST) to complete this validation and verification. FRST was acquired by TÜV SÜD America, Inc. (TÜV SÜD) in 2024.

1.1 OBJECTIVES

The objectives of the validation are to evaluate:

- Conformance to the ACR Standard and the approved ACR Methodology for Improved Forest Management (Methodology);
- The following elements of the GHG Plan:
    - Project boundary and procedures for establishing the project boundary;
    - Physical infrastructure, activities, technologies, and processes of the project;
    - GHGs, sources, and sinks within the project boundary;
    - Temporal boundary;
    - Description of and justification for the baseline scenario;
    - Methodologies, algorithms, and calculations that will be used to generate estimates of emissions and emission reductions/removal enhancements;
    - Process information, source identification/counts, and operational details;
    - Data management systems;
    - QA/QC procedures;
    - Processes for uncertainty assessments; and
    - Project-specific conformance to ACR eligibility criteria.
- Reported GHG baseline, ex ante estimated project emissions and emission reductions/removal enhancements, leakage assessment, and impermanence risk assessment and mitigation (if applicable).

The objectives of the verification are to evaluate:

- The emission reductions and to ensure that the assertion is materially correct;

- The data provided to RCE can be documented and if errors or omissions are detected, they be corrected

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

1.2 Project Background

The Project is located on 117,930 acres of both upland and lowland vegetative cover types in northern Wisconsin's Washburn County. Nearby population centers are small but include Spooner, Minong, and Hayward.

The primary forest types found on the property are Aspen, Pine, Swamp conifer, and Northern Hardwoods. Northern Wisconsin is known to contain premier game species populations such as ruffed grouse, snowshoe hare, woodcock, and White-tailed deer. Much of the property originated after the big cutover period, and over time mid to late successional timber types, like northern hardwood have begun to replace early successional aspen and birch. The Project area has been actively managed for both timber and maximizing public benefits. Management decisions of the forest focus on sustainable, natural forest growth and non-commercial forest maintenance for essential activities and forest health. The Project ensures long-term sustainable management of the forests, which could otherwise undergo significant commercial timber harvesting.

1.3 Responsible Party

Project Proponent

Washburn County
1760 Roundhouse Road
Spooner, WI 54801
Mike Peterson, Washburn County Forest Administrator
715-635-4490

Project Developer

Anew Carbon Development LLC
2825 E. Cottonwood Parkway, Ste 400
Cottonwood Heights, UT 84121
Josh Strauss, Vice President
949-233-1501

1.4 Validation and Verification Team

Lead Validator and Verifier: Zach Eyler, RCE
Professional Forester: Christian Eggleton, FRST
Forest Carbon Project Manager: Tim Facemire, FRST
Forestry Analysts: Andrew Russo, FRST, Anna Woodall, FRST
Internal Reviewer: Bonny Crews, RCE

1.5 Validation and Verification Criteria

1.5.1 Validation and Verification Standards, Guidelines, and Tools

- Anew - Washburn County Forestry Project GHG Plan (March 7, 2024)
    - Verification only
- ACR Standard, Version 7.0 (December 2020)
- ACR Validation and Verification Standard Version 1.1 (May 2018)
- Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non‐Federal U.S. Forestlands v.1.3, April 2018
- Errata and Clarifications - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non‐Federal U.S. Forestlands v.1.3, January 1, 2024
- ACR Tool for Risk Analysis and Buffer Determination, v1.0
- ISO 14064-3:2006 "Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions"

1.5.2 Level of Assurance

The verification was conducted to a reasonable level of assurance.

1.5.3 Materiality

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

2 Validation and Verification Process

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

- RCE completed a COI form on October 9, 2022 to identify any potential conflict of interest with the Project or Project Developer. The COI form was approved by ACR on October 12, 2022.
- RCE and Anew held a validation/verification kick-off meeting on October 17, 2022. During the kick-off meeting RCE reviewed the validation/verification objectives and process, reviewed the schedule, and submitted an initial document request.
- RCE performed a strategic review and risk assessment of the received data and support documents to understand the scope and areas of potential risk in the GHG emissions reductions.
- RCE developed a risk-based sampling plan based upon the strategic review and risk assessment. The validation/verification plan and sampling plan were used throughout the process and were revised as needed based upon additional risk assessments.
- The validation/verification team conducted the site visit to the Project to verify the inventory quality and forest management practices from October 31 to November 3, 2022. During the site

visit the Verification Team performed key personnel interviews, conducted sequential sampling of inventory plots, conducted reconnaissance of the Project area boundary, observed elements of natural forest management, and observed harvest locations (if applicable) during and preceding the reporting period.

