VALIDATION/VERIFICATION REPORT

ACR VALIDATION/VERIFICATION OF THE NORTH FLORIDA LAND TRUST FOREST CONSERVATION (ACR722)

REPORTING PERIOD 1

Date: 11/4/2024
Version 2.1

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Project Name	North Florida Land Trust Forest Conservation
Project ID	ACR722
Reporting Period	1/27/2020 - 12/31/2021
Client	HGB & Associates, LLC
Date of Issue	11/4/2024
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Summary

North Florida Land Trust Forest Conservation (the project) is a forest conservation project utilizing the ACR Improved Forest Management (IFM) methodology. The project area encompasses 3,868.05 acres within the Northeastern Coastal Plain of Florida. The forestland is composed of a mix of hardwood bottom lands and upland forest types that has been historically part of a harvest rotation in the Northeastern Florida region known for as Atlantic Coastal Plains and Flatwoods and Florida Coastal Plains/Central Highlands.

NFLT purchased and/or received donated lands from timber companies and private landowners that were previously managed primarily for pine and pulpwood production. The hardwood forests were historically harvested based on market demands. These lands have been managed as such since they were first harvested back in the early 1900's.

The project proponent deems the project lands to have exceptional environmental benefits and have agreed to forego harvest of any kind in the future, thus preserving the integrity of these forest lands, water resources and diverse suite of native flora and fauna species. The purpose of the project is to passively manage the forestlands to ensure the viability and integrity of these mixed pine & hardwood stands that over the long term enhance water quality, ground water recharge, recreation, wildlife habitats, and native plant communities.

This report presents the results of the project's validation and initial verification to the American Carbon Registry (ACR) Standards. Its purpose is to systematically assess and report the project's conformance with the ACR standard requirements corresponding to the first reporting period from 1/27/2020 - 12/31/2021. The evaluation involved: document analysis, interviews with interested parties, relevant actors, as well as observations and measurements made directly in the field, while considering a representative sample of the project activities and sites. Validation activities included forest inventory checks, interviews with project managers, contractors, and other relevant stakeholders. The context of the surrounding landscape conditions under the baseline and project scenarios was also assessed. The scope of the verification included the ACR verification of the project's initial monitoring period to determine the project's conformance with the ACR Standard (v7.0), the applied ACR IFM Methodology (v1.3), supporting ACR Program documents, and implementation of the validated GHG Plan.

The validation and verification were performed through a combination of document review, interviews and communications with relevant personnel, as well as on-site inspections. The site visit to the project was conducted from 10/31/2022 – 11/4/2022. The verification process included several official and documented exchanges between the verifier team and the project proponents in order to gather additional information for review and for examination of compliance with all applicable criteria. These exchanges included 3 rounds of an Issues Log produced by S&A to which the project proponents were required to respond, and for which 14 Clarification requests, 7 New Information Requests, and 6 Non-Conformances and were identified. Verifiers confirmed in an email to the project proponents dated 5/7/2024 that all remaining issues were satisfied in the responses provided in the Issues Log.

S&A Carbon prepared this final combined validation & verification report and deems, with a reasonable level of assurance, that the project is in conformance with all of the requirements in the ACR Standards, without qualifications or limitations. The project has been implemented in accordance

with the validated GHG Plan over the initial monitoring period with no deviations from the described project activities in the GHG Plan or from the applied ACR methodology.

S&A Carbon is thus able to issue a positive validation opinion of the project's design as outlined in the GHG Plan dated 7/30/2024 and the projected *ex-ante* GHG emissions reductions/removals of 210,445 tCO2e over the first 20-year crediting period. S&A Carbon is also able to issue a positive verification opinion for the 35,713 tCO2e of verified GHG emissions reductions/removals, as reported in the 7/30/2024 Monitoring Report (signed 11/1/2024). The verification assessment covered the monitoring period from 1/27/2020 – 12/31/2021 and verified that the calculated GHG removals and emission reductions were achieved during the monitoring period with a reasonable level of assurance. The overall risk rating was 19.73%. Therefore, the total number of credits to be deposited in the buffer account for the initial monitoring period is 7,047 tCO2e and the total ERRs to be issued are 28,666 tCO2e.

Abbreviations

ACR	American Carbon Registry
ANAB	ANSI National Accreditation Board
BMP	Best Management Practices
CO_2e	Carbon Dioxide Equivalent
CP	Common Practice
EPA	Environmental Protection Agency
ERRs	Emission Reductions/Removals
ERTs	Emission Reduction Tons
GHG	Greenhouse Gas
HWP	Harvested Wood Products
ICS	Initial Carbon Stocks
MR	Monitoring Report
MP	Monitoring Period
NRCS	USDA Natural Resource Conservation Service
PD	Project Developer
PP	Project Participants
RP	Reporting Period
RPF	Registered Professional Forester
S&A	S&A Carbon
t	Metric Tonnes
U.S.A	United States of America
USDA	United States Department of Agriculture
VVB	Validation and Verification Body

1 Introduction

S&A Carbon (S&A) has been asked by HGB & Associates, LLC (HGB) to verify the greenhouse gas (GHG) emissions removals and reductions generated by the North Florida Land Trust Forest Conservation (the project) for Reporting Period 1. The validation/verification process is required by the American Carbon Registry's Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands (ACR IFM Methodology, v1.3). S&A validation/verification activities began on 10/5/2022. This report presents the findings from this validation/verification process.

Date Description	Date
Project Start Date	1/27/2020
Crediting Period	1/27/2020 - 1/26/2040
Reporting Period 1	1/27/2020 - 12/31/2021
Verification Start Date	10/5/2022

1.1 Project Participants

Role	Organization Name	Main Contact Information and Person
Project Proponent	North Florida Land Trust (NFLT)	Roney Gutierrez 843 W Monroe Street Jacksonville, FL 32202 904-479-1967 rgutierrez@nflt.org
Project Developer	HGB & Associates, LLC (HGB)	Brent Lowder & Glenn Lowder 10349 Carrollwood Lane, Ste 133 Tampa, FL 33618 813-299-7131 brent@hgbsolutions.com
Technical Specialist	Aster Global Environmental Solutions, Inc.	Mansfield Fisher 3800 Clermont Street NW North Lawrence, OH 44666 330-294-1242 mfisher@asterglobal.com

Entities listed above are collectively referred to as project participants (PP) throughout this document.

1.2 Description of Project

North Florida Land Trust Forest Conservation is a forest conservation project utilizing the ACR Improved Forest Management (IFM) methodology. The project area encompasses 3,868.05 acres within the Northeastern Coastal Plain of Florida. The forestland is composed of a mix of hardwood bottom lands and upland forest types that has been historically part of a harvest rotation in the Northeastern Florida region known for as Atlantic Coastal Plains and Flatwoods and Florida Coastal Plains/Central Highlands.

NFLT purchased and/or received donated lands from timber companies and private landowners that were previously managed primarily for pine and pulpwood production. The hardwood forests were

historically harvested based on market demands. These lands have been managed as such since they were first harvested back in the early 1900's.

The project proponent deems the project lands to have exceptional environmental benefits and have agreed to forego harvest of any kind in the future, thus preserving the integrity of these forest lands, water resources and diverse suite of native flora and fauna species. The purpose of the project is to passively manage the forestlands to ensure the viability and integrity of these mixed pine & hardwood stands that over the long term enhance water quality, ground water recharge, recreation, wildlife habitats, and native plant communities.

1.3 Validation/Verification Objectives

This is the Project's ACR validation and initial verification. This will be a combined project validation and full initial verification, including a site visit to assess the Project's conformance with the ACR criteria outlined below, corresponding to the first reporting period from 1/27/2020 - 12/31/2021.

The objectives of validation are to evaluate:

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

The objectives of verification are to evaluate the following:

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

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

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

1.4 Validation/Verification Scope and Criteria

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

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

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

- Physical infrastructure, activities, technologies, and processes of the GHG project;
- GHG SSRs within the project boundary;
- Temporal boundary;
- Baseline scenarios;
- Methods and calculations used to generate estimates of emissions and emission reductions/removal enhancements;
- Original underlying data and documentation as relevant and required to evaluate the GHG assertion;
- Process information, source identification/counts, and operational details;
- Data management systems;
- Roles and responsibilities of project participants or project proponent staff;
- QA/QC procedures and results;
- Processes for and results from uncertainty assessments; and
- Project-specific conformance to ACR eligibility criteria.

The criteria for the offset validation and verification services are:

- The American Carbon Registry Standard, v7.0, December 2020
- The ACR Validation and Verification Standard, v1.1, May 2018
- The Improved Forest Management (IFM) Methodology for Non-Federal U.S. Forestlands, v1.3, April 2018
- Errata and Clarifications for ACR IFM Methodology v1.3, January 2024
- ACR Tool for Risk Analysis and Buffer Determination v1.0
- ISO Standards 14064-2 and 14064-3, 2006

1.5 Materiality & Level of Assurance

The validation/verification team must state with reasonable assurance that discrepancies between GHG emissions reductions/removal enhancements claimed by the Project Proponent and estimated by the VVB be immaterial (less than the materiality threshold of +/- 5%). The equation below is used to calculate the percent error in the GHG removals/emission reductions assertion (v7.0 Standard, Eq 1).

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

1.6 Audit Team

Role	Name
Lead Validator/Verifier	Bill Stack
Technical Reviewer	Alexa Kandaris
Biometrician	Elizabeth McGarrigle
Technical Experts	Marty Duffany, Stacy Birch (under observation)
Site Visit Team	Pete Clark, David McMath
Project Manager	Kyle Silon

2 Audit Process and Methodology

S&As audit included the following activities:

2.1 Desk Review

An initial kickoff call was held with the PP on 10/5/2022, signaling the start of the validation/verification services. The primary focus of this meeting was to discuss and clarify the project's recent inventory and its associated carbon stock calculations in preparation for the upcoming site visit (10/31/22). After the site visit was completed, a secondary planning meeting was held with the PP on 6/1/2023. The project team and verifiers discussed initial findings from the site visit and desk review of submitted documents, targeting aspects of the project and supporting information that might affect the evaluation. Meeting agendas and minutes were completed for both calls and provided to the PP for review following each meeting.

A draft GHG Plan was provided to the validation/verification team at the project start. This initial document had numerous sections missing and required significant revisions. The PP updated and provided a complete draft GHG Plan along with the other requested project documents in April 2023. Verifiers reviewed the revised GHG Plan and assessed the eligibility criteria required to design, measure, and monitor the project to the requirements of the ACR Standards and IFM Methodology and confirmed that these requirements were met. The Validation/Verification Plan was updated and sent to the PP on 7/11/2023.

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

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

2.2 Site Visit

A site visit was conducted by David McMath and Pete Clark from 10/31/2022 through 11/4/2022. An opening meeting was conducted on 10/31/2022. Attendees of the site visit were as follows:

Attendees	Company	Role	Attend Opening Meeting	Attend Field Sampling
David McMath	S&A Carbon	Site visit team	X	X
Pete Clark	S&A Carbon	Site visit team	X	X
Brent Lowder	HGB	Project Developer	X	X
Glenn Lowder	HGB	Project Developer	X	X

During the kick off meeting, the objectives of the site visit and overall validation/verification process were presented by the verification team. Other items discussed onsite included the PP's qualifications, inventory methodology specifications, QA/QC procedures, and site visit logistics & safety, personnel and vehicles/transport, and schedules. Verifiers noted selected plot samples would be measured, however, the verification of the inventory's project stocks (i.e., the statistical t-test) would not be completed during the site visit as the PP's project stocks estimate were still under review. Based on the outstanding issues with the project stock calculations, both the PP and VVB teams agreed the verifiers would conduct the site visit as planned (assess project boundaries & inventory methods and measure plot carbon of selected plots) and then conduct the t-test at a later date when the project's carbon calculations issues were clarified and resolved. Both teams acknowledged that another site visit might be necessary depending on the t-test results and other verification needs (e.g., potential major changes to project/strata stocking, project boundary checks). A site visit closing meeting was postponed until verifiers were reasonably assured these items were addressed and/or resolved.

The planned sampling methods for the site visit were completed as described. As mentioned, the PP's plot carbon values were still under review and to reduce the likelihood of a subsequent site visit if the t-test results did not pass once plot carbon issues were resolved, verifiers chose to sample an additional 15 plots beyond the minimum 16 plots. The carbon stocks for all Tier 1 plots and 15 of the 16 plots for Tier 2 were measured during the site visit, totaling 31 plots. Site visit activities also included collecting GPS data (plot center, project boundaries); observing and documenting the forested conditions within the project area (e.g., species composition, age class, canopy cover); and discussions with the PP on QA/QC processes around the inventory data collection methods. See the verifiers' Sampling Plan and Data Check Log for further details.

After the site visit, verifiers provided Issues Log findings to the PP. After two rounds of Issues Log exchanges between the VVB and the PP, project stock calculations and other findings were resolved on 2/27/2024 (e.g., plot allocation, project boundaries). Verifiers ran their site visit verification data of the 16 plots (all Tier 1 plots) through the paired t-test (two-tailed). The analysis showed that the project's inventory was verifiable at a confidence interval of 90% (i.e., the means were the same, p=0.20). An e-mail was sent on 2/27/2024 notifying the PP that the project's inventory passed the t-test and the site visit was formally brought to a close. Based on the desk review process, verifiers data

checks, stakeholder interviews and the Issues Log findings, verifiers were reasonably assured the project boundaries were complete and accurate and another site visit would not be necessary.

2.3 Quantitative Review (only required for verification)

The data and information supporting the PP's GHG assertion for this Project is based on historical records (forest inventory data) and future projections (modeled tree growth). To verify this assertion, S&A conducted various quantitative analyses of the project and baseline carbon stocks, covering the relevant carbon pools quantified by the PP, and the inputs used in the calculation of the projected *ex-ante* emission removals and reductions over the first 20-year crediting period as well as the actual *ex-post* emission removals and reductions for this initial reporting period (1/27/2020 - 12/31/2021). The audit team implemented a detailed review of all aspects of the carbon stock modeling, including the stratification process, forest inventory design and specifications, measurement techniques used by the PP's inventory crew, review of the species in the inventory and the correct assignment of volume and biomass equations, and checks to confirm that modeled growth used to project carbon stocks forward have been calculated and applied correctly. The modeling methods were assessed to ensure an approved model was used, that it was appropriately calibrated for the region, and inventory data flow through the modeling system was reviewed.

The reported ex-post GHG emission removals and reductions were confirmed by tracking all components of the PP's emission reduction calculation workbooks. This included checks that the entries for initial carbon stocks, confidence deduction, baseline stocks, baseline harvested wood products, and the reversal risk determinations, leakage and uncertainty are all entered and calculated correctly from their computed sources, as well as confirming the accuracy of their sources. The entire inventory treelist was independently recalculated by the verifiers to estimate the project's carbon stocks and the results were compared to the PP's reported values. This recalculation process includes a complete quantitative check of the PP's inventory data on a plot-by-plot level to verify PP's project stock calculations were done accurately and completely to comply with the ACR Standard. Uncertainty and associated deductions were also independently calculated by the verifier.

For projects where plot sampling is required during verification, ACR provided guidance stating VVBs shall resample a minimum of 5% of the project's plots. For sampling to pass verification, all strata need to be represented in the sample selection and statistical agreement must be attained between the verifier's and project's plot carbon values using a t-test at 90% confidence interval. This minimum sampling intensity was considered in the selection of sample plots to be measured by the verifiers along with allocation of sample plots among individual project strata based on risk. As mentioned, due to the uncertainty of the project carbon calculations prior to the site visit, verifiers increased the minimum sample size to 16 (5% of the total number of plots = 10 plots).

All trees within the selected sample plots were re-measured by the verifiers including tree diameters (DBH) & limiting distances (i.e., trees in/out of the plot), tree heights, species identifications, missing volume, and tree status assessments (live/dead) were independently measured using tools identical or comparable to those used by the PP.

Inventory re-measurement was confirmed to meet the ACR recommendations and all measurement methods were confirmed to be consistent with the PP's inventory specification. Carbon per plot and across the project area was calculated from the sampled plots and compared to the PP's inventory for the same plots. The verifier calculations and the PP's calculations were entered into a t-test worksheet,

using the paired plot method (two-tailed t-test, at the 90% confidence interval), and confirmed to meet the statistical standards expected by ACR for projects that require independent re-measurement for verification.

2.4 Interviews

The following is a list of the people interviewed as part of the validation/verification. The interviewees included those people directly, and in some cases indirectly, involved and/or affected by the project activities. The training and qualifications of the PP team was confirmed by referencing bios for the team on their associated websites on 10/20/2022 (https://www.asterglobal.com/) and/or during interviews with Project Participants throughout the validation/verification process.

Date	Name	Title
Throughout the verification	Brent & Glenn Lowder	HGB Associates, LLC; Project Developer
Throughout the verification	Mansfield Fisher & Justin Ziegler	Aster Global Environmental Solutions Inc.; Technical Consultants (AFOLU Validation and Verification Manager and Biometrics and Quantitative Analysis Manager, respectively)
1/26/2024	Carlton Scott	Florida Forest Service; County Forester – Clay County
1/30/2024	Gabriel Burns	ACR; Technical Manager
4/18/2024	Andrew Usina	Florida Forest Service; County Forester – St. Johns County
4/19/2024	Sandesh Shrestha	Aster Global Environmental Solutions Inc.; Technical Consultants (Forester / GIS Remote Sensing Specialist)
4/22/2024	Robin Holland	Florida Forest Service; BMP Program Manager
4/22/2024	Michelle R. Pasawicz	Florida Fish and Wildlife Conservation Commission; Manatee Management Program Coordinator- Imperiled Species Management Section
4/22/2024	Anthony Grossman	Florida Fish and Wildlife Conservation Commission; Landowner Assistance Program Administrator

2.5 Findings

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

2.6 Audit Schedule

The following table summarizes the key audit milestones:

Verification Activity	Proposed Date	Actual Date
Kick-off Meeting	10/5/2022	10/5/2022
Site visit	10/31-11/5/2022	10/31-11/5/2022
Secondary Planning Meeting	---------	6/1/2023
S&A Carbon submits issues log v1.0	7/24/2023	7/14/2023
HGB response to issues	8/11/2023	8/8/2023
S&A Carbon submits issues log v2.0	9/1/2023	1/29/2024
HGB response to issues	9/25/2023	3/15/2024
S&A Carbon submits issues log v3.0	10/17/2023	4/12/2024
HGB response to issues	11/7/2023	4/17/2024
S&A Carbon closes out issues log	11/15/2023	5/7/2024
S&A drafts validation/verification documents	11/30/2023	5/11/2024
S&A Carbon submits validation/verification report for Technical Review	12/7/2023	5/18/2024
Closing Meeting; S&A Carbon submits validation/verification report for TC review & approval	12/11/2023	5/29/2024
S&A Carbon submits final validation/verification documents to ACR	12/12/2023	5/31/2024

2.7 Validation Activities

The validation and concurrent verification were performed through a combination of document review, interviews and communications with relevant personnel, as well as on-site inspections. The site visit to the project area was conducted from 10/31/2022 through 11/4/2022 within northeastern Florida. The validation/verification process included several official and documented exchanges between the validation/verification team and the project proponents to gather additional information for review and for examination of compliance with all applicable criteria. These exchanges included three rounds of an Issues Log produced by S&A, for which 14 Clarification requests, 7 New Information Requests, and 6 Non-Conformances were identified. Verifiers confirmed in an email to the project proponents dated 5/7/2024 that all issues were resolved in the Issues Log.

2.8 Eligibility Requirements

The verifiers assessed the project against the eligibility criteria of the ACR Standard as well as the applicability conditions required by the ACR IFM Methodology and determined the project to be ACR eligible and applicable to the ACR IFM Methodology. The project applied an ACR approved methodology, Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands, v1.3. The project was found to meet the eligibility requirements of the ACR Standards in terms of its start date, minimum project term, crediting period length, land eligibility & title/ownership, adherence to natural forest management requirements and the permanence of the generated GHG emission removals and reductions. It was also found to meet the applicability conditions of this

methodology in terms of land ownership type, legality of harvesting activities, types of project activities and natural forest management criteria.

The reporting period length for RP1 (1/27/2020 - 12/31/2021) is less than two years and meets the eligibility requirement. The project start date (1/27/2020) is after 11/1/1997 and is therefore considered an eligible project. The start date is also the same date as the beginning of the first crediting period. The project did not achieve validation against the ACR standards within 3 years of the project start date but ACR provided deviation request from the PP to allow an extension. The minimum project term stated in the GHG Plan is 40 years as required by the methodology. The Crediting period is 20 years, consistent with the applied methodology.

The project is an IFM project type. The PP asserts the project area is greater than 10% forest cover (live trees) for this initial reporting period to comply with the ACR Standard eligibility requirement (A.3). Based on reviewing recent aerial imagery (NAIP FL 2021) and October/November 2022 site visit observations, verifiers are reasonably assured the project area is covered by greater than 10% forestland. The verifiers are also reasonably assured that the project area is located on private owned lands within Florida based on aerial imagery assessments, deeds and tax maps. The current project activities do not involve commercial harvesting.

The project area's forest is composed of 100% native species. The project area contains 3,868 acres primarily within the Atlantic Coastal Plain & Flatwoods forest types consisting of sweetgum, cypress, red maple, black gum, and water oak. There is a minor portion within the Florida Coastal Plains Central Highlands forest type containing mixed pine and hardwoods species. The project activity doesn't involve any use of non-native species. The project area contains seven strata (NFLT Preserve management areas) that consist of gently sloped forested uplands and flat forested wetlands. Numerous water resources are present in many of the Preserves with some abutting large river systems (e.g., Sixmile Creek).