- The site visit was attended by the following verification team personnel:
  - FRST:
    - Tim Facemire
    - Andrew Russo
    - Anna Woodall
- During the site visit, the Verification team met with the following individuals:
  - Anew
    - Jason Heffner
  - Steigerwaldt Land Services
    - Mike Ruichel
    - Kate Handberg
    - Nate Handberg

- RCE performed a risk-based desktop review of the submitted validation/verification documents. The desktop review included an assessment of the GHG calculation methods and inputs, source data completeness, GHG management and monitoring systems and eligibility documentation.
- RCE conducted interviews and had conversations with Project personnel during the verification. Personnel interviewed include:
  - Jason Heffner – Anew
  - Mingfei Xiong – Anew
- RCE submitted requests for corrective actions, additional documentation, and clarifications as necessary to Anew throughout the validation/verification.
- RCE's internal reviewer conducted a review of the validation/verification sampling, report, and statement.
- RCE issued a final validation/verification report, verification statement, and List of Findings.
- RCE held an exit meeting with Anew.

3 VALIDATION AND VERIFICATION FINDINGS

3.1 PROJECT BOUNDARY AND ACTIVITIES

The Project is located on 117,930 acres across northern Wisconsin. GHG emission reductions for the Project are quantified by comparing actual onsite carbon stocks against modeled baseline onsite carbon stocks and baseline carbon in harvested wood products. The difference in these Project and baseline carbon stocks year over year is the basis for calculating the Project's primary goal of maintaining and enhancing forest GHG pools.

The Project's temporal boundary is the crediting period from September 21, 2021 – September 20, 2041.

3.2 GHG Sources, Sinks, and Reservoirs

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

Table 1. GHG Emissions Sources

Source	GHG	Description
Above-ground biomass	CO_2	Major carbon pool for project activity
Below-ground biomass	CO_2	Major carbon pool for project activity
Standing dead wood	CO_2	Major carbon pool in unmanaged stands for the project activity
Harvest wood products	CO_2	Major carbon pool for project activity
Market Effects	CO_2	Reductions in project outputs due to project activity may be compensated by other entities in the marketplace. Those emissions must be included in the quantification of project benefits.

3.3 Eligibility

3.3.1 ACR Eligibility

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

- Start Date: The project start date is September 21, 2021.
- Minimum Project Term: The minimum project term is 40 years.
- Crediting Period: The crediting period is 20 years as specified by the Methodology, September 21, 2021 – September 20, 2041.
- Real: RCE confirmed that the GHG reductions follow the ACR methodology and are verifiable.
- Emission or Removal Origin: RCE confirmed that Washburn County owns and has control over, or documented effective control over the GHG sources/sinks from which the emissions reductions or removals originate.
- Offset Title: RCE confirmed that all Project lands are owned directly by the Project Proponent (Washburn), which hold full legal title.
- Additional: RCE confirmed that the project is additional as described in Section 3.4.
- Regulatory Compliance: RCE confirmed that the Project was in compliance with all applicable regulations.
- Permanent: RCE confirmed that the Project correctly applied the ACR Tool for Risk Analysis and Buffer Determination to account for permanence. A total risk score of 16% was confirmed.
- Net of Leakage: RCE confirmed that the Project correctly accounted for leakage per the Methodology.

- Independently Validated and Verified: RCE is a third-party validation and verification body that the project proponent has contracted to validate and verify the Project.
- Environmental and Community Assessments: RCE reviewed project impacts as described in section 3.6 of this report.