In accordance with the ACR IFM Methodology, the PP's risk assessment for Reporting Period 1 uses the *ACR Tool for Risk Analysis and Buffer Determination* (v1.0), which was determined to have a risk rating of 19.73%. Verifiers completed a review of the percent contributions for each risk category and found the individual risk ratings reasonable, appropriate, accurate and well supported with documentation to justify the associated risk ratings and conforms with the ACR descriptions for each risk type. In total, 19.73% of the gross emission reductions will be deposited into the ACR buffer account. This deduction is made to the gross ERT calculations produced by the PP's to determine the total tradeable balance of ERTs generated by the project during this initial reporting period.

The table below presents the verifiers' findings pertaining to the Project's Permanence Risk Rating, following the guidance in the *ACR Tool for Risk and Analysis and Buffer Determination (v1.0)*.

Risk Type	Conform ?	Finding	GHG Plan	VVB Check
Financial	Y	Default	4%	4%
Project Management	Y	Default	4%	4%
Social/Policy	Y	Default	2%	2%
Conservation Easement Deduction	Y	CE recorded on 1/30/2020	-0.27%	-0.27%

Risk Type	Conform ?	Finding	GHG Plan	VVB Check
Fire	Y	High Risk	4%	4%
Diseases and Pests	Y	Default	4%	4%
Levee Failure & Water Table Changes	Y	Default	0%	0%
Other Natural Disaster Events	Y	Default	2%	2%
Total Risk			19.73%	19.73%

2.9 Additionality

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

Section B.5 of the GHG Plan offers a reasonable definition of the baseline harvest scenario, which the PP asserts is the common practice harvesting regime in the region for similar types of landowners and forest types. Common silvicultural practices include clearcutting (even-age management in the Uplands) and thinning (forested wetlands) in which both treatments assume natural regeneration. Specific baseline silvicultural harvest prescriptions are described in Section E.1 of the GHG Plan and the baseline modeling workbooks.

The PP's common baseline forest management practices and minimum merchantable harvest volume threshold (520 ft^3/ac) were based on input from a Florida registered professional forester (University of Florida , Austin Cary Forest Manager, Scott Sager). Verifiers confirmed these practices and operational harvest volume for financial feasibility are reasonable and align with regional silvicultural practices and harvesting on private lands based on discussions with State foresters in northeastern Florida; internet searches of regional silvicultural practices; and professional experiences in working in this area.

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

The description of applicable National, State, and local laws and regulations in the GHG Plan was found to consider all applicable laws and regulations for both the project and baseline activities. Applicable legal constraints were found to be adequately incorporated into the modeled baseline harvest scenario, and the verifiers are reasonably assured all applicable laws and regulations have been considered in addressing the Regulatory Surplus Test (see Section E1 of the GHG Plan).

During the verification process, verifiers did conduct additional data checks on compliance with Florida's Silvicultural Best Management Practices, specifically in delineating and applying the required stream management zones, and Federal and State endangered/threatened species laws and

regulations. As noted above, the baseline model accurately and conservatively applied these legal constraints to the harvest scenarios. Further details are provided in the verifier's Issues Log (items 22 & 27) and Sampling Plan.

Verifiers also reviewed conservation easements (CE) within the project area to assess that any legally binding elements were included in the baseline constraints. There is only one conservation easement within the project area: Rideout Point CE which encompasses the entire Black Creek Preserve 2 area (recorded 1/30/2020). As the CE has not been in place for greater than a year prior to the start date (1/27/2020), per the ACR Standard (A.4.2), any required CE management restrictions are not required to be incorporated into the baseline model's legal constraints. For further details see the Issues Log (23-5).

Verifiers are reasonably assured the project and its associated project activities, exceed common practice in this region of northeastern Florida as NFLT's forest management plans for the project area do not include any harvesting. The project activity will increase carbon stocks by maintaining and continuing to grow the existing forest biomass, which will result in increasing GHG emission reductions/removals over the project period.

The PP has elected to demonstrate there are financial barriers to implementation of the project activities and adherence to the ACR Implementation Barrier Test for additionality. Specifically, the PP asserts the landowners face limited access to financial capital, in the absence of carbon project income, that would prevent them from implementing the project activities. The PP states in the GHG Plan (C.3) the project scenario does not yield equivalently high returns as the maximized NPV in the baseline case.

The verifiers were provided with a Net Present Value (NPV) financial analysis for both the baseline and with project scenarios that accounts for all costs and revenues from these scenarios (*NFLT_NPV_Analysis_V3.1_20240416)*. In this analysis, the PP used a 5% discount rate, which was based on private non-industrial ownership and complies with the specifications in the IFM Methodology (C.1, Table 1). Required inputs for the project NPV calculation were based on the 2021 timber inventory, growth and yield under a range of silvicultural treatments, stumpage prices for wood products, hunting lease revenues, and other management costs (e.g., property taxes and maintenance costs). Verifiers found these inputs to be reasonable, appropriate, accurate and well supported.

Upon review of the NPV analysis, verifiers confirmed the project activity without carbon revenue is expected to generate an NPV substantially lower than the NPV maximization scenario of the baseline model, thus demonstrating the financial barrier of the implementation of the project. Based on this NPV analysis and stakeholder interviews, verifiers are reasonably assured the project has met the financial barrier test.

2.10 Permanence and Risk Mitigation

The project's GHG Plan outlines a risk assessment conducted in accordance with the *ACR Tool for Risk Analysis and Buffer Determination*. Percent contributions for each risk category have been applied based on guidance in the tool. All the categorical risk ratings were applied consistent with the Tool's method. All risk ratings were based on the default values except for fire, which had a high-risk rating of 4%. Verifiers concur with this assessment and the applied fire risk rating after reviewing the USFS Wildfire Hazard Potential of the project area (https://www.firelab.org/project/wildfire-hazard-

potential). A partial Conservation Easement Deduction was appropriately applied given acreage impacted (CE recorded January 30, 2020 for Black Creek Preserve 2). Verifiers also confirmed the PP's assertion that the project is not located in a region with the presence of an epidemic disease or infestation. Verifiers confirmed the PP's total risk rating of 19.73%.

In total, 19.73% of the gross emission reductions will be deposited into the ACR polled buffer account. This deduction is made to the calculated gross ERT calculations generated by the project to determine the total tradeable balance of ERTs generated by the project over the initial reporting period.

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

2.11 Baseline

As mentioned previously in section 2.9, the common silvicultural practices in the region for the private non-industrial landowners with the project's area forest types are based on even-age management (clear cutting uplands) and selective thinning in forested wetlands. Verifiers confirmed these practices through discussions with the PP (e.g., 4/3/2024 model review call), Florida State foresters; through the verification team's professional work experiences in the region; internet searches pertaining to common silvicultural practices in northeastern Florida; and site visit observations within and near the project area.

The baseline (and project) on-site carbon stocks found on the project area were determined through a forest inventory implemented by hired contractors during the Spring of 2020 and 2021. The inventory design employed a sample of 198 fixed-radius plots (double nested) installed on a systematic grid across the project area. As described in the GHG Plan (Section A.4), the project area was stratified by NFLT management units (i.e., seven strata- Preserve areas). The verifiers found the project's stratification methods to be logical, accurate and reasonable approach and the inventory methodology to follow standard industry practices.

Growth and yield projections were based on the US Forest Service Forest Vegetation Simulator (FVS), Southern (SN) variant. FVS is identified as an appropriate model in the ACR IFM methodology applied by the project. For modeling, the plots were run within FVS as individual stands. FVS was calibrated to the conditions of the project area and surrounding region utilizing the variant, National Forest code, Ecological Unit Code, and plot level site index values. Verifiers' check of site index through the USDA Soils data found the PP's estimate of site index to be reasonable and conservative.

The inventory tree list was grown forward for 5 years in FVS using a no-management let grow prescription to determine an annual growth increment for diameter at breast height and total height to estimate the beginning of reporting period stocks. These tree-specific annual growth rates were used to degrow the initial inventory data to the start date and were used to estimate the end of

reporting period stocks. Original inventory species, decay class and any missing biomass were subsequently included in the start date treelist. Standing dead trees were not adjusted as they were assumed to remain static from start date to inventory date. The estimates for baseline carbon stocks utilized 5-year FVS growth increments to project stocks forward over the crediting period.

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

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

2.12 Leakage

According to the ACR IFM Methodology, there may be no leakage beyond *de minimis* levels through activity shifting to other NFLT lands owned outside the project area. If the project decreases wood product production by greater than 5% relative to the baseline then the Project Proponent and all associated landowners must demonstrate there is no leakage within their operations (i.e., on other lands they manage/operate outside the bounds of the ACR carbon project).

As described in the GHG Plan (E.3), quantification of leakage is limited to market leakage as there is no activity shifting leakage as NFLT has no planned commercial harvesting operations on the NFLT managed lands (per stakeholder discussions and supported in the existing forest management plans). Market leakage was determined by quantifying the merchantable carbon removal in both the baseline and project scenarios. The project scenario is not expected to produce any appreciable wood volumes, thus no project activity wood products were assumed to be generated.

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

2.13 Monitoring Requirements

Section D of the GHG Plan outlines the project's monitoring plan. All appropriate data and parameters to be monitored over the life of the project are outlined including details on the unit of measurement for the data/parameter, a description of the parameter, the data source used, the measurement methodology, monitoring frequency, values applied, procedural and QA/QC references, the purpose of the data and the calculation method. The monitoring plan also indicates that each reporting period the PP will sign and submit to ACR the required attestations confirming: the continuation of the project activities; that ownership of the project area remains clear and uncontested; and a disclosure of any negative environmental or community impacts and plans to mitigate, if applicable (Validation & Verification Standard, 6E). These attestations have been included in the signed Monitoring Report for this initial reporting period.

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

QA/QC procedures have been established as part of the monitoring plan and are outlined in section D1 of the GHG Plan and Section 2 of the SOP (Carbon Cruise Protocol). Both forest and desk-based QA/QC procedures are established. The stated desk QA/QC procedures also focus on ensuring that all data is accurately and consistently collected and appropriately managed and maintained, and that all subsequent calculations of the data that are incorporated into the ERT issuance are correct. A registered professional forester reviews data collection and carbon calculation methods and processes.

Verifiers uncovered some minor issues during the site visit sampling such as differences in tree heights and DBH. These differences were not systematic and likely the result of complexities of individual trees (e.g., irregular diameters). Overall, these were relatively minor discrepancies, the verifiers found no reason to further question the implementation or effectiveness of the established QA/QC mechanisms.

2.14 Community and Environmental Impacts

As part of the GHG Plan, ACR requires all projects to prepare and disclose an environmental and community impact assessment. Section F1 of the project's GHG Plan outlines the Community and Environmental Impact Assessment addressing the requirements of the ACR Standard.

The project activity is improved forest management. The landowner's forest management practices represent a significant improvement in carbon storage and conservation value when compared to

private non-industrial forestlands in the region that emphasize higher financial return and management regimes such as clearcutting. The project activity will increase carbon stocks by maintaining existing forest biomass and eliminating harvests over the project period resulting in both, above and below ground, live biomass. This change in forest management is significantly different than common practices of neighboring private forest owners in this region.

No formal stakeholder consultation was conducted in advance of the project, nor was any required because the Project Area is privately held property. As the project area is privately owned by NFLT, no communities or other stakeholders are affected by the project activities, there is not a detailed community consultation and communications plan. The GHG Plan indicates that the project is not a community-based project. In Section F1 of the GHG Plan the PP did, however, discussed the project's development plans with the Directors of the Hunt Clubs and the St. Johns River Water Management District's Board of Directors; all agree there are only likely positive environmental and community benefits as a result of the project.

As noted within the Preserves' forest management plans, one of the long-term objectives is to preserve wetland habitats and water quality. The GHG Plan (Section F1) provides a general assessment of the project's environmental risks and impacts, covering the relevant factors outlined in the standard including climate change mitigation and adaptation; biodiversity; air/soil/water/ozone quality; and natural habitat protection/conservation/restoration. Impacts have all been categorized as positive except for ozone quality which has been rated as neutral; verifiers agree with all the PP's impact determinations. As such, there is no need to describe how negative impacts will be avoided or minimized.

Monitoring of the risks and impacts is covered in sections F1 & D1 of the GHG Plan which gives an outline of monitoring activities including inventories (forest measurements), calibrations of forest growth and yield modeling, and management activities and plans. Annual forest management monitoring is completed by the NFLT management staff or hired contractors, which includes monitoring the general health and condition of the forest through the course of normal management activities including road, recreation, ecological, and educational projects and practices. Verifiers find these monitoring methods are deemed sufficient to meet the requirements of the ACR Standard (Chapter 3). The GHG Plan (F1) also includes a description on how the positive impacts contribute to the SDGs as required.

2.15 Stakeholder Comments

The GHG Plan asserts that stakeholder comments are non-applicable. The Project Proponent is a private forestland owner and adhere to their respective internally agreed upon practices of project consultation and notification on associated decision making affected by the project activity. NFLT has an internal Board of Directors that guides the direction of the organization, policies, and management decisions. The GHG Plan indicates that the project is not a community-based project. The verifiers agree with this determination considering the project ownership and decision-making management system.

2.16 Validation Conclusion

During the validation assessment the verifiers identified 14 Clarifications, 7 New Information Requests, and 6 Non-Conformances. All audit findings were responded to and addressed to the satisfaction of

the verifiers. Once all identified issues were adequately resolved, S&A Carbon drafted this final combined validation & verification report. After reviewing the final GHG Plan (7/30/2024) and all supporting documentation, the verifiers concluded with a reasonable level of assurance that the project is in conformance with the applicable criteria and requirements of the ACR Standards listed in Section 1.4. The findings in this report represent the final determinations of the project's conformance with the standard criteria included in the scope of this validation audit. S&A Carbon is thus able to issue a positive validation opinion of the project's design as outlined in the final GHG Plan and the projected *ex-ante* GHG emission removals and reductions of 210,445 tCO2e over the first 20-year crediting period.

3 Verification Activities

3.1 Project Implementation Status

As previously described, the project's initial verification took place concurrently with the project's validation. The verifiers determined the project activities were implemented over the initial reporting period corresponding to the dates 1/27/2020 - 12/31/2021 in accordance with the project design established in the GHG Plan. The PP submitted a completed copy of the Monitoring Report (MR) that provides the information required in the ACR monitoring report template. The verifiers are reasonably assured there were no changes to the landowner, project area or inventory over the reporting period, and estimates of the current on-site carbon stocks based on the inventory data are provided. There was no commercial harvesting over the initial reporting period with no reported carbon stored long term in harvested wood products. Only one project deviation occurred during the initial reporting period: a formal deviation request from the PP to ACR for extension of the required ACR Standard for projects to be validated within a 3-year period, which was approved based on discussions with the PP.

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

Project-level live carbon stocks were derived by inputting the inventory tree list into FVS and calculating the total project stocks of the inventory tree list using Jenkins biomass equations (as per the ACR IFM methodology). Verifiers concur with this approach as this process ensures consistency among the reported project and baseline stocks, the latter of which is also derived by using the inventory tree list to grow and harvest the baseline stocks for each period in FVS.

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

3.2 Data-Checks & Materiality

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

SSR (rank)	Data reviewed Checks performed	Reported (PP) tCO_2e	Calculated (VB) tCO_2e	Dis-crepancy tCO_2e	Impact on misstatement/ conformance
Rank 1 Sum of Project stocks; end of RP (CP,TREE,t, CP,DEAD,t, CP,HWP,t, GHGP,t)	2020 Inventory, volume and biomass estimates, grown modeling results, grown tree list. Model appropriateness and use. Data systems. Checks of accumulations and correct transfer to Monitoring Report	330,569	330,576	7	**Impact on OMM**
Rank 2 Sum of Project stocks; beginning of RP (CP,TREE,t, CP,DEAD,t, CP,HWP,t, GHGP,t)	2020 Inventory, volume and biomass estimates, grown modeling results, grown tree list. Model appropriateness and use. Data systems. Checks of accumulations and correct transfer to Monitoring Report	305,717	305,723	6	**Impact on OMM**
Rank 3 Sum of Project stocks; Inventory (CP,TREE,t, CP,DEAD,t, CP,HWP,t, GHGP,t)	2020 Inventory, volume and biomass estimates	301,892	301,898	6	**Impact on OMM**
Rank 4 20-Yr Average Baseline stocks (live and dead tree CO2e) CBSL,AVE (total)	Monitoring Report and supporting modeling documents. Model appropriateness and use. Data systems. Checks of accumulations and correct transfer to Monitoring Report.	240,938	240,938	0	**No impact on Materiality**

Rank 5 Emissions Reduction at t (before buffer deduction) (CACR,t)	Monitoring Report Checks that all PP entries are correct. Check sources. Checks that calculations within the worksheet are correct. Calculation check uses PP values.	35,713	35,713	0	**No impact on Materiality**
Rank 6 Baseline Harvested Wood Products (CBSL,HWP,t)	Monitoring Report, supporting worksheets Model results, HWP worksheet. Confirm model projections and sums. Correct use of appropriate mill efficiencies, product classes and long-term storage factors.	28,266	28,266	0	**No impact on Materiality**
Rank 7 Market Leakage Discount Factor (LK)	Monitoring Report, supporting documents.	23,776 (40%)	23,776 (40%)	0	**No impact on Materiality**
Rank 8 Buffer Credits and Risk Rating (TBt)	Monitoring Report, calculation workbooks, supporting worksheets Checks that all PP entries are correct. Check risk rating and calculations have been calculated correctly.	7,047 (19.73%)	7,047 (19.73%)	0	**No impact on Materiality**
Rank 9 HWP Project (CP,HWP,t)	Monitoring Report, supporting worksheets On-site observations, GIS review, interviews with the PP. Checks of mill receipts and HWP storage calculations. Correct use of appropriate mill efficiencies, product classes and long-term storage factors.	0	0	0	**No impact on Materiality**

Rank 10 Total Uncertainty (UNCt)	Monitoring Report supporting worksheets	0 (6.6%<10%)	0 (6.6%<10%)	0	**No impact on Materiality**
	Use PP data for 2020 inventory stocks; checks the calculation of total uncertainty was done correctly.				
Comment: Below 10% threshold, so total uncertainty is zero.					

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

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

$$\text{Percent error} = \frac{[35{,}713 - 35{,}728] \times 100}{35{,}728} = 0.042\%$$

Project ERTs – Verifier ERTs (tCO2e)	Verifier ERTs (w/o buffer deductions) (tCO2e)	Calculated Materiality %
15	35,728	0.042%

The materiality check was carried out according to ACR guidance using the equation above. The verifiers independently calculated the reporting period ERTs using internal derived carbon source values and the ACR ERT workbook (35,728 tCO2e). The verifiers calculation of ERTs resulted in a slightly higher value than the PP's ERTs estimate (15 tCO2e). The Materiality Calculation shows an error of 0.042%. Thus, the project is less than the 5.0% materiality threshold.

3.3 Verification Conclusion

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

After review of all project information, procedures, calculations, and supporting documentation, S&A confirms that Project reporting is accurate and consistent with all aforementioned criteria and requirements of the ACR Standards. S&A confirms all verification activities, including objectives, scope and criteria, level of assurance, and project documentation adhere to the ACR Standards. S&A concludes without any qualifications or limiting conditions that the Project meets the requirements of the ACR Standards.

S&A has verified the PP's GHG assertion of **35,713 tCO2e** for the Reporting Period of 1/27/2020 to 12/31/2021. S&A has also verified removals and other ERRs, which is summarized below for this reporting period. Removals are calculated based on equation 24 within the *ACR Errata and*

Clarifications v1.3 (April 2022). They are defined as "*The mass of GHGs removed from the atmosphere over a specific period relative to an approved baseline. In the context of this methodology, removals are carbon stock changes resulting in sequestration attributable to the with-project scenario".*

ALL GHG PROJECTS		AFOLU & GEOLOGIC SEQUESTRATION PROJECTS ONLY			
VINTAGE	TOTAL ERRS (VI.4)	BUFFER POOL / RESERVE ACCOUNT CONTRIBUTION (VI.5, IF APPLICABLE)	NET ERRS (VI.6, IF APPLICABLE)	REMOVALS SUBSET (IF APPLICABLE)	EMISSION REDUCTIONS SUBSET (IF APPLICABLE)
2020	17,223 mt CO2e	3,398 mt CO2e	13,825 mt CO2e	7,191 mt CO2e	6,634 mt CO2e
2021	18,490 mt CO2e	3,649 mt CO2e	14,841 mt CO2e	7,720 mt CO2e	7,121 mt CO2e
Totals	**35,713 mt CO2e**	**7,047 mt CO2e**	**28,666 mt CO2e**	**14,911 mt CO2e**	**13,755 mt CO2e**

Appendix A: Reference List

Project Proponent Documents & References

Description	Filename
Listing	ACR Account Manager DeFoor 11212022.PDF
	acr-project-listing-form-v2-NFLT.docx
ACR Guidance	ACR Guidance on Applicable Version of ACR Standard.pdf
	ACRGuidance_20240301_Hazard Plots.pdf
GHG Plan	North Florida Land Trust IFM GHG PLAN_20240730.pdf
Monitoring Report	ACR722 NFLT-monitoring-report-template_20240730.docx
	19007.01_NFLT_RP1_Monitoring Report Appendix_20240722
Property Deeds-Ownership	29413-A Executed Documents 134 acre.pdf
	29413-A_29413-A Deed_DEED_20191206.pdf
	29413-B Executed Docs 329 acres.pdf
	Black Creek Preserve 1/MasterCommitment.pdf
	Black Creek Preserve 1/NFLT_Signed Deed_South Doctors Lake.pdf
	Black Creek Preserve 2/SaleDonationTitlePolicy.pdf
	Black Creek Preserve 2/SandridgeSaleDonationRecordedDeeds.pdf
	Carter Recorded Deed.pdf
	Clay County 301 Land Deed.pdf
	Closing Deed.pdf
	Little Rain Lake - Milam/Gomie (part of Little Rain Lake)/Gomie_title_settlementstatement.pdf
	Little Rain Lake - Milam/Gomie (part of Little Rain Lake)/GomieLTD_DEED.pdf
	Little Rain Lake - Milam/Little Rain Lake/ALTA 2006 Commitment.pdf
	Little Rain Lake - Milam/Little Rain Lake/Closing Deed.pdf
	Little Rain Lake - Milam/Little Rain Lake/NFLTForestStewardshipPlan_signed.pdf
	Little Rain Lake - Milam/Milam/29413-A_29413-A Deed_DEED_20191206.pdf
	Little Rain Lake - Milam/Milam/29413-B Executed Docs 329 acres.pdf
	Little Rain Lake - Milam/Milam/Parcel 1 TC from AGS.pdf
	Little Rain Lake - Milam/Milam/Parcel 2 TC from AGS.pdf
	NFLTPropertyProjectDetermination.docx
	Ortega/MasterCommitment.pdf
	Ortega/Ortega80_deed.pdf
	Putnam Lakes/8493 Title Commitment.pdf
	Putnam Lakes/deed.pdf
	Sixmile Creek/Copies of all Title Policies_Jackets_Endorsements.pdf
	Sixmile Creek/Executed Package.pdf

	Sixmile Creek/Six Mile Creek Deed_closingpacket.pdf
	Sixmile Creek/Sixmile Title Commitment.pdf
	Trail Ridge/301 Land Investments Title Insurance.pdf
	Trail Ridge/Carter Recorded Deed.pdf
	Trail Ridge/Carter Title Policy.pdf
	Trail Ridge/Clay County 301 Land Deed.pdf
	Triangle/Triangle_MoDOT Title Commitment.pdf
	Triangle/Triangle_SpecialWarrantyDeed.pdf
Conservation Easement	Rideout Point Recorded Conservation Easement.pdf
Forest Management Plan/Certification	2018-02-13 NFLT Stewardship Plan, FINAL 2.28.18mpg.pdf
	Black Creek Preserve_Management Plan_final.pdf
	FL-10098_NORTH FLORIDA LAND TRUST_Little Rain Lake Preserve.pdf
	FL-10127_ATFS application_NORTH FLORIDA LAND TRUST_Trail Ridge Preserve.pdf
	FL-10128_ATFS application_NORTH FLORIDA LAND TRUST_Trail Ridge Preserve-Compartment 3.pdf
	LittleRainLake_Management Plan_2019.pdf
	MilamSmithLake_ManagementPlan2020.pdf
	MilamSmithLake_ManagementPlan2020_compressed.pdf
	NFLT FSP 2-10.pdf (Trail Ridge)
	NFLT Putnam Lake Preserve Forest Stewardship Management Plan 02242020.pdf
	NFLT Smith Lake FMP 07-21.pdf
	NFLT_10094.pdf
	NFLT_10098.pdf
	Ortega River Preserve Management Plan.pdf
	RideoutPointPreserve_ManagementPlan_FINALsigned.pdf
	SixmileCreek_ManagementPlan_2019final.pdf
	Triangle_Management Plan_2017.pdf
GIS Files – Spatial Data	All_Fee_Lands.shp
	NFLT_BaselineRx_20240425.shp
	NFLT_CarbonProject_Properties.shp
	NFLT_Ownership20230727.zip
	NFLT_Plot_Grid_BaselineRx_20240425.shp
	NFLT_Plots_FieldVisit_NewV1.gpx
	NFLT_ProjectArea_ContiguousParcelGroups_20240425.shp
	NFLT_ProjectArea_Parcels_20240425.shp
	NFLT_SMZ_20240307.lpkx
	NFLT_stratum_20230727.shp
	NFLT_Stratum_FieldVisit_NewV1.gpx

	NFLT_VariableSMZ_20240425.shp
	NFLTRelocatedPlot.shp
Inventory	Calculator_ACR Inventory_Project.accdb
	DataInputQAQC_20210205.xlsx
	AGCO19007.01_NFLT_Inventory_Methodology_20240416.docx
	NFLT Witness Tree List-2022-10-26.xlsx
	NFLT_Inventory_Stats_202400315_V4.xlsx
	NFLT_RawInventoryData_20240315_V1.4.xlsx
	NFLT_Start_Date_Dead_Removed.accdb
	Plot Data Version 2.1_NFLT_20YrProjectExAnte_20240315.xlsx
	Plot Data Version 2.1_NFLT_Inventory_20230730_V1.2.xlsx
	PlotDataSheets_Scans (1).zip
Modeling	100_Year_LetGrow_FVS_TreeList_East_CuFt Requirement.xlsx
	19007.01_NFLT_Baseline_QAQC_ShowingNewPlotsInSMZ_20240426.xlsx
	Baseline_Compiled_Data.xlsx
	Baseline_Input_Data
	Calculator_ACR Inventory_Baseline_V3.2.accdb
	Compiled_Data_NFLT_20YrProjectExAnte_20240315.xlsx
	Compiled_Data_v3.2_20240426.xlsx
	Cutlist_Combined_HWP_20240315.xlsx
	DeGrow to Start Date For FVS Input.xlsx
	FVSfiles_NFLT.zip
	Finding_23-20-Additional Modeling Methodology for VVB_20240315
	FVS Runs/NFLT_100year_LetGrow
	ModelingUnits_20240424.xlsx
	NFLT Revenues and Costs.pdf
	NFLT_20YrExAnte_Prep_20230315.xlsx
	NFLT_20YrProjectExAnte_Interpolation_V3_20240416.xlsx
	NFLT_20YrBaseline_Interpolation_20240426.xlsx
	NFLT_20YrBaseline_Prep_20240315.xlsx
	NFLT_20YrHWPv4.1_20240424.xlsx
	NFLT_Baseline_HWP.accdb
	NFLT_Baseline_Live_Tree_v3.2.accdb
	NFLT_Baseline_Regeneration README.txt
	NFLT_Baseline_Regeneration_20240315.xlsx
	NFLT_NPV_Analysis_V3.2_20240426.xlsx
	NFLT_NPV_Preworkup_V2.accdb
	NFLT_Plots_soilmu_a_aoi_Intersect_20240315.zip
	NFLT_Plots_Soilmu_a_aoi_intersect_New.xlsx

	NFLT_SiteIndex_V4_20240416.xlsx
	typical practice - minimum operational harvest levels.pdf
	Quantification Walkthrough Documents/19007.01 - Document Walkthrough List for VVB.xlsx
	Quantification Walkthrough Documents/Finding_23-20-Additional Modeling Methodology for VVB_20240315.docx
	Query1.xlsx (Site Index)
	SI_ProceduresWriteUp_V2_20240315.docx
	Trees_Combined_v3.2_20240426.xlsx
Other Documents	NFLT 2023 CURRENT_Employee_Directory.xlsx
	NFLT Organizational Chart from Board Manual.pdf
	ERT Calculations/NFLT_ERT_Calculations_V3.2_20240507.xlsx
	NFLT_ACR722-SDG-Cont-Report-AFOLU-Project-v1.0_20240727.xlsx
	NFLT_Risk Calculation_V1_20250315.xlsx
Common Practice	NFLT_Common Practice_V2_20240416.xlsx
Data Sources	FLORIDA 1Q2020.pdf
	REF_SPECIES.xlsx
	wss_aoi_2024-03-08_10-56-18.zip (soils)

Verifier Documents

Document Description	Filename
Project Specific COI Form	ACR722_COI Form_v2-20230512.pdf
Validation/Verification Plan	ACR722-RP1_Validation-Verification Plan.docx
Sampling Plan	ACR722-RP1_Sampling Plan.docx
Data Check Log	ACR722_NFLT_DCL_7May2024.xlsx
Issues Log	ACR722_NFLT_IssuesLog_v3.3_Closed_7May2024.docx
Site Visit -Plot Sampling t-Test	ACR722-NFLT_T-Test Worksheet_27Feb2024
Validation/Verification Opinion	ACR722-RP1_Validation-Verification Opinion.docx

Appendix B: Findings List

Verifier Issue	**Issue ID:**	**23-1**	**Status:**	**Closed**	**Checked by:**	**SB**	**Date Identified**	**26-Apr-23**

ACR Standard ref	GHG Plan Section	Significance	Issue Description	Comments
ACR Standard (A.3.2)	GHG Plan	New information request. *May impact materiality or conformance.*	Verifiers request the following documents: 1.) Spatial data for the entire plot grid dused for plot allocation as described in the inventory methodology (pg 4-5). 2.) Per Section A2 Applicability Conditions, verifiers request third party certification(s) by FSC, SFI, or ATFS (Certification #, expiration date, acreages, etc). 3.) Please provide the FVS support files used to generate the combined Baseline HWP cutlist so verifiers can confirm constraints applied. 4.) Please provide spatial data for NFLT's entire ownership area.	*AGCO19007.01_NFLT_Inventory_Methodology_v4.0.docx* *NFLT_Baseline_HWP.accdb* *Cutlist_Combined.xlsx*
			July 6, 2023 Findings 1.) Verifiers acknowledge receipt of the NFLT_Plot_Grid_20230630.shp and were able to confirm the spacing between plots matched those indicated in the inventory method (14 chains/924 feet). This issue item is closed. 2.) Verifiers acknowledge receipt of the ATFS certification for the Putnam Lake strata. We understand no harvesting has occurred during the reporting period nor is any harvesting planned within the project area. As such third party certification is not needed as this applicability condition is not required. This issue item is closed. 3.) Verifiers acknowledge receipt of the FVS_HWP folder with FVS output databases and key files. This issue item is closed. 4.) Verifiers acknowledge receipt of the spatial data for NFLT's entire ownership (NFLT_Ownership_20230630.shp). This issue item is closed.	*NFLT_Plot_Grid_20230630.shp* *Issue_23-1\FVS_HWP.zip\FVS_HWP* *NFLT_Ownership_20230630.shp*

PP Response

Date	*PP Comment*	*Additional evidence submitted for review by PP*
12-May-23	23-1(1): Requested spatial data attached. 23-1(2): We have attached ATFS certification for the Putnam Lake and Little Rain Lake strata certification, encompassing the Putnam stratum. In addition, we have provided the Forest Stewardship Management Plan for both of these strata. Also note there is no harvesting occurring in the strata, nor within NFLT's planning horizon. 23-1(3): Requested data attached. 23-1(4): Requested data attached.	23-1(1): NFLT_Plot_Grid_20230630.shp 23-2(2): 23-1(3): FVS_HWP.zip. 23-1(4): NFLT_Ownership_20230630.zip
28 – June-23	The PP has noted an error in NFLT_Ownership_20230630.zip. Several tracts were omitted. Please see NFLT_Ownership_20230727.zip for a corrected version.	23-1(4): NFLT_Ownership_20230727.zip

Verifier Issue	Issue ID:	23-2	Status: Closed	Checked by: SB	Date Identified 26-Apr-23
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR Standard (A.3.2)	Inventory Carbon Calculations	Possible non conformance. *May impact materiality or conformance.*	Verifiers reviewed the carbon calcs and raw inventory data and found the following discrepancies that need further clarification and/or updating. 1.) In the NFLT_RawInventoryData20210208.xlsx file there are three trees with the same tag number in plot 232 that have a different tree tag in the inventory statistics. Please clarify and/or update as appropriate so the tree information is the same between the two spreadsheets. 2.) Plot counts vary across the noted project workbooks. For example, the NFLT_Inventory_Stats (Plot Stratum tab) lists 201 plots, the UNCP,t_ Stratified tab Plot List and Compiled Data in the Calculator_ACR Inventory Access database lists 199 plots and the pivot table in the NFLT_Inventory_Stats.Plot UNCP,t_Stratified tab sums to 200. There are also 213 distinct plots in the Compiled data tree list which aligns with the Raw inventory. Verifiers realize there are trees attributed to plots in exclusion areas which are not considered within the project area. Please update as appropriate to synchronize the tree and plot lists across documents/calculations so they are reflect the trees and plots that are in the project area and used to estimate the project's carbon stocks. 3.) In the NFLT_Inventory_Stats_20230307.xlsx workbook (Plot-Level Data in the UNCP,t_Stratified tab), the Live AG/BG values do not align with values in the pivot tables in the Compiled Data tab. It appears that Dead is being double counted. Please review and revise the summary Plot-Level statistics so they align with the pivot tables on the Compiled Data sheet. 4.) Verifiers noted that the Calculator_ACR_Inventory Access database contains only grown (live) trees. Please provide a complete tree list of live and dead trees for the end of the reporting period as well as the associated plot-level summaries and strata statistics (similar to what is provided in NFLT_inventory_Stats – UNCP, t_Stratified). This should include sampling error and uncertainty.		*NFLT_RawInventoryData20210208.xlsx* *NFLT_Inventory_Stats_20230307.xlsx* *Calculator_ACR Inventory.accdb*

			<u>July 11, 2023 Findings</u> 1.) Verifiers were unable to find the noted NFLT_RawInventoryData20230613_V1.xlsx in the latest document submittal (7/3/2023) to confirm the tree tags were updated as anticipated. Please provide this spreadsheet. 2.) Verifiers appreciate the distinction that 200 plots represent the final plots included in the project. Verifiers find the revised Inventory Stats workbook now consists of 200 plots. Please confirm the plot counts and revise as appropriate in all tree lists including the raw inventory. 3.) Verifiers reviewed the Inventory_Stats_20230613_V1 workbook and found the Dead and Live carbon values by plot in the UNCP,t_Stratified workbook to be accurately calculated. Verifiers were unable, however, to confirm the "Average of Dead MtCO2e/ac" in the associated pivot table as the plots with zero dead carbon aren't being considered in the calculation. Please update data as appropriate. 4.) Verifiers acknowledge receipt of the EORP folder containing the NFLT_RP1_EORP_LiveTreeCO2_V1_not fully updated workbook ("Compiled_Data" tab), which includes both grown live and dead carbon calculations (dead being held constant with inventory). Upon review, verifiers noted the following issues related to that spreadsheet: a. The "Live Tree EORP" tab includes both live and dead trees in TOTAL_CO2E_TONNES_ACRE. As such the tab name and associated averages are misnamed for what they represent and should be updated. b. The data range in the same spreadsheet named "Compiled Data" does not accurately reflect the correct number of trees in Plots 248 and 250. The data range and associated pivot tables should be updated and refreshed as appropriate. c. The description in the Inventory Methodology for the 1/100th nested plot indicates trees ≥ 1.0" and ≤ 4.99" DBH were recorded, which are provided in the revised Inventory Stats workbook. Within this NFLT_RP1_EORP_LiveTreeCO2_V1_not fully updated.xlsx– Compiled Data sheet, verifiers found when trees grown forward reached the 5" threshold for the end of the reporting period their TPA was changed to 20 (to the larger plot). This update appears to be occurring within an Access function and is inappropriate use of	*AGCO19007.01_NFLT_Inventory_Methodology_v4.0_20230630.docx* *NFLT_Inventory_Stats_20230613_V1.xlsx* *NFLT_RP1_EORP_LiveTreeCO2_V1_not fully updated.xlsx.*

			TPA for beginning and ending RP stock calculations. As with FVS modeling, inventory expansion factors should remain unchanged. (e.g., Tree_No 1 in Plot 184). Please review and update EORP project stocks so that TPA values remain constant over the reporting period. 5.) In the process of reconciling inventory and end of reporting period stocks, verifiers realized that the PP re-assigned the dead inventory tree tags to live trees during growth and modelling and renumbered all the live trees. Please introduce a key to the tree list that does not rely on a dynamic field (DBH / HT) so the Raw Inventory can be easily cross referenced to FVS files, BORP, and EORP compiled data and statistics. For example, Tree 4 in Plot 78 is a 12.1" dead tree in Raw Inventory, a 14.5" live tree in Inventory Statistics, and an 8.1" live tree in Compiled Data at the EORP. This is not conducive to easily verifying the inventoried TPA, isolating original Tree Notes on grown trees and confirming the growth increments. Please review and update so that tree numbering reflects the associated tree data accurately and consistently across the project documents.	
			<u>January 18, 2024 Findings</u> 1.) The PP has provided the requested updated *RawInventoryData* workbook (20230727). Verifiers were able to confirm the tree tag discrepancies have been resolved (e.g., 232). Tree_No and associated tree measurements now align with the revised inventory data (*RawInventoryData _20230727)* and inventory statistics (*Inventory_Stats_20230727)* workbooks. The PP has also provided additional clarity with these workbooks regarding the null plot (plot 177) and associated carbon calculations. Verifiers are satisfied with the revisions and clarifications. This issue item is closed. 2.) Verifiers were able to confirm the same number of plots were represented in the revised inventory data and inventory statistics workbooks (200 including the no tally plot 177). This issue item is closed. 3.) Verifiers were able to confirm the revised inventory statistics workbook accurately calculates the live/dead means by plot/strata for the tree list. This issue item is closed. 4.) a.) Verifiers confirmed that the Live Tree EORP tab only includes live trees as evident in the Standing Dead Ind filter for the pivot table. This issue item is closed. b.) Verifiers find the data referenced in the first pivot table in the revised workbook accurately expresses the Live plot carbon *(NFLT_RP1_*	*NFLT_RawInventoryData_20230727_V1.1.xlsx* *NFLT_Inventory_Stats_20230727_V2.xlsx* *NFLT_RP1_EORP_LiveTreeCO2_20230730_v1.2.xlsx* *Calculator_ACR_EORP.accdb*

			EORP_LiveTreeCO2_20230730_v1.2-Live Tree EORP Columns A:C). Please update the definition of the pivot table starting in Column F to include all plots and refresh as necessary given the updated calculations in "New Compiled Data". This will ultimately impact EORP total carbon stocks. c.) Verifiers were able to confirm with the updated tree numbering scheme that inventory TPA was held constant as trees grew above 5" dbh. This issue item is closed. 5.) Verifiers were able to easily cross reference the inventory and EORP tree lists given the introduction of a new unique key for each tree within the revised Inventory Data workbook. This issue item is closed. 6.) During the latest review of EORP pivot table stocks verifiers noted that Plot 133 Tree 17 had a *Decay_Class* and no *Standing_Dead_Ind*. The raw inventory data workbooks also shows this tree as being dead (decay class 1). This dead tree also appears to have been grown in FVS as if it were alive when growth should have been held constant. Please review and/or clarify update as appropriate.	
			April 2, 2024 Findings 4.) b.) Verifiers confirmed the Live Tree EORP and Dead Tree EORP pivot tables now include all trees in all plots in the NFLT_RP1_EORP_LiveTreeCO2 _20240315_v1.4.xlsx workbook. This issue item is closed. 6.) Verifiers find that Plot 133 Tree 17 has been corrected in the majority of the project files with two exceptions listed below: Calculator_ACR_EORP.accdb - Standing_Dead_Ind Plot Data Version 2.1_NFLT_EORP_202400315_v1.4.xlsx – Sheet1 As neither of these two documents are not used in BORP or EORP calculated values in the ERT workbook no further document edits are required. This issue item is considered closed. <u>New Finding:</u> 7.) Verifiers reviewed the ExAnte calculations used to derive the Project Level means for each year and request the following clarifications: a.) The Plot_No in NFLT_20YrProjectExAnte_Interpolation_V2_20240315 - Compiled_Data_1inch_plus tab ties clearly back to the Plot and Tree.	*NFLT_20YrProjectExAnte_Interpolation_ V2_20240315.xlsx*

			Please clarify the difference when looking at the Plot and Plot_No in the Compiled_Data tab. b.) Verifiers understand the PP weighted the project level dead mean by strata area but weights each plot equally when determining the live mean and interpolating. Please clarify why two different approaches were used and update the provided workbook and weighted means in relevant documentation to clearly make the distinction.	
			<u>April 18, 2024 Findings</u> 7.) a.) In the previous 20240315 Interpolation workbook (Compiled_Data tab), the *Plot_No* did not align with Plot:Year:Tree configuration (e.g., Plot 184). Verifiers find these attributes now align in the revised workbook, therefore this issue item is closed. b.) Verifiers acknowledge the update to the interpolation calculation which now weights each plot carbon total by the plot's acreage contribution to its associated stratum. The live and dead acreage means are now being consistently calculated. Verifiers were able to verify the plot carbon values from the tree lists provided and derived the same Annual Change for the reporting period. This issue item is closed. All issue items have been resolved this issue is now closed.	*NFLT_20YrProjectExAnte_Interpolation_V3_20240416.xlsx*

PP Response

Date	***PP Comment***	***Additional evidence submitted for review by PP***
12-May-23	23-2(1): This appears to be a typo and has been corrected. New version of the raw inventory has been provided. Additionally, the plot datasheet for 232 has been provided. 23-2(2): The NFLT_Inventory_Stats.xlsx workbook has been updated to consistently, report the correct number of plots which is 200. A new workbook has been provided which is called: NFLT_Inventory_Stats_20230613_V1. The Access Database contains all the plots measured prior to the intersect with final project boundaries and thus contains more plots than what are used for the inventory stats workbook. This will not be updated as it contains all the relevant information. 23-2(3): This error has been corrected in the new version of the NFLT_Inventory_Stats_20230613_V1 workbook. 23-2(4): Standing Dead trees are conservatively assumed to remain in the baseline scenario. Additionally, the project has conservatively elected to hold standing dead stocks constant and only up those at future inventories at the required intervals.	23-2(1): NFLT_RawInventoryData20230613_V1.xlsx; 232.pdf 23-2(2): NFLT_Inventory_Stats_20230613_V1.xlsx. 23-2(3): NFLT_Inventory_Stats_20230613_V1.xlsx.
27-June-23	23-2(1): This file has now been provided and now included 199 plots, noting that plot 177 was a no tally plot and therefore not in the raw inventory file but is included in all downstream quantification. 23-2(2): This has been updated.	*23-2(1): NFLT_RawInventoryData20230613_V1.xlsx* *23-2(3): NFLT_Inventory_Stats_20230727_V2.xlsx* *23-2(4): Calculator_ACR_EORP.accdb* *Compiled_Data_EORP_20230731_V1.2.xlsx*