3.3.2 Methodology Eligibility

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

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

3.4 ADDITIONALITY

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

3.4.1 Regulatory Surplus Test

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

3.4.2 Common Practice Test

The geographic region for the Project includes northern Wisconsin. Throughout the geographic region, industrial forestland is heavily cut, often through clear-cutting and high-grading, and is managed to maximize NPV of the forestland investment. The project is a public county forestland ownership. Without the Project the property would have been likely managed to maximize timber production to the limits of the FMP and would resemble other county forestlands in the region. With Project implementation the forestland carbon stocks will exceed the common practice found in the region.

3.4.3 Implementation Barriers Test

The Project chose to assess the financial barriers test per the ACR Standard and Methodology. RCE confirmed that carbon funding is reasonably expected to incentivize the Project's implementation and that carbon is a key element to maintaining the project actions ongoing implementation. Due to the Project being implemented, Washburn gains another source of funding in times of levy caps and freezes

which helps mitigate the loss of maximizing timber harvesting that could legally and feasibly occur on the property during the life of the Project. Anew provided a financial assessment comparison of NPV between the baseline scenario with harvesting and the project scenario with reduced harvesting and including revenue from carbon credits. The baseline scenario NPV was significantly greater demonstrating that carbon funding is integral to the project activity.

3.5 Permanence

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

RCE and FRST also confirmed that the Project committed to a 40-year agreement with ACR by signing the AFOLU Carbon Project Reversal Risk Mitigation Agreement. Through this agreement and the ACR Tool the Project adequately addressed potential causes of unintentional reversals.

3.6 Programmatic Development Approach

RCE confirmed that the Project is utilizing a Programmatic Development Approach (PDA). The Project currently only has one "site" but expects to potentially add additional area to the Project in the future. RCE confirmed that the Project has completed the required PDA Project Design Document and included it as an addendum to the GHG Plan.

3.7 Leakage

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

3.8 Environmental and Community Impacts

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

3.9 Local Stakeholder Consultation

A stakeholder consultation occurred since the Project is held on public lands. No comments were generated.

3.10 Monitoring Plan

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

deviations relevant to the Project activity against the requirements of the Methodology. Anew and Washburn implemented the monitoring plan as stated in the Project Plan during Project activities.

3.11 Baseline Scenario

The Project's baseline scenario represents aggressive industrial harvests with stricter parameters than recommended state practices, targeted to maximize net present value at a 4% discount rate for public lands. The baseline scenario applies harvesting across the Project area as allowed by the Methodology to maximize NPV.

The Project's baseline model simulates a range of harvest types and rotation lengths based on legal requirements and simulated growth within each stratum. The objective of modeling was to determine possible timber harvests in the project area over 100-years within the framework of legal and reasonable harvest constraints.

Stands were modeled for several different prescriptions, including no-harvest, shelterwood removal, single tree selection, and clearcut.

Anew utilized the USDA's Forest Vegetation Simulator (FVS) Lake States variant to model harvests and yields. Growth was calibrated using tree cores taken on or near plots, which were used to assign site index values calculated from site index curves and associated equations from Carmean et al 1989. Averaged species site index values supplemented tree core data where cores did not produce a valid sample, and soil data was also incorporated with no species data available. FRST reviewed all data and calculations related to site index and confirmed that a reasonable species and site index for the region was assigned on an individual plot basis to appropriately calibrate growth. The process was confirmed to be consistently and systematically applied to each plot.

RCE reviewed the resulting baseline outputs to ensure that they reflected the modeling objectives and the legal additionality requirements.

3.12 On-site Inventory Verification Check

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

The Project inventory consists of seven forested strata. The Verification Team confirmed that stocking and vegetation comprising a particular stratum were consistent with descriptions in inventory data and the Project Plan. FRST randomized the plot order and measured at least one plot in every stratum during the site visit.

The current inventory contains 261 permanent, fixed-radius plots. At each plot location, trees were measured in two nested plots: a larger 1/15th acre plot with radius of 30.4 feet, and a smaller 1/100th acre plot with radius of 11.78 feet. The larger plot measured all trees greater than or equal to 5 inches DBH while the smaller, nested plot measured all living trees between 1-4.99 inches.