	23-2(3): The PP has provided an updated workbook to include that shows updated calculations in which the average standing dead values now include the 0 values. Please see the workbook NFLT_Inventory_Stats_20230727_V2.xlsx. 23-2(4)a: This tab has been updated to only include live trees. 23-2(4)b: This error has been fixed. 23-2(4)c/23-2(5): To facilitate the VVB's data checking, we modified the inventory (NFLT_RawInventory) to give the trees a unique key, this ID is the concatenation of the plot and tree order. Using this key, we updated the NFLT_Inventory_Stats workbook was updated as well as the Plot Data Version 2.1_NFLT_Inventory worksheet which feeds the Access Calculator. The Access Calculator was updated in kind to make sure this unique key was both read in and exported (we also modified the calculator to read in a fixed TPA, addressing the issue in 23-2(4)c. Therefore the Compile_Data xlsx was also updated. Similarly, the associated files with EORP were updated so that a common key could be used to check trees across workbooks.	*NFLT_RP1_EORP_LiveTreeCO2_20230730_v1.2.xlsx* *Plot Data Version 2.1_NFLT_EORP_20230730_v1.2.xlsx* *Calculator_ACR Inventory_NFLT_20230730_V1.2.accdb* *Compiled_Data_20230730_V1.2.xlsx* *NFLT_Inventory_Stats_20230727_V2.xlsx* *NFLT_RawInventoryData_20230727_V1.1.xlsx* *Plot Data Version 2.1_NFLT_Inventory_20230730_V1.2.xlsx*
15-Mar-2024	23-2(4)b: All pivot tables in the updated workbook have been refreshed, all plots (based on other findings that fell outside the project area have been removed and this workbook has been updated. However, it is important to note that EORP live and dead stock values that are reported in the MR are now calculated directly within the ERT workbook. At this point, the EORP workbooks can be ignored as we understand this was used to run the t-test for the site visit. For additional clarity, the Project does not implicitly use any of the files found in the EORP workbook for any downstream quantification. 23-2(6): The project reviewed the plot card for plot 133 and confirmed tree 17 is a dead tree. The project has provided an updated EORP workbook. Additionally, the project confirmed that the standing dead totals for each plot match the updated inventory workbooks. The inventory workbooks needed to be updated because tree 17 on plot 133 was not indicated as dead and therefore the values were not calculating appropriately. We have provided the following updated workbooks: NFLT_RawInventoryData_20240315_V1.3.xlsx and NFLT_Inventory_Stats_20240315_V3.xlsx. The only change to these workbooks were to indicate that tree 17 on plot 133 was dead (e.g. "Y"). This live tree has been removed from all FVS files. It is of course not appropriate to grow forward a dead tree (e.g. tree 133-17) therefore this tree has been removed from the necessary Baseline Files, NPV analysis, HWP calcs, ExAnte Project scenario files, etc. Additionally as the result of another finding, the Project has removed plots that now fall outside the project area boundary and this change (dropping of these plots) has been iterated through all necessary workbooks. The Project has provided updated files to reflect this change.	*NFLT_RP1_EORP_LiveTreeCO2_20240315_v1.4.xlsx* *NFLT_Inventory_Stats_202400315_V4.xlsx* *NFLT_RawInventoryData_20240315_V1.4.xlsx*
16-April-2024	7a) Plot_no (column D in the Compiled_Data tab of NFLT_20YrProjectExAnte_Interpolation_V2_20240315.xlsx is a concatenation of columns A (Plot), B (Year), and C (Tree). Each value of Plot_no is a unique ID for each tree in each year within each plot. The Project has updated the "Plot_no" column to now read "Tree_Unique", as this is a more accurate representation of what is displayed in this column. One of the VVB's original findings was that they were not able to trace individual trees through the various workbooks and as result the Project included this "Tree_Unique" value to make it easier for the VVB to trace these values through the various quantification flows.	*NFLT_20YrProjectExAnte_Interpolation_V3_20240416.xlsx* *NFLT_20YrBaseline_Interpolation_20240416.xlsx* *NFLT_ERT_Calculations_V3.0_20240416.xlsx* *ACR722_NFLT-monitoring-report-template_20240416.docx* *North Florida Land Trust IFM GHG PLAN_20240416.docx*

	7b) The Proponent acknowledges that the Interpolation_Rate tab should weight each plot relative to strata area and strata sampling intensity in order to calculate an unbiased estimate of the annual change in live stocks. NFLT_20YrProjectExAnte_Interpolation_V2_20240416.xlsx and NFLT_20YrBaseline_Interpolation_20240416.xlsx have been updated accordingly. Now both the Project, Baseline, and Standing Dead stocks are calculated using a strata weight.	

Verifier Issue	**Issue ID:**	**23-3**	**Status:**	**Closed**	**Checked by:**	**SB**	**Date Identified**	**26-Apr-23**

ACR Standard ref	GHG Plan Section	Significance	Issue Description	Comments
ACR Standard (A.3.2)	GHG Plan,	Possible non conformance. *May impact materiality or conformance.*	The following typos and points of clarification were identified in the project documents: 1.) GHG Plan: a.) Section A3 Proof of Eligibility lists the project start date as 1/30/2020 while supporting documents list 1/27/2020. b.) Section A4 Location: Please confirm the counties listed are correct given the project areas included (i.e., Baker, Flagler, Nassau counties are listed but project parcels do not appear to be in these counties). c.) The first bullet point in Section A5 appears to be missing a word or two, please make corrections so it reads clearly. d.) Section B5 Harvested Wood Products Step 3 & 4 – weighted average typo e.) Section C1. Regulatory Surplus Test header misspelling in GHG Plan template. f.) Section D1. Verifiers believe the description for Forest Carbon should include dead trees as well. Please review and update as needed and appropriate. g.) Please add page numbers for ease of referencing. h.) Review units and labels for mtCO2e throughout this document (and the modelling methods) to confirm that any labeling of metric tons (mT) as in mTCO2e is consistent. 2.) Inventory Methodology: a.) Section 2 indicates that there are eight strata in the project area. Table 1 and other summary statistics show only seven. b.) Within the Inventory Methodology document (pg 7), the PP provides schematics on the walk-through methodology for Straight Line	*North Florida Land Trust IFM GHG PLAN-v1- 2022-07-07.pdf* *AGCO19007.01_NFLT_Inventory_Methodology_v4.0.docx* *19007.01_NFLT_Modeling_Methodology_v2.0_20220711.docx*

			Boundary and Complicated Boundary (Examples 2-3). If these are figures that were developed from sources other than the PP, please include the associated document references if applicable. 3.) Modeling Methodology: a.) Verifiers were unable to confirm that NHD data was used in the delineation of the wetland modelling strata. Please provide the hydrology spatial dataset used and confirm the source is as indicated in the modelling methodology and GHG Plan. If the spatial dataset was not from a public source, please provide the spatial data files.	
			July 6, 2023 Findings 1.) GHG Plan a.) Verifiers confirmed the project start date was updated to 27th of January 2020 in the GHG Plan. This issue item is closed. b.) Verifiers confirmed the listed counties in Section A4 of the GHG Plan contain project acreage. This issue item is closed. c.) The first bullet point in Section A5 was confirmed to be updated and read without issue. This issue item is closed. d.) The original GHG Plan (North Florida Land Trust IFM GHG PLAN-v1-2022-07-07.pdf) included the spelling of "Weigted Average" instead of "Weighted Average". This was found to be updated in the latest GHG Plan when spell check was run. This issue item is closed. e.) Verifiers confirmed the spelling of Regulatory was updated. This issue item is closed. f.) The Forest Carbon parameter still indicates that only above ground and below ground live trees will be considered. Given the PP's inclusion of aboveground dead trees, verifiers maintain that the definition of Forest Carbon should be expanded to include dead trees. This issue item will remain open pending an update. g.) Verifiers confirmed the addition of page numbers to the GHG Plan. This issue item is closed. h.) Verifiers confirmed the update for instances referencing metric tons of CO2e were consistently used in the GHG Plan. This issue item is closed. 2.) Inventory Methodology a.) Verifiers confirmed the project area strata description now consistently indicates seven strata. This issue item is closed. b.) The Table 3. Caption has been duplicated for both the decision key and the figure. There may also be a typo in the section heading for the Walk-through Method ("Table 3,:")? Please review and/or update as appropriate.	*North Florida Land Trust IFM GHG PLAN-v1- 2022-07-07.pdf* *North Florida Land Trust IFM GHG PLAN_20230630.docx* *AGCO19007.01_NFLT_Inventory_Methodology_v4.0_20230630.docx* *19007.01_NFLT_Modeling_Methodology_v2.0_20220711.docx.*

			c.) Verifiers understand the tree sizes measured in each of the two nested plots given the summary provided in the Inventory Methodology. However, Table 2 of the Inventory Methodology states "indicates which tree sizes are included in each nest" yet the table itself doesn't include the tree sizes. Please update as appropriate. d.) Please add page numbers to this document so we (and other reviewers) can reference sections if there are questions. 3.) Modeling Methodology a.) Verifiers acknowledge that the source of the wetland modelling strata delineation was updated in the GHG Plan from NHD to the National Wetlands Inventory. Please update the Modelling Methodology document to remain consistent with the GHG Plan.	
			January 18, 2024 Findings 1.) GHG Plan f.) Verifiers acknowledge the Forest Carbon parameter in Section D1 has been updated in the revised GHG Plan: Monitored Data and Parameters now includes above ground standing dead carbon in addition to above and below ground live trees. This issue item is closed. 2.) Inventory Methodology b.) Verifiers confirmed that the extraneous reference to Table 3 after the Walk-Through Method header was removed and the decision key was updated to Figure 1 in the revised Inventory Methodology document. This issue item is closed. c.) Verifiers confirmed Table 2 (Nest Plot Specification) was updated with the information regarding tree sizes for each plot size in the revised Inventory Methodology. This issue item is closed. d.) The latest inventory specification now includes page numbers. This issue item is closed. 3.) Modeling Methodology a.) Verifiers noted that section 4.4.1 Conservation Easement and FL BMPs was updated to reference the National Wetlands Inventory in both the revised Modeling Methodology and Inventory Methodology. This issue item is closed. All typos have been addressed, this issue is closed.	*North Florida Land Trust IFM GHG PLAN_20230727.docx.* *AGCO19007.01_NFLT_Inventory_Methodology_20230727.docx.*
PP Response				
Date	***PP Comment***			***Additional evidence submitted for review by PP***

12-May-23	23-3(1)(a): The Start Date has been corrected. 23-3(1)(b): The GHG plan was updated such that the counties referenced were only those contain project area lands. 23-3(1)(c): We made revisions to the referenced passage to improve readability. 23-3(1)(d): No changes made; We request additional clarification on the referenced typo. 23-3(1)(e): Typo fixed. We made a spelling and grammar check to catch other similar issues. 23-3(1)(f): Please see related findings 23-3(1)(g): Page numbers added to GHG plan, in line with ACR GHG plan template. 23-3(1)(h): All references to mass of CO2e in the GHG plan now consistently state "metric tons of CO_2e". 23-3(2)(a):This error, a reference to 8 strata, has been corrected. Section 2 now refers to seven strata in text and in the table. 23-3(2)(b):The figure illustrating the walkthrough method has been replaced by a similar figure; this figure has an attributed reference. 23-3(3)(a): The wetland delineation was sourced from the National Wetlands Inventory. Because of the size of the file, the VVB is advised to download this direct from https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/ in order to confirm. We have corrected the source of wetland geospatial data in the GHG plan.	23-3: North Florida Land Trust IFM GHG PLAN_20230630.doc; AGCO19007.01_NFLT_Inventory_Methodology_20230630.docx
27-June-23	23-3(1)(f): This has been corrected in the Parameters section of the GHG Plan. 23-3(2)(b): This has been corrected, thank you. 23-3(2)(c): This has been corrected by adding detail in the referenced table, thank you. 23-3(2)(d): Page numbers have been added. 23-3(3)(a): This reference has been added to the Inventory Plan and the Modeling Methodology.	North Florida Land Trust IFM GHG PLAN_20240315.docx AGCO19007.01_NFLT_Inventory_Methodology_20230727.docx 19007.01_NFLT_Modeling_Methodology_20230727.docx

Verifier Issue	**Issue ID:**	**23-4**	**Status:**	**Closed**	**Checked by:**	**SB/BS**	**Date Identified**	**27-Apr-23**

ACR Standard ref	GHG Plan Section	Significance	Issue Description	Comments
	MR, Section IV (4)	Non conformance. *May impact conformance; no materiality*	1.) Section IV (2) of the Monitoring Report indicates that the section should include the acreage by strata. Verifiers understand that wetland and upland are modelling units which include multiple strata in each. Please update this section as appropriate. 2.) Section IV (4) of the Monitoring Report includes template instructions for guidance regarding information to include in this section. The Inventory summary should include additional details (e.g., the number of plots measured, the dates measured, and cruisers responsible). Project on-site	*acr-monitoring-report-template_version-4-NFLT_V1*

			stocks at the end of the reporting period should also be estimated and shown here. Please update as appropriate.	
			July 7, 2023 Findings 1.) Verifiers confirmed Section IV(2) in the revised Monitoring Report now includes the acreages for each stratum. This issue item is closed. 2.) Verifiers understand the PP will respond to this issue item when the verifiers have submitted Round 1 Issues Log (after the site visit IL items have been resolved). Thus, this issue item will remain open pending a future PP response.	*acr-monitoring-report-template_version-4-NFLT_20230630.docx*
			January 18, 2024 Findings 2.) ACR did update the Monitoring Report Template (v5.0), additional details of the Inventory description are no longer required in the MR if referenced to inventory methodology in GHG Plan (See Section IV, item 3 of the reporting template). This issue item is now closed. New findings: 3.) As mentioned above there is a new ACR MR template, please update the MR to this most recent version (v5.0). Please also include the request reporting information, which was lacking in the PP's MR provided on 7/27/23, for: (a) Section V (record keeping, internal audit, QA/QC process, etc.) and (b) Section VIII (clarity on VVB – S&A Carbon, full verification w/site visit, etc.).	*ACR-Monitoring-Report-v5.0_ July 2023* *acr-monitoring-report-template_version-4-NFLT_20230727.docx*
			April 8, 2024 Findings The PP has provided ACR Guidance that clarifies the ACR Monitoring Report and GHG plan templates that are required for various project listing and reporting period dates. 2.) This issue item has been re-opened as a result of the provided ACR guidance. This guidance differs than what verifiers previously understood based on ACR discussions on other past verifications. Nonetheless, based on the more recent provided ACR guidance, verifiers agree with the PP that using the older version of the MR (v4.0) is acceptable as the Reporting Period for this project is before 7/1/2023. The PP has revised Section IV (4) of the NFLT MR to include the required information for this ACR template regarding the inventory details (e.g., the number of plots measured and the dates measured) and a summary of the project's estimated on-site stocks at the end of the reporting period. This issue item is now closed. 3.) The revised MR now includes the required information for: (a) Section V (record keeping, internal audit, QA/QC process, etc.) and (b) Section VIII (clarity on VVB – S&A Carbon, full verification w/site visit, etc.). This issue item is closed.	*ACR722_NFLT-monitoring-report-template_20240315.docx* *ACR Guidance_ Templates, Reporting Periods, and Terminology for Emission Reductions and Removal.eml*

			Verifiers acknowledge and agree with the PP that the older GHG Plan template is also acceptable in being used for this project as the validation process started before 7/1/2023. All issue items have been resolved and as a result this issue can now be closed.	

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
12-May-23	23-4(1): We have modified Section IV (2) to display acreage by strata instead of by wetland/upland. 23-4(2): No change, please allow us until Round 1 response to address.	*23-4: acr-monitoring-report-template_version-4-NFLT_20230622.docx*
27-July-23	23-4(2): The PP has updated the Inventory description of the Monitoring Report. The PP acknowledges this is not as detailed as the Inventory Methodology document, but only a high level description of the inventory is described in the Monitoring Report. If this is insufficient or lacks sufficient detail, the PP requests the VVB highlight specific requirements from ACR beyond our interpretation of what is required in the MR template; the PP would not hesitate to add additional information to meet such requirements.	*acr-monitoring-report-template_version-4-NFLT_20230727.docx*
27-Feb-24	23-4(2): The Project has updated the MR to include the total number of plots, inventory dates, states that the forest inventory was led by registered Certified Foresters, and the EORP carbons stocks have been added (calculation now found within the NFLT_ERT_Calculations_V3.0_20240315.xlsx). The Project will not include specific foresters names as this is proprietary information; however, the Project is happy to provide this information to the VVB as the VVB sees fit. 23-4(3): Please see the guidance provided by ACR which shows that the Project is not required to update to the latest version of the MR template nor GHG Plan Template. The provided ACR guidance document states "**Reporting Period ended after 7/1/23:** Project Proponent must use Monitoring Report template v5 (July 2023)" since the reporting period under current verification ends 12/31/2021, the project is allowed to continue to use the monitoring report version 4. Additionally, the guidance states "**Validation activities commenced prior to 7/1/23:** Project Proponent is encouraged to use GHG Project Plan template Version 3 (July 2023) but may use the previously available version" and therefore the project is allowed to the use the previous version of the GHG Plan template. The additional elements required in the MR have been provided.	*ACR722_NFLT-monitoring-report-template_20240315.docx* *ACR Guidance_ Templates, Reporting Periods, and Terminology for Emission Reductions and Removal.eml*

Verifier Issue	**Issue ID:**	**23-5**	**Status:**	**Closed**	**Checked by:**	**SB/BS**	**Date Identified**	**27-Apr-23**

ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**	**Comments**
ACR Standard, Chap 3	MR, Section IV (4)	Possible non conformance. *May impact conformance; no materiality*	Section C1 of the GHG Plan indicates no conservation easements will impact the development of the baseline. The Rideout Point Recorded Conservation Easement specifies "*clear cutting of any kind is strictly prohibited*" and "*there shall be no harvesting in the Wetlands*". The Modelling Methodology highlights two model units but does not distinguish how Wetlands and Uplands within this conservation	*NFLT_Risk Calculation.xlsx* *Rideout Point Recorded Conservation Easement.pdf*

			easement will be modelled. Please clarify how the baseline model accounts for these acres and update the modeling methodology and GHG Plan if appropriate.	*19007.01_NFLT_Modeling_Methodology_v2.0_20220711.docx* *North Florida Land Trust IFM GHG PLAN-v1- 2022-07-07.pdf*
			<u>July 10, 2023 Findings</u> Verifiers acknowledge the PP's intention to modify the modelling plan to accommodate for the Rideout Point Conservation Easement. Verifiers also note the GHG Plan should be amended to include references to this conservation easement (Section B5 Conservation Easement and FL BMPs and Section C1 Regulatory Surplus Test and Table 7 in the same section). This issue remains open pending receipt of the noted updated documents, which the PP plans to respond to during submittal of Issues Log v1 (Round 1).	*North Florida Land Trust IFM GHG PLAN_20230630.docx* *19007.01_NFLT_Modeling_Methodology_v2.0_20220711.docx*
			<u>January 27, 2024 Findings</u> Verifiers reviewed the Conservation Easement for Black Creek Preserve 2 (Rideout Point Recorded CE) and agree with the PP: the CE recording date (1/30/2020) is after the start date. We believe the PP is correct; the CE was recorded after the start date so the associated CE harvesting restrictions do not need to be included as a baseline model constraint. However, as verifiers have not had a situation like this before we are double checking with ACR as the Regulatory Compliance portion of the Project Eligibility section of the ACR Standard seems to indicate legally binding documents, such as the CE, need to be in compliance during the Reporting Period (see v8.0, Chap 3, pg 20). A request for clarification was sent to ACR on 1/27/2024. This issue remains open until guidance has been provided. Once ACR responses, verifiers will provide to the PP.	*Rideout Point Recorded Conservation Easement.pdf*
			<u>January 30, 2024 Findings</u> ACR has provided clarification on the question about whether the CE constraints need to be included in the baseline model. As noted by ACR, this is specified in Appendix A of the Standard (A.4.2): *"IFM baseline modeling must include all relevant legal constraints, including Safe Harbor Agreements, legally binding or State published Best Management Practices, restrictions related to endangered or threatened species, and any conservation easements (in place more than one (1) year prior to the Start Date)."* As the PP has noted, the recording date is after the start date, and thus the CE's constraints do not need to be included in the baseline model. As a result of this clarification, this issue is now closed.	*<u>e-mail</u>: ACR (G.Burns) on 1/30/2024*
PP Response				
Date	***PP Comment***			***Additional evidence submitted for review by PP***

12-May-23		The PP acknowledges the Modeling Methodology states " The project has no pre-existing conservation easements that impact the development of the baseline." And the VVB has discovered an overlooked CE which presents constraints to baseline modeling; in particular the CE restricts clearcutting on uplands and any harvesting elsewhere. The PP intends to modify the modelling plan to accommodate the impact of a different silvicultural baseline regime for this easement's areal extent.	
27-July-23		The project proponent would like to make a clarification. The conservation easement did not exist prior to the initiation of the carbon project. The North Florida Land Trust signed the conservation easement following the initiation of the carbon project as a management action to enable implementation of the carbon project. Therefore, the conservation easement is additional and not part of the baseline.	

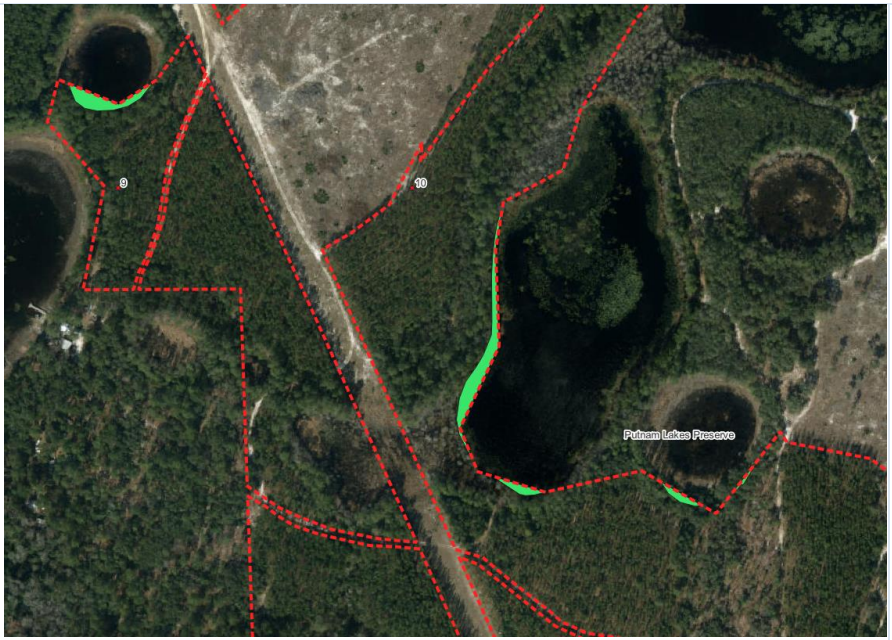
Verifier Issue	**Issue ID:**	**~~23-6~~**	**Status:** **Closed**	**Checked by:** **SB**	**Date Identified** **3-May-23**
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR Standard, v7.0 2.B.3; 4.A.3; IFM Methodology v1.3,B.5	GHG Plan, Section D.1	Clarification. *May impact materiality or conformance.*	Verifiers acknowledge the PPs inclusion in Section D1 of the GHG Plan the PPs monitoring methods "*inventories of select portions of the Project Area will be updated periodically in response to natural disturbance*". The inventory methodology (section 5) indicates that PPs will revisit plots within 6 months of a natural disturbance to account for the disturbance. Please clarify further in the monitoring methods, how the project area will be assessed to determine when a natural disturbance justifies a re-inventory (types of events, threshold acreage, plot allocation, timing, etc.).		*North Florida Land Trust IFM GHG PLAN-v1- 2022-07-07.pdf* *AGCO19007.01_NFLT_Inventory_Methodology_v4.0.docx*
			July 7, 2023 Findings The *Procedures for Early Re-inventory* section of the revised GHG Plan (Section D) now clearly states the type of events, threshold acreage, plot allocation and timing of disturbance that would prompt a re-inventory. The PP defines disturbance agents "*as agents other than intentional mortality of trees planned and caused by the North Florida Land Trust and which result in a loss of canopy cover*." Disturbances are categorized as either soil-related (landslide), biotic (insects/disease), weather related (flooding) or unintended human caused (timber theft, arson). The threshold for acreage is indicated as "*20 contiguous acres affected by a single agent within a given reporting period*." The extent of loss must exceed 5% of trees per acre, 5% of basal area per acre, 5% of canopy cover, or 10% of trees. The PP further outlines methods for monitoring and documenting disturbance to include "*direct field observation, direct comparison of aerial imagery year over year,*		*North Florida Land Trust IFM GHG PLAN_20230630.docx*

			the USFS annual detection surveys and the Florida Fish and Wildlife Conservation Commission's Florida Fire Occurrence Dataset." NFLT will document significant disturbances within 6 months of observation with indicators of agent and severity. A thorough description of plot remeasurement and reallocation in the event of a disturbance has also been added. This issue can now be closed.	

OPO/APD Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
	The GHG plan has been amended to describe clear—and verifiable—protocols to identify and account for disturbances.	North Florida Land Trust IFM GHG PLAN_20230630.doc

Verifier Issue	**Issue ID:**	**23-7**	**Status:** **Closed**	**Checked by:** **SB**	**Date Identified** **3-May-23**
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR Standard, v7.0 2.B.1; IFM Methodology v1.3,B.2; D.2	GHG Plan, Section B.3	Clarification. *May impact materiality or conformance.*	The GHG Plan, Section B3 indicates that the PP determined the project area with geospatial data removing roads, utility right-of-ways, major water bodies and other non-forested areas. The VB notes numerous roads within the project area that have not been removed. As well there are several wetland areas, a power line right of way, and parts of waterbodies included in the project. The verifiers are seeking a more detailed explanation and clarification of how the strata boundaries were determined and detailed specifications of the stratification rules (e.g., minimum mapping unit (if applicable), steps/process used to excluded/included non-forested areas, criteria used to determine which roads to include and exclude from the project. Verifiers have provided spatial data (Check_points) showing the location of examples of the items mentioned above (see points 9, 11, 20, 28 and 30).		*North Florida Land Trust IFM GHG PLAN-v1- 2022-07-07.pdf* *AGCO19007.01_NFLT_Inventory_Methodology_v4.0.docx* *Verifiers submittal: VB_CheckPoints_NFLT_5-12-2023.shp*
			July 10, 2023 Findings Verifiers acknowledge the PP's addition of a project area delineation description in Section A4 Location of the GHG Plan. This description indicates that "*right-of-ways, major water bodies and other non-forested areas not expected to naturally reforest were removed. Right-of-ways and water bodies were determined by aerial photo interpretation. Removed roads included those identified by the World Street Map, available by ESRI*". Given this information verifiers ask the following concerns be reviewed and addressed: 1.) Please submit the shapefiles for the road and utilities layers with associated attributes that the PP used in the designation and removal of roads and utilities right-of-ways within the project area. [Please note, verifiers use QGIS		*AGCO19007.01_NFLT_Inventory_Methodology_v4.0_20230630.docx* *North Florida Land Trust IFM GHG PLAN_20230630.docx* *NFLT_Stratum_20230629.shp* *FL_geodatabase_wetlands.gdb*

			and do not have access to ArcGIS/ESRI specific file types (.shp and .gdb files preferred)]. 2.) Given the removal of water bodies from the project area, verifiers used the USF&W NWI Wetlands spatial data to assist in locating instances where lake/pond delineations may need to be fine-tuned given aerial imagery. Please review and revise the project boundaries and associated acreages as necessary to assure that the areas shown below in pink and green (and other similar water related discrepancies) are removed from the project. Verifiers understand the PP used aerial imagery to assess and delineate non-forested areas. If any publicly available spatial data sets that may have also been used in the project area delineation process please include this information in the appropriate project document. Lastly, was there a minimum area/width or acreage threshold utilized in determining what size class was included/excluded for these water bodies?  Left: Project area in pond south of Plot 47. Right: Pond south of Plots 128 and 129.	



Pond boundary delineations north of Plot 9 and east of Plot 10.

3.) Please add to the project area delineation description any information that was used in assessing emergent type wetlands. Did this type of non-forest area get removed within the project area? One such wetland is shown below west of Plot 48, which is within the project area (source data: USF&W NWI).

4.) Related to the final project area, Acreage by Strata and Project Area Acreage totals should be consistent with GIS acreage across all project documents. An example of this is found in the GHG Plan. Table 1 indicates the total project acres as 3,885.28 while the acres in the by strata table below it sum to 3,910.5. Please update as appropriate in documents submitted.

January 18, 2024 Findings

1.) As noted in the revised GHG Plan (A4), verifiers understand the PP used the OpenStreetMap source data for road assessment and removal within the project area. Please clarify and confirm in the GHG Plan that all public roads (e.g., federal, state and county roads) have been removed from the project area and their associated maintenance right-of-ways.

2.) Verifier appreciate the additional clarity regarding project delineation process in the revised GHG Plan (Section A4) and the Inventory Methodology (Section 2). Verifiers have confirmed the removal of the noted non-forested acreages

NFLT_Stratum_20230727.zip (NFLT_Stratum_20230727 shapefile)

North Florida Land Trust IFM GHG PLAN_20230727.docx

AGCO19007.01_NFLT_Inventory_Methodology_20230727.docx
19007.01_NFLT_Modeling_Methodology_20230727.docx

			associated with open pond/lake/river water that were previously highlighted, specifically portions of Grog Branch in Black Creek Preserve 2 and Smith Lake. Verifiers understand the PP agrees the noted areas are open water and has revised the project area spatial data. Verifiers also understand that no minimum mapping unit was used when assessing open water. This issue item is closed. 3.) Verifiers acknowledge the added description regarding the source data and process in delineating non-forested acres in the project area as stated in the revised GHG Plan: *"Land that is not forested or able to reforest due to inundation was removed by first identifying lands classified as riverine, lake, freshwater pond, or freshwater emergent wetland through the National Wetlands Inventory (source: US Fish & Wildfire Service, Accessed 21 October 2022 from: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/). If interpretation of aerial imagery found no evidence of canopy cover over the last 30 years, these lands were removed from the project area."* Per this additional information, verifiers were able to confirm via aerial imagery assessments and NWI source data that all lands classified as riverine, lake, freshwater pond, and freshwater emergent wetland have been removed from the project area. Regarding the potential wetland near Plot 48, verifiers understand the PP's aerial imagery assessments supersede NWI data during the non-forest delineation process. Verifiers concur with the PP on the assessment of the potential wetland near Plot 48 - this is forest land; based on our aerial imagery assessment of this area, and other potential NWI mapped emergent wetlands, there is the presence of live and dead trees in these areas indicating a forest land classification. This issue item is closed. 4.) Verifiers acknowledge the update of project acres to 3870.9 acres in all project documents except those tables associated with the modelling units (GHG Plan Table 9 and Modelling Methods Table 4). This issue item will remain open pending receipt of final modelling documents after model review.	*acr-monitoring-report-template_version-4-NFLT_20230727.docx* *NFLT_RP1_EORP_LiveTreeCO2_20230730_v1.2.xlsx*
			April 3, 2024 Findings 1.) Section A4 Location and Section B3 Project Boundaries of the revised GHG Plan now include a description regarding the PP' source data used to identify and delineate roads within and near the project (i.e., OpenStreetMap within ESRI ArcGIS Pro' basemaps). Verifiers understand road widths and associated right-	*NFLT_Stratum_20230727.shp* *North Florida Land Trust IFM GHG PLAN_20240315.docx*

			of-ways were removed from the project area based on aerial photo interpretation. Upon review of the most recent aerial imagery (NAIP 2021 FL) and the project's revised spatial data, verifiers are reasonably assured the project boundaries have been conservatively and accurately delineated and that non-forested roads and their associated rights-of-ways have been removed from the project area. This issue item is closed. 4.) Verifiers understand the PP has combined the Modelling Methodology in with the revised GHG Plan. As such the disconnect outlined previously for this issue item has been resolved. This issue item is closed. All issue items have been adequately addressed, thus this issue is closed.	

PP Response

Date	***PP Comment***	***Additional evidence submitted for review by PP***
12-May-23	We have significantly revised the delineation of the project area. - Areas within identified roads were excluded using the ESRI World Street Map basemap. The powerline ROW was cut out. Waterbodies (identified visually using the ESRI Imagery basemap) were cut out. - Additional information in A4 of the GHG plan was provided to describe the process of delineating the project area.	North Florida Land Trust IFM GHG PLAN_20230630.doc
28-July-23	23-7(1): No shapefiles of roads or utilities were used to remove lands within the project area. We did provide greater clarity in the GHG Plan (Section A4) and the Inventory Methodology (Section 2) on how roads and utilities were identified. 23-7(2): The PP provided further clarity to the delineation of project lands in the GHG Plan (Section A4) and the Inventory Methodology (Section 2). Please refer to this when considering our response as the narrative now contains greater detail. The PP reviewed every instance of wetlands (according the the USFWS NWI dataset) in the Project Area and made adjustments, taking care to remove areas capable of not supporting forestland. There was no minimum threshold considered other than the minimum mapping unit used by USFWS. With regards to the specific examples highlighted by the VVB. ~3.1 acres of Grog Branch in Black Creek Preserve 2 has been removed from the project area as the PP agrees this is open water. ~0.4 acres of Smith Lake removed from the project are as the PP agrees this is open water. 23-7(3): Manual aerial interpretation supersedes the classification by USFWS (e.g., at 81.9426723°W 29.8082847°N, the USF&W dataset identifies an emergent wetland; however, this area has varying levels of canopy cover over the years, demonstrating this land qualifies as forest, per the IFM Methodology). 23-7(4): In response to these findings, and the resultant revision to the project lands delineation, acreages, as determined at this time, have been updated in the following documents: Table 1 and Table 2	NFLT_Stratum_20230727.zip (NFLT_Stratum_20230727 shapefile) North Florida Land Trust IFM GHG PLAN_20230727.docx AGCO19007.01_NFLT_Inventory_Methodology_20230727.docx 19007.01_NFLT_Modeling_Methodology_20230727.docx acr-monitoring-report-template_version-4-NFLT_20230727.docx NFLT_RP1_EORP_LiveTreeCO2_20230730_v1.2.xlsx

	in the GHG Plan, the "Area" parameter in D1 of the GHG Plan, Table 1 of the Inventory Methodology, Section IV(2) of the Monitoring Report, GIS tab in NFLT_Inventory_States_20230727_V2.xlsx, cell B9 in Uncertainty tab of NFLT_Calculations_#.0, the Live Tree EORP tab of NFLT_RP1_EORP_LiveTree_CO2.xlsx as well as the maps in A4 of the GHG Plan. Please note acres have yet to be updated in Table 4 of the Modeling Methodology and the identical Table 9 in the GHG Plan 4 as the PP plans to update this following any revisions to baseline modeling (i.e., please mark this as pending for post-SV findings)	
15-Mar-24	23-7(1): The sections relevant to this finding (A4 Location and B3 Project Boundaries) have been rewritten to more clearly state which roads were used to remove project area and the procedure involved. OpenStreetMap is a wiki project that sources roads from surveys and personal knowledge, aerial and satellite imagery, street-level imagery and government sources such as TIGER. We believe this is sufficient to reach reasonable assurance that public roads were removed.	North Florida Land Trust IFM GHG PLAN_20240315.docx

Verifier Issue	**Issue ID:**	**23-8**	**Status:** Closed	**Checked by:** MD	**Date Identified** 11-May-23
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR Standard v7.0, 2.B.1; ACR IFM Methodology v1.3, B2		Clarification. *May impact conformance; no materiality*	When reviewing the property deeds, verifiers could not find deeds & parcel descriptions for the following Parcels: (1) The provided deed (Carter Recorded Deed.pdf) (part of the Trail Ridge Preserve) covers the Carter, George et al parcel and not the James Carter parcel. The Carter, George et al. parcel is not included in the project, however, the James Carter parcel is. (2) The deeds provided for the Little Rain Lake Preserve do not cover project lands in T8S, R24E, section 8. Please provide these deeds or if they were provided, please reference where we can locate them. (3) When reviewing the deed description for the Putnam Lake Preserve, in T11S R23E, Sections 13 & 14, the south boundary of the project area is described as Little Orange Creek. The NHD water flowlines do not line up with the PP GIS property boundary on the stream. What is the basis for the PP stream boundary in this location? Is correction warranted?		*NFLT_Stratum_20210203.shp* *Putnam Lake Preserve > Deed.pdf* *NHDPLUS_H_0308_HU4_GDB*
			July 11, 2023 Findings		*NFLT_Stratum_20230630.shp*

			(1) After review of the provided *Carter Recorded Deed* again, the VB sees it is the same as the originally provided deed and it does correctly describe the James Carter parcel. Sorry for the mistake. This issue item is closed. (2) Regarding the Little Rain Lake Preserve project land in T8S, R24E, Section 8. The PP has provided duplicates of deeds of those originally submitted. None of these deeds appear to cover the land in Section 8. Please provide the necessary deed or point out where these lands are described in the provided deeds. This issue item remains open until supporting ownership information has been provided for this area. (3) In T11S R23E, Sections 13 & 14, the south boundary of the project area is described as Little Orange Creek. The NHD water flowlines do not line up with the PP's spatial data project boundaries. However the PP replies that the tax parcel stream line was used as the basis of the stream boundary. Verifiers reviewed the county tax parcel viewer for this area and confirmed the stream line used is the same as the tax parcel boundary. This issue item is now closed.	*29413-A_29413-A Deed_DEED_20191206.pdf* *Clay County 301 Land Deed.pdf* *Closing Deed.pdf* *Deeds.zip*
			January 22, 2024 Findings (2) Verifiers have reviewed the deed referenced by the PP via the provided link to the Country GIS Property portal. The deed reference is Book 4152, Page 2155 in the county registry of deeds and covers the project land in T8S, R24E, Section 8. This closes this issue item and the entire 23-8 issue is now closed.	https://qpublic.schneidercorp.com/Application.aspx?AppID=830&LayerID=15008&PageTypeID=4&PageID=6756&KeyValue=08-08-24-007016-000-00

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
12-May-23	Please see deeds.zip. Also note the Putnam Lake Preserve boundaries have been modified such that the property aligns with county tax appraisal records.	*Deeds.zip* *NFLT_Stratum_20230630.shp*
28-July-23	23-8-2: Please see the link which takes you directly to the online Country GIS Property portal, where all deeds are available for this tract.	https://qpublic.schneidercorp.com/Application.aspx?AppID=830&LayerID=15008&PageTypeID=4&PageID=6756&KeyValue=08-08-24-007016-000-00

Verifier Issue	**Issue ID:**	**23-9**	**Status:** Closed	**Checked by:** MD	**Date Identified** 11-May-23
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR Standard v7.0, 2.B.1;		Clarification.	In reviewing the submitted spatial data, verifiers noticed numerous instances where the project boundaries (provided Stratum shp) do not align with the properties boundaries		*NFLT_Stratum_20210203.shp* *NFLT_CarbonProject_Properties.shp*

ACR IFM Methodology v1.3, B2, D2		*May impact conformance; no materiality*	(CarbonProject_Properties shp). In some cases whole parcels are offset whereas other instances they line up perfectly. Although the differences are not great, they can cause confusion and erroneous verification assessment results (e.g., reviewing plot allocations or assessing walk-thru plots during a site visit). Verifiers have provided spatial data showing points of several examples of these observed discrepancies (Check points.shp - see points 6, 22 and 23). Also, please clarify what aerial imagery was used for project area delineation and projection used in GIS.	*Verifiers submittal: VB_CheckPoints_NFLT_5-12-2023.shp*
			July 12, 2023 Findings Verifiers understand the *NFLT_CarbonProject_Properties.shp* should be disregarded and the revised *NFLT_Stratum* spatial data should be used for the boundaries of the project area. Regarding the check points (6, 22 and 23) the VB agrees with the PP's responses. On check point 6 the PP adjusted the line to match the tax parcel line, a slightly more conservative change. On check point 22, the PP adjusted the boundaries to match the tax parcel lines, this better aligns with aerial imagery features such as vegetation changes as well. On check point 23, the tax parcel line appears to not align accurately with features on the aerial photos and there is no overlap so the PP chose to be conservative and not change the boundary. Verifiers are satisfied with these project boundary spatial data revisions and as such this issue is now closed.	*NFLT_Stratum_20230630.shp; VVB_checkpoints_PPResponse_20230630.shp*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
12-May-23	**23-9:** Please disregard *NFLT_CarbonProject_Properties.shp.* Please use the updated strata shapefile for official project area delineation. Please also see our individual responses added to the attribute table for the VVB check points. The aerial imagery was the Imagery ESRI basemap using on-the-fly projection.	*NFLT_Stratum_20230630.shp; VVB_checkpoints_PPResponse_20230630.shp*

Verifier Issue	**Issue ID:**	**23-10**	**Status:**	**Closed**	**Checked by:**	**MD**	**Date Identified**	**11-May-23**

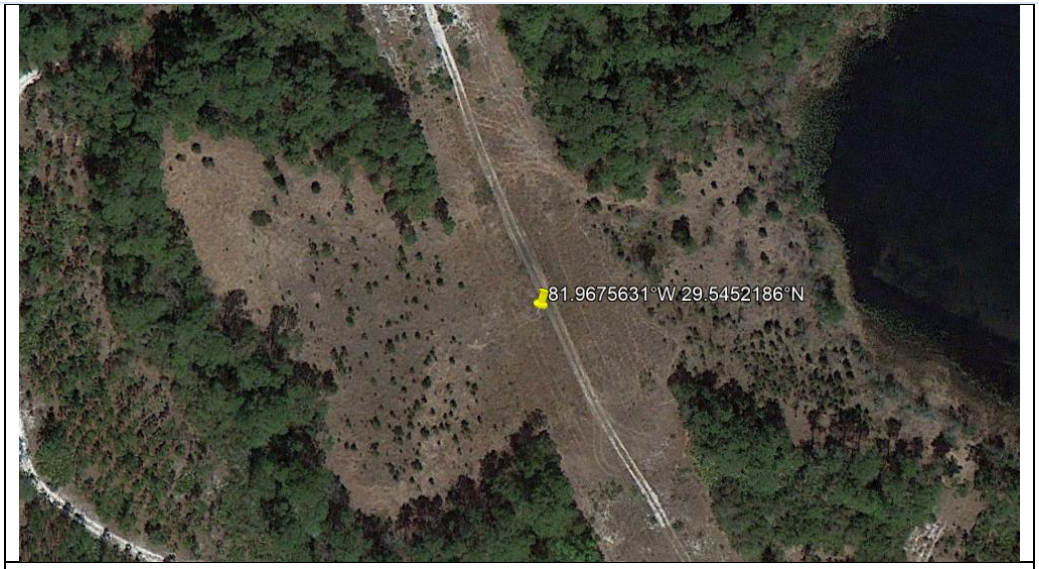
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**	**Comments**
ACR Standard v7.0, 2.B.1; ACR IFM Methodology v1.3, B2, D2		Clarification. *May impact conformance; no materiality*	In reviewing the project boundaries over aerial imagery, verifiers find the following: (1) Verifiers are trying to ascertain how the project area was delineated and the associated spatial data used. In the first sentence of Section B3 Project Boundaries, please explain what is meant by a "geospatial file. Also, there are instances where the project area is wholly within the property boundaries and runs through forested land with no visible indication of what determines the stratum / project boundary. For example, see the attached verifier spatial data points 21 and 16 (check point shp file).	*North Florida Land Trust IFM GHG PLAN-v1- 2022-07-07.pdf* *NFLT_Stratum_20210203.shp* *Verifiers submittal: VB_CheckPoints_NFLT_5-12-2023.shp*