Given this sample design and Project size, the Verification Team was required to achieve a minimum of 14 plots within the project to successfully verify inventory stocking levels. The Project did indeed pass a

paired t-test with the 14 minimum plots.

Project Area

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

3.13 Project Data and GHG Emissions Reductions and/or Removals Assertion

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

3.13.1 Baseline Emissions

RCE and FRST confirmed that the baseline emissions were correctly calculated. Baseline emissions were calculated by reviewing input and output files for every FVS baseline modeling prescription, including forest codes, diameter breaks, merchantability thresholds, rotation lengths, regen/spouting, FVS harvest triggers on individual plots, site indices, treelists, and plotlists modeled over 100 years. The output workbook (100_yr) was then independently recreated in the data checks confirming proper calculation of assigned plot level outputs allocated to prescription based independently confirmed SMZ constrained and unconstrained acres. These values were then compiled into yearly baseline values for live and dead stocks as reflected in the ERT monitoring calculation sheet. A secondary output of this process was the 100-years of modeled harvesting based off Best Management Practices (BMP) constrained acreages which was then run through the prescribed harvested wood product calculations customized for the project region(s). These calculations were made on 40-year time intervals as well as 100-year intervals and they were appropriately incorporated into the ERT monitoring calc sheet. See more detail in section 3.11.

3.13.2 Project Emissions

RCE and FRST confirmed that the project emissions were correctly calculated by the same methods as described in the baseline emissions section 3.13.1.

3.13.3 Emissions Reductions

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

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

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

4 VALIDATION AND VERIFICATION RESULTS

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

5 VALIDATION AND VERIFICATION CONCLUSION

RCE conducted a risk-based validation and verification of the ACR679 Anew - Washburn County Forestry Project that included a strategic review of the project data, documentation, and emission reduction calculations. The objective of the validation activities was to assess the project design, baseline scenario, and monitoring plan and to ensure compliance of the Project Plan to the assessment criteria defined in Section 1.5.1. The objective of the verification activities was to conduct an independent assessment of the Project's initial reporting period and resulting ex-post GHG emission reductions.

Based on the review and the historical evidence collected, RCE concludes to a reasonable level of assurance that the Project's GHG assertion is free of material misstatement. The emission reductions resulting from the reporting period September 21, 2021 – September 20, 2022 can be considered in conformance with the:

- ACR Standard, Version 7.0 (December 2020)
- ACR Validation and Verification Standard Version 1.1 (May 2018)
- Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non‐Federal U.S. Forestlands v.1.3, April 2018
- Errata and Clarifications - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non‐Federal U.S. Forestlands v.1.3, January 1, 2024
- ACR Tool for Risk Analysis and Buffer Determination, v1.0
- ISO 14064-3:2006 "Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions"

Table 2 provides a summary of the Emission Reduction Tons (ERTs).

Table 2. Total ERTs

Vintage	Removal ERTs ($mtCO_2e$)	Other ERTs ($mtCO_2e$)	Total GHG Reductions and Removals ($mtCO_2e$)		Risk Buffer ($mtCO_2e$)	Final ERTs ($mtCO_2e$)
2021	72,612	1,083	73,695		11,791	61,904
2022	187,225	2,794	190,019		30,404	159,615
Total	**259,837**	**3,877**	**263,714**		**42,195**	**221,519**

Note: Totals might not sum due to rounding.