			Please provide a detailed description in the GHG plan of how the project area boundaries were determined and any associated spatial data source references that might have been used. (2) On the O'Conor-Driggars parcel, part of the Little Rain Lake-Milam Preserve, verifiers question the reasoning for including an apparent non-forest use area in the project area. For reference, please see the verifiers spatial data for point 27 (check point file). On this same parcel, a building area has been removed from the project area, yet just east is an apparent mowed area which is included in the project area. This mowed area appears to have a fence around, possibly indicating pasture land or some other agricultural objective. Please explain the reasoning for including this area and/or revise as appropriate. (3) There is an instance where the property boundaries may not be accurate relative to land use. Please see verifiers spatial data check point #19 on the Trail Ridge Preserve. The project boundary extends to the north into the clear cut. Also according to the Clay Co. tax parcels the road is the parcel boundary there, not the straight line in the clear cut. So there is a strip of land in the project area that, according to the tax parcels, is not owned by the PP. Please review and revise as needed and appropriate.	
			<u>July 12, 2023 Findings</u> (1) Verifiers acknowledge the PP added further explanations to the revised GHG plan in Section B3. We understand the property boundaries are determined using the county tax parcel boundaries, however the project area does not include the entire NFLT property ownership. Please explain how project boundaries were determined when they are not coincident with tax parcel boundaries. The PP further explains that non-forest areas have been removed from the project. As mentioned in Issue #23-7, verifiers request the PP add a description within the appropriate project document(s) that includes the spatial data sources and associated criteria used for delineating non-forest areas within the project area. Regarding the PP responses on check points 16 and 21, the PP explains the noted forested area has been conservatively excluded. Based on the NAIP aerial imagery (FL 2021), we are unclear on the delineation method utilized in this area; it appears the boundary delineation is arbitrary? For example, in the proximate area to check points 16 and 21 the project boundary follows obvious tree edges but at points 16 and 21 the project edge passes through forested area and follows no obvious feature. Verifiers request additional clarification; please explain the criteria used for delineating the project boundary thru forest stands such as this. While we understand the project area boundaries are not	*North Florida Land Trust IFM GHG PLAN_20230630.docx* *VVB_checkpoints_PPResponse_20230630.shp*

			required to follow specific land or forest features, we are inquiring to obtain a better sense of how the project area was determined. (2) Verifiers are satisfied with the PP's explanation regarding this apparent non-forest area; the PP adjusted the project area to exclude it, which seems reasonable and conservative. This issue item is now closed. (3) Verifiers concur with the PP's removal of the area north of the road from the project area (near check point #19). The PP adjusted the project area to exclude it, which seems reasonable and conservative. This issue item is now closed. An additional item has been added to this issue based on the PP's review of the verifiers' checkpoint spatial data: (4) In the attribute table of the PP's spatial data response to the verifiers' checkpoint spatial data (*VVB_checkpoints_PPResponse_20230630),* the PP requests further clarification as what check point 28 is referring to. Verifiers are questioning whether the lands east and west of this check point 28 qualify as forested land – it is currently mapped as an emergent wetland (source: USF&W NWI). Please explain and make adjustments if needed.	
			<u>January 22, 2024 Findings</u> (1) Verifiers have reviewed the clarifications and added details in the revised Inventory Methodology and GHG documents for how project boundaries are determined and delineated. Specifically from the GHG plan Section A4, "*…areas not designated for the IFM project; these lands are generally managed for objectives other than carbon, such as firebreaks and timber management, or have a planned or implemented land use other than forest.*"; and "*Designated through review of aerial imagery, on-the-ground assessments, and management records...*" This issue item is now closed. (4) Verifiers completed additional review of more recent Google Earth imagery (May 2001) and agrees with the PP that some trees are growing on the site although it clearly is a wet and poorly drained site condition. We agree this area qualifies as forest land. This issue item is closed, as is the entire 23-10 issue.	*AGCO19007.01_NFLT_Inventory_Methodology_20230727* *North Florida Land Trust IFM GHG PLAN_20230727* *NFLT_Stratum_20230727.zip (NFLT_Stratum_20230727 shapefile)*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
12-May-23	23-10(1): The GHG Plan has been revised to avoid ambiguity. Please see *VVB_checkpoints_PPResponse_20230630.shp* 23-10(2): Please see *VVB_checkpoints_PPResponse_20230630.shp*. NFLT confirms this area was once pasture but fences have been removed and is allowed to regenerate; however the majority of this pasture was removed from the geographic project boundary for conservativeness. 23-10(3): . Please see *VVB_checkpoints_PPResponse_20230630.shp*	*VVB_checkpoints_PPResponse_20230630.shp*

30-July-23	23-10(1): The PP provided further clarity to the delineation of project lands in the GHG Plan (Section A4) and the Inventory Methodology (Section 2). Please refer to this when considering our response as the narrative now contains greater detail. The PP reviewed the reference ACR Standard and it doesn't appear that there exist requirements within the selected methodology nor ACR Standard v7.0 that would require the PP to explain why certain lands were excluded. 23-10(4): Thank you for the clarification, it was extremely helpful. Both the East and West areas of the of checkpoint 28 are naturally revegetating and are thus eligible. Additionally, these areas fall within the broader landscape which is clearly all forest land. The PP has provided a set of high quality imagery snapshots to demonstrate that these areas are revegetating. 2011  2013	NFLT_Stratum_20230727.zip (NFLT_Stratum_20230727 shapefile) *AGCO19007.01_NFLT_Inventory_Methodology_20230727* *North Florida Land Trust IFM GHG PLAN_20230727*



2016

Verifier Issue	Issue ID:	23-11	Status: Closed	Checked by: SB	Date Identified 7-Jul-23
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR IFM Methodology v1.3; C3 (3.1.1), D2, D3		Clarification. *May impact conformance; no materiality*	Verifiers seek clarification regarding the allocation and subsequent removal of Plot 249 in the Ortega Preserve. Verifiers understand that this plot became a hazard plot due to storm damage and could not be inventoried. Verifiers understanding, based on past projects where hazard plots have been identified and subsequently dropped, is that the area associated with this plot is removed from the project area or, if it is retained, is to assume zero carbon until the plot can be re-measured. Please review and revise project documents as appropriate.		*NFLT_Plots_20210203.shp.*
			January 22, 2024 Findings While verifiers have reviewed the noted publication, the issue is based on what has previously been accepted by the registry, as such, verifiers are unable to close this issue without the approval of ACR. The guidance related to hazard and/or dropped plots has been consistent from the registry. Verifiers request the PP set up a meeting with ACR and S&A to discuss and resolve this issue.		
			April 2, 2024 Findings Verifiers find the ACR description and the PP's interpretation on the treatment of unsampled hazard plots, is consistent with the March 1, 2023 ACR guidance provided by the PP and verifier expectations based on similar situations for previous verifications. Verifiers acknowledge the revised project documents now includes Plot 249 in the inventory plot list with zero carbon which has also been incorporated in the uncertainty calculations. Verifiers also understand and confirmed this plot is assumed to have the same tree list and carbon calculations as Plot 250 in the baseline given the ACR guidance (i.e., highest plot carbon/acre for the stratum that Plot 249 is in). The PP asserted in the model review call on April 3, 2024, that Plot 249 exists on the same soil type and would be given the same site index value as Plot 250 for future projections. Verifiers were able to confirm all plots in the Ortega Preserve have MUKEY: 738852 in the NRCS soils data which is consistent with this assertion. Verifiers agree with the PPs use of Plot 250 information for Plot 249 in the baseline until the plot can be sampled. This issue is closed.		*ACRGuidance_20240301.pdf* *NFLT_Inventory_Stats_202400315_V4.xlsx.* *NFLT_20YrProjectExAnte_Interpolation_V2_20240315.xlsx* *NFLT_20YrBaseline_Interpolation_20240315.xlsx*
PP Response					
Date	***PP Comment***				***Additional evidence submitted for review by PP***

28-July-23	Each observation, x, of tonnes CO2e/acre, in stratum *h*, x_h is an equally weighted attempt at estimating μ_h by means of calculating $\bar{x}_h$ using the sample set $\{x_1, x_2,\ldots,x_n\}$; in other words, it is universally accepted that $E(x_{i,h}) = \mu_h$. Given that we used stratified sampling with a systematic layout, a dropping of a plot simply reduces n_h by 1 (and likewise remove a potential observation). The systematic grid is one simple design to ensure the inventory adheres to qualities of probability-based inventory designs: interspersion, unbiasedness, and independence; systematic layouts are chiefly there to assure interspersion of samples within the sampling frame. Adding a plot with a value of 0 tonnes CO2e/acre would bias the inventory by assuming that $\mu_h < \bar{x}_h$. This is because $E(\bar{x}_h) = \sum x_{i,h} / n_h$, not $E(\bar{x}_h) = \sum x_{i,h} / (n_h+1)$ as implied by this finding. Additionally, removing a sub-stratum within the stratum implies the PP has designed a two-staged stratified inventory, which is not the case. The PP also notes that the Project is taking a penalty due to the dropped plot by means of an increased standard error (and consequently high uncertainty). Lastly, the PP reviewed relevant literature. McRoberts (2002; doi: 10.1139/x03-112) empirically evaluated ignoring plots against several other techniques such as imputation, replacement with a stratum mean, replacement with another previously observed plot, and use of auxiliary data) and found that "For the proportion of missing plots ranging from 1% to 10%, acceptable results were obtained for techniques that both ignored and replaced missing plot observations". In this case only 0.5% of samples are missing. If the VVB is not satisfied, the PP is happy to provide a demonstration of leave-one-out resampling where we can show the distribution of project means and demonstrate that the effect of dropping one plot is statistically insignificant (in other words the variance of samples is larger than the effect size of omitting a plot).	*https://proofwiki.org/wiki/Sample_Mean_is_Unbiased_Estimator_of_Population_Mean* McRoberts, R.E., 2003. Compensating for missing plot observations in forest inventory estimation. *Canadian Journal of Forest Research*, *33*(10), pp.1990-1997.
15-Mar-24	The VVB has requested clarification from ACR, which has been provided to the VVB for review (see: ACRGuidance_20240301). We have updated workbooks appropriately. At the start date, Plot 249 now assumes Plot 250's treelist, biomass and carbon stock as Plot 250 was the plot with the highest carbon stock within the Ortega River Preserve. At any subsequent date in the Project scenario, Plot 249 has been assigned no carbon stocks. Please note that the final number of plots has changed. Whereas the VB was previously under the impression there were 200 plots, the inclusion of plot 249 brings this total to 201 plots. However, we note plots should now be removed following revisions to the project area (addressed in previous findings); the removed plots are plots 112, 203 and 228, resulting in a total of 198 plots. As a result adding plot 249 and dropping plots 112, 203, 228, the NPV Analysis for determining the Baseline scenario was rerun and therefore the baseline was updated, the project scenario has been updated, ERT workbook has been updated, inventory quantification has been updated, site index calculations have been updated, new spatial files have been provided, and all project reporting documentation has been updated. Effectively all project documentation and quantification has been updated.	ACRGuidance_20240301.pdf

Verifier Issue	**Issue ID:**	**23-12**	**Status:**	**Closed**	**Checked by:**	**SB**	**Date Identified**	**11-Jul-23**

ACR Standard ref	GHG Plan Section	Significance	Issue Description	Comments
ACR IFM Methodology v1.3, C3 3.1.1		Clarification. *No impact on materiality or conformance*	Verifiers have reviewed the biomass and carbon calculations and methodology including the application of defect. It is not clear from the description alone how the overall biomass deduction is determined for broken trees. Please clarify in Inventory Methodology how the measurements for Missing/Rotten Biomass and Standing Dead phantom and break height are factored together to generate the overall defect (FINAL_PCT_REMAINING).	*AGCO19007.01_NFLT_Inventory_Methodology_v4.0_20230630.docx* *Calculator_ACR Inventory.accdb*
			January 24, 2024 Findings After further review, verifiers now understand that the FINAL_PCT_REMAINING is calculated by multiplying the Remaining Biomass % by the BREAK_HT_Remaining % which was computed using the break height and the following ratios for biomass distribution: 65% bottom, 25% middle, and 10% top. Verifier also acknowledge that for trees with a broken top the missing biomass is only applied below the point of break which is consistent with the application of Missing/Rotton Biomass across the remaining Standing Dead % of the tree. This issue item is closed.	*Calculator_ACR Inventory.accdb*

PP Response

Date	***PP Comment***	***Additional evidence submitted for review by PP***
28-July-23	The PP has added additional information in the Inventory Methodology to describe calculations pertaining to missing/rotten biomass and standing dead phantom and break height, at a high level. The VVB is advised to refer to 'Do_Stuff' in the Eastern module of *Calculator_ACR Inventory.accdb* to see analytical procedures in practice.	AGCO19007.01_NFLT_Inventory_Methodology_20230727.docx

Verifier Issue	**Issue ID:**	**23-13**	**Status:**	**Closed**	**Checked by:**	**SB/BS**	**Date Identified**	**7-Jul-23**

ACR Standard ref	GHG Plan Section	Significance	Issue Description	Comments
		New information request. *May impact materiality or conformance.*	Following the delivery of the pre-site visit Issues Log v1.0 (6/20/23), verifiers identified two other issue items. On June 22, 2023, verifiers emailed the PP requesting they respond to these when they respond to the pre-site visit Issues Log. These items are listed below: (1) Verifiers found a file reference to a workbook in the *NFLT_ERT_Calculations_V3.0* (EORP tab) called *NFLT_RP1_EORP_LiveTreeCO2.xlsx*. We were unable to find this workbook in the submitted files to date. Please provide this document as it may aid in assessing EORP strata statistics. If you did provide it and we missed it, let us know where it is stashed. (2) Please confirm that the *ACR_Calculator_Inventory.accdb* contains live trees at the End of the Reporting Period (not at Inventory). Regardless, we will need calculations and	*NFLT_ERT_Calculations_V3.0* *ACR_Calculator_Inventory.accdb*

			information to be added to the GHG plan regarding growth adjustment process used to estimate EORP stocks.	
			July 10, 2023 Findings (1) Verifiers acknowledge the requested document has been provided. (2) Verifiers understand the *ACR_Calculator_Inventory* Access database contains the tree list information for the EORP. Thanks for confirming. This issue is now closed.	*NFLT_RP1_EORP_LiveTreeCO2.xlsx* *ACR_Calculator_Inventory.accdb*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
12-May 2023	(1) File attached. (2) Yes this database is EORP.	*NFLT_RP1_EORP_LiveTreeCO2.xlsx* *ACR_Calculator_Inventory.accdb*

Verifier Issue	**Issue ID:**	**23-14**	**Status:** **Closed**	**Checked by: BS/SB/EM**	**Date Identified**	**12-Jul-23**
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**			**Comments**
ACR IFM Methodology v1.3; C3 (3.1.1), D2, D3		New information request. *May impact materiality or conformance.*	In the "Plots Near Boundaries" section of the Inventory Methodology, the PP notes the following: *"If a plot center clearly falls outside the project area boundary, move the plot center perpendicular to the boundary into the project area 1-2 chains. This new plot location is to be taken if the resultant plot is not Walk-Through or outside the project area boundary. If these conditions cannot be met then starting clockwise from North move the plot in a cardinal direction 1-2 chains. In any instance of plot center relocation, move the plot 1 chain and if the above conditions are not met move the plot up to 2 chains. Record the distance and azimuth, including the new GPS coordinates on the plot tally sheet."* Verifiers request if this method was used during the plot allocation and inventory data collection process, please provide the plot numbers that were relocated (if any). If there is GPS spatial data associated with the plot centers of these relocated plots please provide.			*AGCO19007.01_NFLT_Inventory_Methodology_v4.0_20230630.docx*
			January 20, 2024 Findings Verifiers understanding is that plot offsetting introduces potential inventory bias and is not a statistically sound approach for inventories that are used for estimating forest carbon stocks. The PP asserts the process for allocating "Plots Near Boundaries", described above, was not utilized during the inventory. As this process was not utilized, please remove from the Inventory Methodology document.			*AGCO19007.01_NFLT_Inventory_Methodology_20230727*
			April 8, 2024 Findings			

			In the NFLT_SiteIndex_V2_20240315 workbook (SI_OrigPlot vs. RelocatedPlot tab) there are comments in cells A1, F1 and K1 indicating there were 2 or 3 plots that were relocated per the Inventory SOP. Verifiers were unable to determine from this document which plots were relocated as only 1 plot is listed in this workbook (Plot 43). Please clarify. Regarding the plot allocation method for plots near project boundary edges where cruisers find the plot outside the project area, verifiers agree that the use of a standard protocol that includes moving a predetermined distance and direction from the randomly placed plot center is a statistically sound approach to re-locating these plots. The part of the previous protocol that verifiers were concerned with was the condition that the re-located plot not require a walk-through. When plots are purposefully offset to avoid edge correction, edge conditions can be under-sampled in the inventory. The revised version of the inventory methodology has removed the requirement that the re-located plot not require edge correction, so this part of the issue is now closed.	
			<u>April 19, 2024 Findings</u> Verifiers understand there were 3 plots that were initially relocated and two of these plots were recently removed from the project area as they were found to be outside the revised project boundary as noted in Issue item 23-11 (Plots 112 and 203 dropped) and only 1 plot was relocated (Plot 43). The PP has updated the comments in the revised SiteIndex workbook ('SI OrigPlot vs RelocatedPlot' tab) to provide additional clarity on the plots relocated and those that were subsequently dropped. The requested clarification on the site index workbook comments has been provided, as such the issue is now closed.	*NFLT_SiteIndex_V3_20240416.xlsx*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
28-July-23	This method described in the Inventory Methodology was never utilized as 1) the GIS exercise to allocate plots was spatially constrained by the project area delineation, and 2) in the field, no plot centers landed outside of the project area.	
15-Mar-24	Based on the VVB's finding, we reviewed the plot cards and found that 1 one plot was moved. This language in the inventory methodology has been included in two (Otter Creek and Kite Hamock) previous ACR IFM projects which were both validated and verified by S&A and subsequently approved by ACR. However, we note the language in the Inventory Methodology can be made clearer and revised to better reflect the procedure employed. Please see AGCO19007.01_NFLT_Inventory_ Methodology_20240223.docx. The Project asserts that the approach applied in the field and described in the Inventory Methodology is a statistically sound approach. Because cruisers were not able to make decisions in the field regarding the relocation of plots and cannot consider the implications of adjusting plot centers, we note that this method (moving a predetermined distance from a predetermined azimuth from a randomly selected location within the grid of potential plots) prevents statistical bias either intentionally or unintentionally. The effect of this is materially no different than the selection of different randomly selected plots OR than GPS accuracies leading plot centers to be established some distance away from their planned locations, i.e., a different sample could have been measured but wasn't due to chance.	*AGCO19007.01_NFLT_Inventory_Methodology_20240315 .docx* *NFLTRelocatedPlot.shp*

16-April-2024	The Proponent reaffirms that only plot 43 in the final list of included plots was moved. This is the only plot present in the tab ' SI_OrigPlot vs. RelocatedPlot'. The VVB will note that the comment in A1 of this tab referenced plot 112; this and Plot 203 were moved but also subsequently dropped upon refinement of the project area (see Finding 23-11). We have revised the comments within the tab ' SI_OrigPlot vs. RelocatedPlot' to transparently report the three plots that were moved. The Project notes, **that the calculations in the updated NFLT_SiteIndex_V3_20240416.xlsx have not changed from the last submission** and the Project has only updated comments in the workbook to be more explicit and transparent.	*NFLT_SiteIndex_V3_20240416.xlsx*

Verifier Issue	**Issue ID:**	**23-15**	**Status:** **Closed**	**Checked by:** **SB**	**Date Identified** **11-Jan-24**
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR IFM Methodology v1.3; C3 (3.1)	GHG Plan, Section B5	New information request. *May impact materiality or conformance.*	Please provide the step-wise code and/or workbooks used during the derivation of the plot site index values. Verifiers understand the PP used NRCS soils information during this process. We are currently verifying that the steps outlined in the GHG Plan (Section B5, Model Calibration) were implemented as described.		*North Florida Land Trust IFM GHG PLAN_20240315.docx*
			April 3, 2024 Findings Verifiers appreciate the SI_Procedures Write Up and the comments provided throughout the NFLT_SiteIndex workbook. Verifiers were able to verify the plot level site index model calibrations used. Verifiers did note, that while the strata acres were not used they were not updated in the *NFLT_SiteIndex_V2_20240315.xlsx - Plot Stratum* tab of the workbook. Please update as appropriate to remain consistent across project documents.		*NFLT_SiteIndex_V2_20240315.xlsx,* *SI_ProceduresWriteUp20210315.docx*
			April 18, 2024 Findings Verifiers confirmed the project areas in the Plot Stratum tab of the Site Index workbook have been updated to remain consistent with project documents. This issue is closed.		*NFLT_SiteIndex_V4_20240416*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	The Project has provided additional documents for the VVB's review, please see the column to the right.	*NFLT_Plots_soilmu_a_aoi_Intersect_20240315.zip, NFLT_SiteIndex_V2_20240315.xlsx, SI_ProceduresWriteUp20210315.docx, wss_aoi_2024-03-08_10-56-18.zip, NFLT_Plots_Soilmu_a_aoi_intersect_New.xlsx*
16-April-2024	NFLT_SiteIndex_V3_20240416.xlsx now has updated acreages for strata in the Plots tab. As the VVB noted, this has no effect on the downstream calculations.	*NFLT_SiteIndex_V3_20240416.xlsx*