Lead Validator and Verifier Signature

Zach Eyler

Internal Reviewer Signature

Bonny Crews

APPENDIX A—DOCUMENTS REVIEWED

1. 92121_92022_Sales shapefile
2. Anew_HarvestDataRequest_WCF_09_20_21
3. Deeds from 69058 - 920029
4. DRAFT_WashburnCounty_GHGPlan_series
5. DRAFT_WashburnCounty_PDA_PDD_series
6. Management Plan From Chapter100_Background - Chapter4000_RoadandAccessPlan
7. Parcel_deeds_5_10_23 shapefile
8. Prescriptionbysale
9. SFIWICountyForestcert
10. Slips1-26
11. Slips27-51
12. soildb_WI_2003
13. TimberMartNorth_Vol 28 No 1
14. Verification_WeightConversions
15. WasburnCounty_GrowingSeasonCalc
16. Washburn County Check Cruise Table V2
17. Washburn County WI - Blue Source LLC Agreement -Fully Executed
18. Washburn_CarbonPlot_Methodology_series
19. WashburnCo_HarvestSample
20. WashburnCo_HarvestSample_numbered
21. WashburnCounty_100Yr_calcs_series
22. WashburnCounty_Boundary_09_27_22_2.shp
23. WashburnCounty_CCA_series
24. WashburnCounty_CCO_series
25. WashburnCounty_CCPJ_series
26. WashburnCounty_CCPR_series
27. WashburnCounty_CCSC_SH_series
28. WashburnCounty_FVS_Plots_03_17_2023
29. WashburnCounty_GHGPlan_series
30. WashburnCounty_GHGPlan_03_07_24
31. WashburnCounty_GROW
32. WashburnCounty_IndTreeGrowls
33. WashburnCounty_PDA_PDD_series
34. WashburnCounty_Plots_09_28_22.shp
35. WashburnCounty_Regeneration_Calcs
36. WashburnCounty_RP_ERT_HWP_series
37. WashburnCounty_RP1_MonitoringReport_series
38. WashburnCounty_RP1_MonitoringReport_01_28_25_signed
39. WashburnCounty_SHW50_series
40. WashburnCounty_SiteIndex_Calcs_series
41. WashburnCounty_SMZ_09_27_21.shp
42. WashburnCounty_Start_RP_CO2_Harv_series

43. WashburnCounty_Start_SV_CO2_Harv_series
44. WashburnCounty_Strata_09_27_2022.shp
45. WashburnCounty_STS50BA10_series
46. WCF_Encumbrances_Original
47. WCF_Parcels_Original
48. WCF_VolumeSummary&Descriptions
49. WI_Best-Management-Practices-for-Water-Quality---FR-093

APPENDIX B—LIST OF FINDINGS

Includes Corrective Action Requests, Non-Material Findings, Additional Documentation Requests, and Clarification Requests, as necessary.