Verifier Issue	**Issue ID:**	**23-16**	**Status:** Closed	**Checked by:** SB	**Date Identified** 11-Jan-24
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR IFM Methodology v1.3; C3, 3.2		Clarification. *May impact materiality or conformance.*	Verifiers are reviewing the initial baseline HWP calculations and have the following clarification requests: 1.) Update *NFLT_20YrHWPv2.xlsx* – "Product Breakdown" tab should be revised with the updated project acres. 2.) Verifiers reviewed the *NFLT_20YrHWPv2.xlsx* – "Species Reference" tab; we are unclear where specific gravities were sourced that are not found in Table 5-3a of the 2010 USFS Wood Handbook (included in this group are pondcypress (222), American hornbeam, musclewood (391), hickory spp.(400), ash spp.(540), sweetbay (653), blackgum (693), redbay (721), and turkey oak(819)). Please clarify the source and provide reference documentation (if appropriate) that was utilized for determining these specific gravities.	*North Florida Land Trust IFM GHG PLAN_20230727.docx* *NFLT_20YrHWPv2.xlsx*
			April 4, 2024 Findings 1.) Verifiers reviewed the "Product Breakdown" tab which now shows the latest overall project acreage attributed to a single supersection which does not align with the revised GHG Plan. Please clarify this disconnect or list the Florida Coastal Plains Central Highlands (Putnam Lakes Preserve) Supersection in the calculation of the weighted average "Wtd Average" and refresh associated worksheets as appropriate. 2.) Verifiers have reviewed the specific gravities used by the PP in the revised harvested wood products calculations. Verifiers understand the PP used the California Air Resources Board's REF_SPECIES.xlsx for specific gravities. Verifiers found species specific gravities present in both the USFS Wood Handbook and the REF_SPECIES.xlsx (WOOD_SPGR_GREENVOL_DRYWT) matched. Verifiers deem the REF_SPECIES.xlsx - WOOD_SPGR_GREENVOL_DRYWT an appropriate source under Section 4.2.4 Step 1 B(II) of the ACR IFM protocol. Verifiers also acknowledge the GHG Plan update to Section B5 Harvested Wood Products that sites this source. This issue item is closed. 3.) Verifiers acknowledge the correct mill efficiencies are located in the Mill Efficiencies tab of the *NFLT_20YrHWPv3_20240315.xlsx* workbook. However, verifiers were unable to trace how the Mill Efficiencies were being applied in the latest Harvested Wood Products calculations. Please clarify and/or update as appropriate.	*NFLT_20YrHWPv3_20240315.xlsx* *North Florida Land Trust IFM GHG PLAN_20240315.docx* *REF_SPECIES.xlsx* *USFS Wood Handbook*

			4.) Verifiers noted the Year is not being pulled in on the *NFLT_20YrHWPv3_20240315.xlsx* - Step3 Step 6.HWP Computations tab as anticipated. Please update as appropriate.	
			April 18, 2024 Findings 1.) Verifiers find the 20YrHWPv4 workbook has been updated to include the project acreage in the Florida Coastal Plains Central Highlands Supersection. The Product Breakdown has been corrected to account for this acreage and the values reported consistently in the GHG Plan. This issue item is closed. 3.) Verifiers were able to confirm the correct mill efficiencies for the state of Florida are being applied correctly in the revised NFLT_20YrHWPv4 workbook. This issue item is closed. **4.)** Verifiers confirmed the year cells in the NFLT_20YrHWPv4- Step3 Step 6.HWP Computations tab are now updated as anticipated. This issue item is closed. All issue items have been resolved, therefore this issue is closed.	*NFLT_20YrHWPv4_20240416.xlsx* *North Florida Land Trust IFM GHG PLAN_20240416.docx*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	23-16 (1): Total project acres have been revised. Additionally, the Project notes that we found an error not identified by the VVB and have subsequently updated the HWP workbook. 23-16 (2): A new workbook has been provided that references the REF_SPECIES tab which is an available resource from CARB and complies with the ACR IFM methodology. Additionally, the Project has updated the relevant reference in the GHG Plan. The VVB has also provided the REF_SPECIES.xlsx, which can also be downloaded at https://ww2.arb.ca.gov/our-work/programs/compliance-offset-program/compliance-offset-protocols/us-forest-projects/2015/instr-45states.	*North Florida Land Trust IFM GHG PLAN_20240315.docx* *NFLT_20YrHWPv3_20240315.xlsx* *REF_SPECIES.xlsx*
16-April-2024	1: NFLT_20YrHWPv3_20240416.xlsx Product Breakdown tab now aligned with GHG Plan and correctly reflect that the Project Area falls into two different supersections. 3: Cell reference to mill efficiencies added to cells B7 through E10 in the HWP Computations tab. Carbon harvested for HWP now deducted for mill efficiency. 4: Cell reference corrected to reflect the respective Year	*NFLT_20YrHWPv4_20240416.xlsx* *North Florida Land Trust IFM GHG PLAN_20240416.docx*

Verifier Issue	**Issue ID:**	**23-17**	**Status:** **Closed**	**Checked by:** **SB**	**Date Identified** **11-Jan-24**
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR IFM Methodology v1.3; C3, 3.2	B5	New information request.	Verifiers reviewed the Degrowth – Growth process used to generate the treelist to calculate beginning of reporting period stocks. Please clarify the rationale for using the Excel YEARFRAC function which attributes growth equally across the year, rather than considering the growing season and frost-free days of the region. The latter would more accurately and conservatively attribute growth in the January-February time frame.		*North Florida Land Trust IFM GHG PLAN_20230727.docx* *Annual Growth Rate.xlsx*

		May impact materiality or conformance.	Please update Section B5 of the GHG Plan and/or the modeling methodology to include the specific inventory dates, a description of the degrowth/growth process, a description on the growing season along with any supporting documentation used to define the growing season.	*19007.01_NFLT_Modeling_Methodology_v2.0_20220711.docx*
			April 4, 2024 Findings Verifiers are satisfied with the explanation in support of the use of the YEARFRAC function to attribute growth equally across all months. Verifiers agree FVS cycle lengths produce outputs in 5 year increments (at a minimum) making allocation across shorter temporal units ambiguous. Verifiers are satisfied that this method is producing consistent results across both project and baseline scenarios and will not result in material errors. Furthermore, this method can be applied transparently across reporting periods. This issue is closed.	*North Florida Land Trust IFM GHG PLAN_20240315.docx*

PP Response

Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	The Project elected to consider the entire year when degrowing the inventory data to the start date because FVS outputs growth in 5-year annual increments and any additional specification is arbitrary and does not increase accuracy. We extend the same approach used in FVS if one were to change the cycle length from its default (5 yr for FVS-SN); the five year growth is divided equally into smaller units of time with an equal proportion of the 5 years of growth allocated to each temporal unit. Realistically, a myriad of factors such as soil texture and soil moisture availability are large drivers of growth for the species in this project area (especially the pines), with temperature and photoperiod being additional drivers. However, any such exercise in dividing the growing season into variable rates of growth is not parsimonious and requires additional assumptions over choosing as our default, FVS' logic of equal growth across finer time periods. Given this adds complexity, it may not be warranted given its implication. Considering this would affect both the baseline and project scenario in a similar manner, having slightly different initial diameters will not result in a material error and likely not have any effect on the Net GHG Emissions Reductions/Removals claimed by the Project. The Project notes that in the LetGrow run used for ex ante runs, updating of the project in lieu of disturbance or harvest, and for select baseline plots, the avg annual diameter growth across all trees for the first five years (calculated from the DG column) was 0.1377". In the degrow scenario, DG averaged 0.1374" annually, averaged across all trees. It does not appear that the minor differences in starting diameters have an appreciable impact. Further, when conducting ERT vintage calculations under the ACR Program there is no expectation that Projects in some arbitrary way allocate ERTs based on when growth actually occurred based on Frost Free Days.	

Verifier Issue	**Issue ID:**	**23-18**	**Status:**	**Closed**	**Checked by:**	**SB**	**Date Identified**	**11-Jan-24**

ACR Standard ref	GHG Plan Section	Significance	Issue Description	Comments
ACR IFM Methodology v1.3	Multiple	New information request. *May impact materiality or conformance.*	The following typos were found in the latest version of the GHG Plan: A2 & A4 – Incorrect ACR Standard versions listed (update to v8.0, the most current version). A4 – " Secondly, aerial interpretation was used to removed land identified" – removed vs remove. A7 – Figure 5 X-axis – headings overlap. Y axis units- needs an "e" or "equivalent" added to tCO2 of headings (same issue in Figure 6, pg 46). B1 – "*The methodology used for the North Florida Land Trust is Improved Forest Management Project is the American Carbon Registry*" – awkward wording B2 – Awkward wording: (a) "*The North Florida Land Trust project land that is included in this project is not Federally owned forestland controls the timber rights and can legally harvested*." And (b) "*The North Florida Land Trust Timberlands are managed, and no future harvest is planned within project areas"* – No clear on what is meant by managed? The project lands are managed by NFLT? B5 – Project Area discrepancies between Table 9 and Table 1. B5 Conservation Easement and FL BMPS – "conserved" vs "considered" B5 Conservation Easement and FL BMPS – Table 3 does not exist in BMPs. What is meant by this. B8 – There is incorrect reference to Risk Table mentioned in text (see sentence beginning with *Table 6.* D1 – (a) The QA/QC procedure for a couple of parameters (Tree Decay Class, Live/Dead Status) notes: "*Equipment will be maintained in excellent condition*". This statement does not appear applicable to these inventory measurements.; and (b) HWP – "*recorded on cruise tally sheets*" and "*compare to post harvest cruises*" (not clear on procedure and what is being recorded here) and "*summarized every 5 years*" (shouldn't this be every monitoring period, if a harvest occurs). The following typos were found in the latest version of the modelling methodology: Verifiers identified an additional typo in the latest review on page 9. "conserved should be "considered"? Please review and update as appropriate.	*North Florida Land Trust IFM GHG PLAN_20230727.docx* *silvicultural_bmp_manual.pdf* *19007.01_NFLT_Modeling_Methodology_v2.0_20220711.docx*

			<u>April 5, 2024 Findings</u> **<u>GHG Plan:</u>** A2 & A4: Verifiers understand the provided 2023 ACR guidance (listing and reporting period dates are before 7/2023) allows the project to be verified and validated under ACR Standard v.7.0 but must follow the administrative policies of ACR Standard v8.0. The PP use of ACR Standard 7.0 within the revised GHG Plan is consistent with this guidance. This issue item is closed. A4: Verifiers acknowledge this sentence has been suitably replaced in the stepwise description of roads and their right-of-ways that were removed from the project area. This issue item is closed. A7: Verifiers noted that Figure 5 (pg 12) and Figure 6 (pg 44) have been reformatted and the y-axis now indicates the correct units for the graph within the revised GHG Plan. This issue item remains open as the revised figure numbers for the two noted graphs has changed; they are now labeled Figures 1 and 2 and need to be updated. Please review figure numbering and update as appropriate. B1: Verifiers find the sentence containing the awkward wording has been removed. This issue item is closed. B2: a.) This sentence has been parsed into two and the issue resolved. b.) The awkward sentence verifiers requested clarity on has been replaced with "*The North Florida Land Trust has no future harvest is planned within project areas.*" which needs to be revised for clarity. B5: Verifiers find the project acreage is consistently cited in Table 1 and Table 9 of the revised GHG Plan. This issue item is closed. B5: Verifiers understand the PP reworked this section of the revised GHG Plan. The two issue items pertaining to the Conservation Easement have been addressed and resolved in issue 23-5. This issue item is therefore closed. B8: The reference to Risk Table mentioned in text has been corrected in the revised GHG Plan. This issue is closed. . D1: a.) Tree Decay Class and Live/Dead Status parameters were updated to remove mention of Equipment in QA/QC Procedures in the revised GHG Plan. This issue item is closed.	*North Florida Land Trust IFM GHG PLAN_20240315.docx* *Rideout Point Recorded Conservation Easement.pdf*

			b.) Harvested Wood Products updated to include Monitoring Frequency: "*Annual data summed for the monitoring period",* Reporting Procedure: "*Digitization of slips or receipts; data summarized in monitoring reports; data archived in digital forest inventory*" and QA/QC Procedure: "*Data entry review of digitization of slips or receipts*." This aligns with verifier expectations for HWP. This issue item is closed. **Modelling Methodology** Verifiers understand and have confirmed the modelling methodology has been integrated into the revised GHG Plan. This issue item is closed. **New Findings:** **GHG Plan** Verifiers have noted numerous grammatical errors with word choice and typos picked up by Microsoft Word's review tools. A few examples have been provided: B5/C1: FL BMPs – "that do not post" vs "that do not pose?" B5: "case-by-case" base vs "case by case basis" B5: datasets.. – double period, please update. D1: Tree decay class – "*Declay class category" (*typo) Please review the entire document and update as appropriate. Additional Findings D1: The Area Parameter shows 3,865.05 acres instead of 3868.05. Please update. D1: Tree decay class "*Inventory crew are provided tables for reference in the Inventory SOP for reference."* (double use of for reference) E1: Table 15 is missing the Triangle Preserve - please add E1: Table 17 caption is not correct for the information provided – please update.	
			April 19, 2024 Findings A7.) The latest GHG Plan now lists Figures 5 and 7 correctly. This issue item is closed. B2b.) The sentence highlighted in the issue has been updated to "*The North Florida Land Trust has no future harvest planned within project areas*." This issue item is closed. B5/C1: FL BMPs – updated to "that do not pose". This issue item is closed. B5: Verifiers note the continued use of "case-by-case base" rather than "case-by-case basis"-please update. B5: datesets.. double period has been updated. This issue item is closed.	*North Florida Land Trust IFM GHG PLAN_20240416.docx*

			D1: Tree Decay Class typo, Decay Class QA/QC description, and the Area parameter have all been updated as requested. These issue items are closed. E1: Table 15 is noted to now include the Triangle Preserve – this issue item is closed. E1: Table 17 caption was found to be updated as requested. Please update the contents of this table to reflect the latest project mean for live trees given the updated calculations. This issue remains open until the two remaining issue items have been addressed in the GHG Plan (Sections B5 & E1).	
			<u>April 26, 2024 Findings</u> B5: Verifiers find the PP has removed the phrase "case-by-case base" within the revised GHG Plan and has added specific descriptions on the methods used to adjust the SMZs. This issue item is closed. E1: Table 17 in the revised GHG Plan now reports the latest calculated project live mean of 77.92 mtCO2e/ac which is consistent with the value provided in NFLT_20YrProjectExAnte_ Interpolation_V3_20240416.xlsx. This issue item is closed. All issue items have been addressed, thus this issue is closed.	*North Florida Land Trust IFM GHG PLAN_20240424.docx* *NFLT_20YrProjectExAnte_Interpolation_V3_20240416.xlsx*

PP Response

Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	GHG Plan 1) Per ACR Guidance provided to the VVB, the applicable ACR Standard is the version available at the time of listing. 2) Significantly revised; please see text. 3) The figure has been revised. 4) Revised to " 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." 5) Revised to " The North Florida Land Trust project land that is included in this project is not Federally owned forestland. The North Florida Land Trust controls the timber rights and can legally harvested." 6) Corrected 7) The section on legal constraints has been rewritten and this typo no longer exists. 8) The section on legal constraints has been rewritten and this typo no longer exists. 9) All numbering of tables and table references have been updated. 10a) QA/QC procedure corrected to " Inventory crew are trained on assessment of decay class to reduce variation across observers. Inventory crew are provided tables for reference in the Inventory SOP for reference.". 10b) Monitoring Frequency for HWP modified to " Annual data summed for the monitoring period". Measurement Methodology revised to " Dry weight, or if scaled in volume, weight converted to dry	*North Florida Land Trust IFM GHG PLAN_20240315.docx* *ACR Guidance on Applicable Version of ACR Standard.pdf*

	weight.".QA/QC Procedure revised to " Data entry review of digitization of slips or receipts". Reporting procedure revised to " Digitization of slips or receipts; data summarized in monitoring reports" Modeling Methodology 1) Please disregard the modeling methodology as part of the project's documents package. After addressing other findings, we now have incorporated all information from the modeling methodology into the GHG Plan.	
16-April-2024	23-18-A7 – These figures are now correctly labeled as Figure 5 and Figure 6. 23-18-B2 – The awkward wording the VVB noted has been updated to now read " The North Florida Land Trust has no future harvest is planned within project areas." 23-18-B5/C1 – The GHG Plan has been updated. 23-18-B5 – The GHG Plan has been updated. 23-18-B5 – The GHG Plan has been updated. 23-18-D1 – The GHG Plan has been updated. 23-18-D1 – This parameter has been updated in the updated GHG Plan. 23-18-D1 – This language in the parameter table has been updated in the updated GHG Plan. 23-18-E1 – Table 15 has been updated.	*North Florida Land Trust IFM GHG PLAN_20240416.docx*
26-April 2024	23-18-B5 – "Case-by-case basis" has now been removed from the GHG Plan. 23-18-E1 – Table 17 (now Table 18) has been updated to reflect the updated start date carbon stocks.	*North Florida Land Trust IFM GHG PLAN_20240424.docx*

Verifier Issue	**Issue ID:**	**23-19**	**Status:**	**Closed**	**Checked by:**	**BS/SB**	**Date Identified**	**23-Jan-24**

ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**	**Comments**
ACR Standard v8.0 (2A); ACR IFM Methodology v1.3; A2, C3 (3.1.1), D6,	Noted sections of the GHG Plan, MR & Inventory Methodology	Clarification. *May impact materiality or conformance.*	Verifiers request clarifications within the noted project documents for the following items: GHG Plan (1) A5 (pg 11), third bullet. Is increasing carbon sequestration/storage a project objective? Also, the last sentence in this bullet may have typo in it as it is not clear and not a complete sentence. (2) B8 (pg 26). Supporting calculations are needed for the proportioned CE deduction in Table 14 and/or reference to *NFLT Risk Calculation* workbook (cell B7 -supporting calculations to derive 0.27% deduction). (3) E3 (pg43). Please add a brief description why there is no activity shifting leakage.	*North Florida Land Trust IFM GHG PLAN_20230727.docx* *NFLT_Risk Calculation_V1.xlsx* *AGCO19007.01_NFLT_Inventory_ Methodology_20230727* *acr-monitoring-report-template_version-4-NFLT_20230727*

			(4) F1 (pg 51). Last paragraph. Please define what a "strong stewardship plan" means. Also please clarify that the Conservation Easement currently only is applicable to one strata (Black Creek Preserve 2) within the project area. <u>Monitoring Report</u> <u>(</u>1) Section IV (4) notes: "*…200 plots were randomly selected for measurement*." Appears all plots (except the hazard plot) were measured during the inventory. Please explain what "randomly selected" implies. Also, within this same section, "1/20th" is missing "acre". (2) Section VIII. Additional details needed on site visit date and verification type (full w/ site visit) – See MR Section VIII for ACR requirements. Please revise S&A to S&A Carbon. (3) Attestations. Please include in the appropriate section a note that confirms continuance of project activities and ownership remains clear and uncontested to comply with the GHG Plan Section D (monitoring) and ACR Standard. <u>Inventory Methodology</u> (1) pg 6. ACR Carbon Standard v6.0 is no longer applicable as it is now included in ACR Standard v8.0. Please revise as appropriate. (2) pg 7. "*Plot Safety Concerns: Where a plot becomes unsafe to travel to, a new plot center is established using the most accurate GPS position possible and measurements taken using the same methods."* While we understand the safety considerations, re-locating plot centers introduces inventory bias (see Issues # 11 & 14). Please review and revise this note and other references to re-locating plot centers where appropriate. (3) pg 19. Item 5 on inventory update procedures. Please reference the GHG Plan section D that fully describes the inventory update process following a natural disturbance event.	
			<u>April 11, 2024 Findings</u> <u>GHG Plan</u> (1) Verifiers note the addition of "increased carbon storage" in the description of the project activity. This portion of this issue item is closed. Verifiers still find the last sentence of this section is an incomplete sentence. Please update "*The seasonal wetlands and proximity to the St. Johns River Water Management District ("SJRWMD")."* (2) Verifiers recognize the entirety of Black Creek Preserve is encompassed within the Rideout Point Recorded Conservation Easement. The Black Creek Preserve accounts for	*NFLT_Risk Calculation_V1_20250315.xlsx* *North Florida Land Trust IFM GHG PLAN_20240315.docx* *ACR722_NFLT-monitoring-report-template_20240315.docx* *AGCO19007.01_NFLT_Inventory_Methodology_20240315.docx*