Corrective Action Request, Additional Documentation Request, or Clarification Request ID#	Finding	Client response	RCE response	Client response	Additional RCE response	Client response	Additional RCE response	Open or Closed
CAR 1								
NM 1	In 'WashburnCounty_RP_ERT_HWP_03_17_2023' on the 'Actual_RP1_HWP_Step_1' tab, for Sawtimber entries bark ratio is being incorporated. MBF Scribner Short log is a volume measurement that already excludes bark, no bark ratio correction is needed.	Thank you, the formulas in columns J and L have been updated to remove the bark ratio correction. The ERT sheet has been updated along with the stats in the GHG Plan and Monitoring Report.	Thank you for making this change, it has been confirmed. This item may be closed.					Closed
NM 2	Please incorporate the appropriate bark ratio correction for pulpwood per Miles and Smith 2009 equations 7, 8, and 9 in the calculation of bark ratio on 'Actual_RP1_HWP_Step_1' of 'WashburnCounty_RP_ERT_HWP_03_17_2023'.	Column I heading has been updated to accurately reflect the 1-adjusted bark ratio correction factor by which pulpwood is multiplied.	Please see the screenshot of equation 9 to the right of this item. This screenshot is from the Miles & Smith paper green weight bark ratio correction. Please correct column I.	The bark ratio used in column I has been updated using equations 7, 8, and 9 from Miles and Smith 2009	Thank you for making this change, it has been confirmed. This item may be closed.			Closed
NM 3								
ADR 1	Please provide the soils database used in the Site Index quantification.	The soils database has been uploaded to the supportingDocs folder in the shared verification folder.	Thank you for providing this data set. It has been confirmed, this item may be closed.					Closed
ADR 2	Please provide the sampled harvest data as seen on tab ADR 2.	Provided in the early April upload.	In analyzing the conversion between in-field recorded scale slip values (cords), the verifier is having difficulty replicating the conversion to the values seen in 'Anew_HarvestDataRequest_WCF_09_20_21' (tons). What constants were used in this conversion, specifically for the species, 'Mixed Hardwood', 'Red Pine', and 'Oak' from slips 2, 8, and 22 respectively.	The landowner has provided a document outlining the various factors used (supporting Docs folder) along with an explanation for slips 2, 8, and 22. Washburn County uses weight conversations established within Wisconsin Department of Natural Resources handbook documents. These rates are static in cases where pure species products are offered. If offering mixed products, mixed hardwood in particular, custom conversion rates are calculated on a pro-rata basis of estimated cruise values per species. Each timber sale contract contains the custom rate for when we need to convert cords to tons. For slip 2, the conversion rate is 2.28 tons/cord mixed hardwood. For slip 8, the red pine conversion is 2.25. For slip 22, the oak conversion is 2.75.	Thank you for the additional information, some questions still persist: Ticket 25 - Sale 4284 says its 'Oak' in the 'Anew_HarvestDataRequest_WCF_09_20_21' document, but the scale ticket says its Red Pine. And is calculating from the ticket as if it's Red Pine. Ticket 21 - Sale 4380 says its 'Mixed Hdwd' per the data but 'Ash' per the ticket. Please clarify.	Ticket 25 - The land manager confirmed the ticket volume and species (Red Pine) is correct, and it is correct in their database. The species was inadvertantly switched to Oak when compiling the data for us. They have scanned the dataset and concluded no other species errors occured. This has been corrected in our HWP calculation, and an updated volume table provided (6_05_23 version).The ERT calcualtion workbook and associated reporting documents have been updated. Ticket 21 - The manager confirmed this was a Mixed Hdwd sale of which Ash was a component, so it was correctly calculated as a Mixed Hdwd .	Thank you for making this change, it has been confirmed. This item may be closed.	Closed
ADR 3	Please provide an equivalent 'Project 100 Year Harvest Volume' table as seen in the 'HarvestRevenue' tab of the 'WashburnCounty_100Yr_calcs_03_17_2023' document. Related, please provide equivalent Project Cash Flow tables as seen in the 'Financials' tab of the same document.	The current information provided sufficiently demonstrates a financial implementation barrier, as part of the three-prong additionality test in section B4 of the protocol. From the protocol, " When applying the financial implementation barrier test, Project Proponents should include solid quantitative evidence such as NPV and Internal Rate of Return (IRR) calculations". This NPV calculation can be found in the WashburnCounty_RP_ERT_HWP_03_17_23.xlsx workbook on the 'Financial_Barriers_Test' tab. Furthermore, the modeled project scenario only constitutes a reasonable estimate of the project scenario used to calculate ERT offset projections. The actual project scenario harvest and associated ERTs will be updated and calculated on an annual basis.	Thank you for this explanation. After review of the provided documentation, independent confirmation of values, and internal discussion, it has been determined that the provided level of analysis meets both the financial barriers test and guidance from ACR. This item may be closed.					Closed
ADR 4	Please provide the reference material to support the equations used in the Stem CO2 column AF of the 'StartDate_Tree_CO2' tab of 'WashburnCounty_Start_RP_CO2_03_17_2023'.	These calculations are done in response to the issue that inventory data is degrown to the start date and some of the RP1 harvesting was completed prior to the inventory, which leads to start date stocking lower than actual levels because the stocks removed in RP1 harvests were not accounted for. The solution to this is to estimate the RP1 harvest removal volume that occurred before the inventory and add this value back to the starting stocks. To do this we first estimate the stem CO2e for trees using the whole tree CO2e based on whether species was softwood or hardwood (column AF), then we calculate whole tree to bole ratio (column AG), which is then used to get an average Total/Stem CO2e ratio for all trees greater than 5" DBH (column AH). The value in column AH is then used in the WashburnCounty_RP_ERT_HWP_03_17_23.xlsx workbook on the 'Actual_RP1_HWP_Step_1' tab (cell Q13) where it is multiplied by the before inventory harvest removal CO2 (cell S8) and divided by the project acreage to determine the per acre removals not accounted for by the inventory, which is then added to the Total Live CO2e (tons/acre) for 2021 found on the 'Baseline_Project_40YR_CO2e' tab (cells B3 and B27). Because we don't know all the specific species that were harvested the whole tree/bole ratio is determined using generic hardwood/softwood calculations which leads to a conservative rough estimate of the unaccounted for volume.	Thank you for this explanation. It has provided clarification, and this item may be closed.					Closed
ADR 5	Please provide evidence of the 10% check cruise as required by section D.2 of the GHG Plan.	The check cruise data sheet has been provided in the Supporting Documents folder.	Thank you for this document, it has been confirmed. This item may be closed.					Closed
ADR 6	Please provide descriptions of the silvicultural prescriptions as applied by each harvest.	Prescriptions by harvest number have been added to the Supporting Documentation folder.	Thank you for this document, it has been confirmed. This item may be closed.					Closed
CR 1	In 'WashburnCounty_Start_SV_CO2_Harv_10_03_2022' on the 'InvDate' tab, what is the reference for the values in the Monthly tree growth Schedule column?	The temperature data and formulas used to derive the growth schedule is now included in the supportingDocs folder	Thank you for this document, it has been confirmed. This item may be closed.					Closed
CR 2	In comparing 'WCF_Encumberances_Original', 'WCF_Parcels_Original', and the publicly available PLSS data on the WI DNR website, there appears to be a section that is unaccounted for. There is 6,955 acres in township 41, range 13, a screenshot has been provided on the CR 2 tab. Please clarify/provide evidence of this ownership.	The landowner has provided a shapefile of the area in the screenshot that identifies the deeds at the parcel level (SupportingDocs folder). The "Deed" attribute of the shapefile corresponds to the deed PDF name in the verification folder.	Thank you for this additional information, it has been confirmed. This item may be closed.					Closed
CR 3	Are there any easements, hunt clubs, mineral rights, or other restrictions that would limit management that have not already been addressed in the GHG plan?	All easements and other harvest restrictions provided by the landowner have been addressed in the GHG plan and/or incorporated in the SMZs.	Thank you for this confirmation, this item may be closed.					Closed

CR 4	In the intersection of the '92121_92022_Sales' and 'WashburnCounty_SMZ_09_27_21' shapefiles, there are 123 acres of overlap. Please clarify how logging operations were managed to meet BMPs.	The SMZ layer was designed to conservatively cover more ground than may be necessary for the on-the-ground conditions. It therefore may not reflect on-the-ground conditions found for individual harvests. The landowner has confirmed their harvest boundaries encompass some SMZ areas, but all buffer requirements are met as evidenced by their ongoing forest certification.	Thank you for the clarification, as there have been no noted violations from the State agency, this item may be closed.					Closed
CR 5	Per the TreeData tab of 'WashburnCounty_Start_RP_CO2_03_17_2023' there are two plots that have trees recorded as logged: 120 and 237. There are 4 other plots that intersect the '92121_92022_sales' shapefile, were these plots revisited after harvest? 13, 19, 77, 210.	Plots 13, 19, 77, and 210 were revisited. The county forester confirmed there was no additional harvest activity on these plots after their establishment.	Thank you for this confirmation, this item may be closed.					Closed
CR 6	Are there any known endangered or threatened species on property that need to be accounted for in the baseline model?	There is potential for threatened and endangered species on the project area including Karner Blue Butterfly, Northern long-eared Bat, and Gray Wolf. The County has adopted a Habitat Conservation Plans which allow for management to continue in potential habitat areas as long as monitoring protocols are followed. The forest managers conduct National Heritage Inventory (NHI) checks before all land-disturbing activities. It is relatively rare for a threatened species to significantly impact harvest operations in Wisconsin, and most restrictions are seasonal so harvests are not impacted on the whole.	Thank you for this clarification, this item may be closed.					Closed
CR 7	Is this project enrolled in any other environmental asset program for non carbon benefits?	The landowner confirmed: the property is not enrolled in any other environmental asset program.	Thank you for this confirmation, this item may be closed.					Closed