			13.56% of the project area. 13.56% of the overall -2% Conservation Easement Deduction accounts for the -0.27 in the PP's risk score. This issue item is closed. (3) Section E3 of the GHG Plan now includes "*The Project will not have any activity shifting leakage as NFLT has no planned commercial harvesting operations and the NFLT has Forest Management Plans that cover all properties within their ownership.*" Verifier checks of ownership and FMP coverage align with this attestation. This issue item is closed. (4) Section F1 of the GHG Plan states "*The project area has a stewardship management plan, demonstrating high quality sustainable management, and a Conservation Easement on the Black Creek Preserve 2 held by SJRWMD preventing development and overharvesting of the property in addition to safeguarding its conservation values.*" This section adequately aligns the stewardship management plan with high quality sustainable maintenance. Verifiers also find this section now describes that the Conservation Easement is only present in one strata (Black Creek Preserve) of the project area. This issue item is closed. <u>Monitoring Report</u> (1) Verifier find the monitoring report now references both the GHG Plan and Inventory Methodology document in describing the plot allocation and plot size information. The description includes details regarding the inventory dates and credits a Registered Professional Forester with the design. This issue item is closed. (2) Section VIII Verification now includes the following "*First Verification with site visit by S&A Carbon in the Fall of 2022 (10/31/2022-11/4/2022*" which meets the instructions laid out the in the monitoring report to include whether the project is undergoing a full site visit verification, the date of the full site visit verification, and the name of the verification body. This issue item is closed. (3) Verifiers find both Section III(1) and Section V(2) have been updated as follows: "*During the monitoring period the Project continues to be implemented as described in the GHG Plan and ownership remains clear and uncontested*." This meets verifier expectations and complies with GHG Plan Section D and the ACR Standard. This issue item is closed. <u>Inventory Methodology</u> (1) Verifiers find the inventory methods now references ACR Forest Carbon Project Standard v7.0 which is consistent with the ACR guidance provided. This issue item is closed. (2) The "*Plot Safety Concerns*" section of the Inventory SOP has been updated to include information about the implication of hazard plots encountered in later reporting periods	*ACR Guidance on Applicable Version of ACR Standard.pdf*

			and inventories. Specifically, "*If the hazard is temporary, it shall be noted as such and every effort shall be made to revisit the plot prior to the end of the current reporting period or as soon as the hazard is no longer present. If the hazard is permanent, it shall be noted as such and not measured*". Verifiers request additional clarification be added in the event of a permanent hazard plot. Specifically, if a plot is not measured, it should be assumed to have zero carbon. Please update to provide clarification for long term monitoring. (3) Verifier find the GHG Plan "*Procedures for Early Re-inventory"* section has been pasted into the Inventory SOP Section 5 which meets the verifiers request in this issue. Please incorporate the carriage return in the second block of text in the Inventory SOP.	
			April 19, 2024 Findings (1) Verifiers acknowledge the requested sentence to be clarified was revised as follows: "*The project will protect wetlands within the project area due to the project's proximity to the St. Johns River Water Management District ("SJRWMD") will provide water quality benefits to the SJRWMD.*" This sentence remains awkward and unclear. Please revise as appropriate. (2) The PP has updated the "*Plot Safety Concerns*" section of the inventory SOP to address hazard plots identified and not measured during the initial and later project reporting periods. Specifically, plots determined to be temporary unmeasured hazard plots in future reporting periods "*should be treated as zero tally plots with values of zero used in the carbon quantification."* This satisfies the VB's request that clarification be added to this section for long-term monitoring purposes. This issue item is closed. (3) Verifiers found the carriage return has been added as requested to the "*Procedures for Early Re-Inventory*" section of the Inventory SOP. This issue item is closed.	*North Florida Land Trust IFM GHG PLAN_20240416.docx* *AGCO19007.01_NFLT_Inventory_Methodology_20240416.docx*
			April 26, 2024 Findings (1) Verifiers found the noted awkward sentence has been revised in the updated GHG Plan to read: "*The project will protect wetlands within the project area providing direct water quality benefits to surrounding areas*". As the needed clarification has been provided, this issue item is closed. As all issue items have been resolved, this issue can now be closed.	*North Florida Land Trust IFM GHG PLAN_20240424.docx*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	GHG Plan 23-19(1)- GHG Plan has been updated. 23-19(2)- See the NFLT_Risk Calculation.xlsx 23-19(3)- GHG Plan has been updated. 23-19(4)- GHG Plan has been updated. Monitoring Report 23-19(1)- The MR has been revised.	*North Florida Land Trust IFM GHG PLAN_20240315.docx* *NFLT_Risk Calculation_V1_20250315.xlsx* *ACR722_NFLT-monitoring-report-template_20240315.docx*

	23-19(2)- The MR has been revised. 23-19(3)- The MR has been revised. <u>Inventory Methodology</u> 23-19(1)- This has been updated to Standard v7.0 23-19(2)- This has been revised, accounting for the recent ACR guidance regarding attribution of carbon stocks when hazards are present, "If the hazard is temporary, it shall be noted as such and every effort shall be made to revisit the plot prior to the end of the current reporting period or as soon as the hazard is no longer present. If the hazard is permanent, it shall be noted as such and not measured." 23-19(3)- The passage on disturbances in the inventory methodology has been updated to align with procedures laid out in the GHG Plan.	
16-April-2024	23-19(1)- The GHG Plan has been updated to now include a complete sentence. <u>Inventory Methodology</u> 23-19(2) – Plot Safety Concerns in The Inventory SOPs has been revised by incorporating, near verbatim, guidance from ACR and clearly stating that if a plot cannot be measured for either a permanent or temporary plot, then the plot should be treated as a no-tally plot and given a value of 0 in the Project quantification. 23-19(3) – corrected per request from VB.	*North Florida Land Trust IFM GHG PLAN_20240416.docx* *AGCO19007.01_NFLT_Inventory_Methodology_20240416 .docx*
26-April-2024	23-19(1)– This sentence has been revised.	*North Florida Land Trust IFM GHG PLAN_20240424.docx*

<u>Verifier Issue</u>	**<u>Issue ID:</u>**	**<u>23-20</u>**	**Status: Closed**	**Checked by: EM**	**Date Identified 23-Jan-24**
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR IFM Methodology v1.3; C3, 3.2		New information request. *May impact materiality or conformance.*	Verifiers are requesting a more detailed description of how the baseline and ex-ante calculations connect. In addition to the description of how the data flows from the Inventory to FVS to Outputs and Calculation Workbooks, verifiers have noted the following files that have not been provided: 1. The FVS input and output files and databases used to model the baseline. 2. The ERT file references " NFLT_20YrBaseline_Interpolation.xlsx", this file does not appear to have been provided.		*North Florida Land Trust IFM GHG PLAN_20230727.docx* *19007.01_NFLT_Modeling_Methodology_v2.0_20220711.docx*
			<u>April 12, 2024 Findings</u> Verifiers have received and reviewed all relevant data for the baseline. On April 3, 2024 a call was held to clarify modeling methodologies and the flow of data and additional workbooks regarding the regeneration were received and reviewed. After reviewing the data in detail, verifiers have the following item to clarify:		*Baseline Folder* *Baseline/Baseline_Input_Data Folder* *Baseline/Baseline Final Folder* *Baseline/Baseline HWP Folder*

			1. In the code within the "NFLT_NPV_Preworkup" database, the softwood and hardwood "TCuFT" and "McuFT" are adjusted using factors 0.88 and 0.85 respectively to create "Stump_TCuFT" and "McuFT" variables. Verifiers have been unable to determine the source or documentation for the factors used. Please clarify the source of the 0.88 and 0.85.	*Baseline/NPV Workup Folder ModelingUnits_20240315.xlsx*
			<u>April 22, 2024 Findings</u> Verifiers have reviewed the revised NPV analysis workbook and the NPV preworkup database and agree that the baseline modeling/treatment selections have not been affected. Verifiers are satisfied with this response and the issue is closed.	*NFLT_NPV_Analysis_V3.1_20240416.xlsx* *NFLT_NPV_Preworkup_v2.accdb*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	23-20 – The project has provided two additional files that will help the VVB understand the flow of the both the baseline and project quantification, specifically the VVB has provided a modeling document (Finding_23-20-Additional Modeling Methodology for VVB_20240315.docx) and a excel workbook (19007.01 - Document Walkthrough List for VVB.xlsx) that serves as a file walkthrough for the VVB for the Additionality, Baseline (including NPV), ExAnte20YearCalcs folders. There is also information related to the GIS files that have been provided in this folder. Additionally, the Project is formally requesting to hold a Calculation Walkthrough call with the VVB or the Project is willing to do a calculation walk through in that is recorded and submit this to the VVB. 23-20(1) – The project has provided the FVS Input, Output, and all relevant databases and files. Please see the Baseline/FVS Inputs folder and the ExAnte20YearCalcs/FVS Runs folder. 23-20(2)-The Project requested via email a list of the documents that the VVB currently has; however, this has not been provided. The Project is submitting all documentation for the VVB's review. The Project is happy to answer any questions the VVB may have via calculation walkthrough calls, emails, etc. and is requesting that the VVB actively reach out to the Project at any point during their review so we can address any questions about the quantification flow as they come up.	*Baseline Folder* *Baseline/Baseline_Input_Data Folder* *Baseline/Baseline Final Folder* *Baseline/Baseline HWP Folder* *Baseline/NPV Workup Folder* *ModelingUnits_20240315.xlsx*
16-April-2024	23-20-1 – The Project has removed these from the NFLT_NPV_Preworkup.accdb. However, the removal of these values has not changed the results of the NPV analysis because these values while changing the absolute value of the final NPV, these parameters do not affect the within plot NPV results to determine when and if the Plot should be harvested. Specifically, since these values were applied to every single plot for every single year, the NPV decision to harvest or not to harvest does not change. Additionally, in the last submission the minimum volume harvest entry point used direct FVS outputs and therefore MCuft was never adjusted to account for stump volume. The Project has provided updated NPV documents where these parameters were removed and demonstrates that inclusion/exclusion of these parameters have no impact on the final baseline schedule. Additionally, the VVB noted that the NPV reported in the GHG Plan has been updated.	*NFLT_NPV_Analysis_V3.1_20240416.xlsx* *NFLT_NPV_Preworkup_v2.accdb*
26 April 2024		

Verifier Issue	Issue ID:	23-21	Status: Closed	Checked by: BS/SB	Date Identified 23-Jan-24
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR GHG Project Plan template v3.0		Non conformance. *May impact conformance; no materiality*	Verifiers noted some missing information in the GHG Plan. To comply with ACR GHG reporting template requirements please include the following items: (1) A8 (pg 14). Information needs to be added for (a) *Entities holding title to the carbon credits*; and (b) *Entities holding title to the land, timber, mineral, and other relevant real assets within the project area (if applicable).* (2) E5 (pg 44). As noted in the ACR Template: *Describe how the methodology has been applied and show how Total GHG Emission Reductions and Removals are quantified, taking into account leakage and uncertainty. Provide calculation steps where relevant*. Also, Figure 6 is included but not referenced in text, please review and update as appropriate.		*North Florida Land Trust IFM GHG PLAN_20230727.docx* *GHG Project Plan (ACR Template V3.0, July 2023)*
			April 12, 2024 Findings (1) Verifiers find that Section A8 of the GHG Plan now indicates "*the Project Proponent (North Florida Land Trust) holds clear and uncontested titles to all ownerships included in the Project Area, including but not limited to carbon credit rights, land rights, timber rights, mineral rights, which can be demonstrated through a review of the land title and deeds."* This issue item is closed. (2) Section E5 of the GHG Plan now includes reference to method equations in addition to the Reductions and Removals by Year results which take into account Leakage, the Buffer Pool, and Uncertainty. This portion of the issue item is closed. Verifiers find that Figure 6 (now erroneously listed as Figure 2) remains without a reference in the text. Please update as appropriate.		*North Florida Land Trust IFM GHG PLAN-v1- 2022-07-07.docx*
			April 19, 2024 Findings (2) Verifiers note the Figure 6 description reference has been added to the revised GHG Plan text. However, verifiers note there appears to be a difference in font size particular to this section. Please review and revise as appropriate.		*North Florida Land Trust IFM GHG PLAN_20240416.docx*
			April 26, 2024 Findings (2) The noted font size differences in the Figure 6 description has been corrected in the revised GHG Plan. This issue item is closed. As all issue items have been resolved, this issue can now be closed. .		*North Florida Land Trust IFM GHG PLAN_20240424.docx*
PP Response					
Date	***PP Comment***			***Additional evidence submitted for review by PP***	

15-Mar-2024	23-21(1) – GHG Plan has been updated. 23-21(2) – GHG Plan has been updated.	*North Florida Land Trust IFM GHG PLAN_20240315.docx*
16-April-2024	23-21(2) – GHG Plan has been updated and Figure 2 is now appropriately listed as Figure 6. Additionally, the title of the Figure 6 has been included as sentence in the text. The Project has also updated Figure 1 to Figure 5 which was incorrectly referenced. The Project has also included a reference in the text to Figure 5.	*North Florida Land Trust IFM GHG PLAN_20240416.docx*
26-April-2024	(2) This error has been corrected.	*North Florida Land Trust IFM GHG PLAN_20240424.docx*

Verifier Issue	**Issue ID:**	**23-22**	**Status:**	**Closed**	**Checked by:**	**BS/SB**	**Date Identified**	**23-Jan-24**
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**				**Comments**	
ACR Standard, v8.0 2.B.2, 2.B.3, 2.B.4; 4.A.1; ACR IFM Methodology v1.3; B4, C1	GHG Plan-Legal Constraints B5; Modeling Methodology 4.4	Possible non conformance. *May impact materiality or conformance.*	The baseline constraints in the GHG Plan (B5) and Modeling Methodology documents (4.4), includes the legal constraints associated with Silviculture Best Management Practices (BMPs) for wetlands (Florida Forest Service, 2008). These project documents, however, do not describe nor include the legal constraints for the BMPs for streams, lakes and sinkholes (i.e., Special Management Zones – SMZs and associated harvesting restrictions). To comply with the noted sections of the ACR Standard and the IFM Methodology, verifiers request the project documents be revised to address and/or clarify the following: (1) A description along with the associated specifications for the BMPs incorporated into the baseline model for streams (Primary Zone Criteria, FL BMP page 4) and lakes (and sinkholes if applicable). (2) How the stream bed widths (Table 1, pg 8 of BMP) were classified for the various stream sizes within the project area and how these widths were addressed in delineating the SMZ widths (SMZ widths begin at edge of channel/top of stream bank). (3) The source for the spatial data and/or process used to define the stream types within the project area (e.g., perennial & intermittent). Verifiers acknowledge the PP has provided spatial data which depicts this stream classification (*Stream Clip.*shp). However, there is no reference to this spatial data in the GHG Plan nor the Modeling Methodology (e.g., how it was determined and source data utilized). Please include these details and any supporting spatial data that might have been used. Also, verifiers find the PP's spatial data for perennial streams aligns reasonably well with NHD flowline spatial data (Florida_National_Hydrography_Dataset_(NHD)_-				*North Florida Land Trust IFM GHG PLAN_20230727.docx* *19007.01_NFLT_Modeling_Methodology_v2.0_20220711.docx* *Lowder_Stream_Clip.shp* *Lowder_Stream_buffer.shp*	

			Flowlines(24k).shp), except for the stream in Trail Ridge Preserve (along Plots 126 and 146). Based on the NHD data and aerial imagery assessments (width of riparian area) this stream appears to be a perennial stream. Please review, clarify and/or update as appropriate. (4) The PP appears to have provided the spatial data for the modeling constraint area associated with the BMPs of these perennial streams (*Lowder stream buffer.shp*). Please include reference/description of this submitted spatial data within the appropriate project documents. (5) Verifiers find some BMP buffer areas have not been identified and are missing in the *Lowder stream buffer* spatial data (we assume these align with the required SMZ widths noted in the FL BMP document?). Some examples include: Black Creek River and Six Mile Creek SMZs (Black Creek River and Sixmile Creek Preserve, respectively); Six Mile Creek backwater area near Plot 101); and ponds/lakes (e.g., North of Plot 152 in the Trail Ridge Preserve). Please review and address/clarify as appropriate. (6) Regarding the *Lowder stream buffer* spatial data, some stream SMZ buffer area widths appear to be underestimated. As an example, see stream to east of Plot 248 within the Ortega River Preserve. The 200 ft buffer width on each side of the stream appears to have been started from the centerline of the stream spatial data. To comply with the BMPs the SMZ buffer width should start from the edge of channel, which is generally visible in the aerial imagery for this stream (FL NAIP 2021). Verifiers recognize channel edges can not always be seen via aerial imagery for smaller streams or those with dense riparian vegetation, there are areas within the project area, especially the larger rivers a more accurate and conservative approach is needed in defining these SMZ areas. Please review and update as appropriate (7) Are there sinkholes, Class I rivers/streams, or Outstanding Florida Waters present in the project area? If they are, please include the source data and the baseline constraints associated with them.	
			<u>April 9, 2024 Findings</u> (1) Verifiers find that section B5 Baseline - Florida Best Management Practices section of the GHG Plan now describes the application of the BMP guidelines to the baseline constraints. The PP noted that the project area includes only perennial water, perennial lakes and is devoid of sinkholes, Outstanding Florida Waters, Outstanding Natural Resources Waters and Class I Waters. Specific guidelines in the GHG for wetland areas includes the following:	*NHD – Florida National Hydrology Dataset* *NWI Wetlands Inventory– Florida State Data* *NFLT_BaselineRx_20240307.shp*

			"All standing dead trees that do not post a safety concern are retained. In wetlands less than 200 acres in size, at least 3 to 5 live trees per acre are retained. In wetlands at least 200 acres in size, at least 1 to 2 live trees per acre are retained. Specifically, the modeling retained all standing dead trees (snags) and conservatively retained 5 live tree per acre." This aligns with and is more conservative than what is documented on pg 18 of the FL BMP Manual. The PP further elaborates on the sources used and the delineation steps for SMZs and the primary zone buffers required for each stream width. Verifiers note, the BMP guidelines indicate there are no timber harvesting limitations in the Secondary Zone (pg 5 BMPs) so all instances of SMZs for this project area were given Primary Zone constraints and assigned "Let Grow" in the baseline. This is conservative. Verifiers find the description provided is adequate in understanding how the GIS project acres align with model prescriptions. This issue item is closed. (2) Verifiers understand the PP estimated the stream width for each NHD Flowline stream in the project. This is outlined in the GHG Plan as follows: Verifiers were able to confirm using the latest GIS data for the project that the CMZs were delineated conservatively given the width of the stream. This issue item is closed. (3) Verifiers acknowledge Section B5 Florida Best Management Practices of the GHG Plan now includes a description of the PP's data source, and method for locating and determining stream widths. NHD Flowline data was used and the stream class/width was determined on a case by case basis across the project. While this was not applied systematically, verifiers were able to determine a limited number of these streams existed within the project and the estimates of their widths were found to be reasonable. NHD Area data was used find streams >40' in width which were delineated using aerial imagery. Verifiers found the latest spatial data (SMZs) follows the NHD flowlines for the project area. This issue item is closed. (4) Verifiers noted Lowder stream buffer.shp has been replaced by NFLT_BaselineRX.shp which now clearly aligns with the NWI wetlands and NHD flowlines / waterbodies spatial data for the constraints described in the GHG Plan. Given the source data provided within	*FL DEP Data Layers:* *Outstanding_Florida_Waters.shp* *Outstanding_Florida_Springs_(OFS).shp* *Surface_Water_Class_Boundaries_(lines).shp* *Surface_Water_Class_Boundaries_(areas).shp* *Florida_Subsidence_Incident_Reports.shp* silvicultural_bmp_manual.pdf (fdacs.gov)

Stream Width	CMZ	BMP SMZ
<20'	10'	35'
20-40'	20'	75'
>40'	Aerial imagery	200'

			the revised GHG Plan the specific source data for the Lowder stream buffer file no longer needs to be described in the GHG Plan. This issue item is closed. (5) a.) Verifiers still find some BMP buffer areas have not been identified and are missing in the *BaselineRx* spatial data. Specifically, verifiers seek clarification regarding how the SMZs were determined along Black Creek, the Ortega River, and Sixmile Creek. These do not appear to follow the BMP guidelines for a 200' SMZ along a stream > 40' in width. Please clarify or update as appropriate. b.) Verifiers determined that perennial lakes and ponds near and surrounded by project acres now have a 35' SMZ. The VB reviewed the NHD Waterbody data to isolate areas in the project that were deemed perennial ponds. The VB agrees with the PPs assessment of these areas and that not all NHD Water bodies are perennial in nature and require an SMZ. Their removal from the project is reasonable. The lakes and ponds remaining have an SMZ that aligns with the BMPs. This issue item is closed. (6) As described in 23-22(5a) above, the issue of 200' buffer widths on each side of streams >40' in width does not appear to have been resolved. Please clarify or update as appropriate. (7)Verifiers were able to confirm the PP assessment that no sinkholes (Florida Subsidence Incident Reports – FL DEP), Class I rivers/streams (Surface Water Boundaries lines/areas FL DEP), or Outstanding Florida Waters or Springs (Outstanding Florida Waters / Springs – FL DEP) existed within or abutting the project area. This issue item is closed. <u>New Finding</u> (8) The GHG Plan indicates an SMZ of 50' was applied near the edge of streams recharging from or discharging into a wetland. Please clarify how these areas were isolated in the wetlands and flowline source data.	
			<u>April 22, 2024 Findings</u> 5a) The PP has provided the requested clarifications on the process used to delineate the SMZs around water resources within the Black Creek, Ortega River, and Sixmile Creek Preserves. For some of the water resources within these parcels verifiers understand the PP has applied Appendix 11 (Exception 1) of the FL BMPs, which states: "No *individual tract or tracts-in-contiguous-ownership may be required to designate more than 10% of the total tract area as Primary Zone, provided that no clearcutting takes place within 35 feet of any perennial waterbody or within 50 feet of any OFW, ONRW, or Class I Water*".	*North Florida Land Trust IFM GHG PLAN_20240416.docx.* *NFLT_BaselineRx_20240415.shp* *FL BMPs*

			While the PP has provided the requested description on the SMZ delineation process utilized in the revised GHG Plan, specific aspects of the use of Appendix 11 were unclear to verifiers, specifically in how "tract" and "contiguous" were defined. To further understand the assumptions used and methods applied, verifiers conducted a conference call with the PP on April 19, 2024. As a result of this call, some aspects of the PP's methods were explained while other definition aspects needed further review. To gain additional clarity verifiers contacted the Florida Forest Service (BMP Program Manager, Robin Holland). Based on Appendix 11 discussions with Robin Holland on April 21, 2024, verifiers understand the following: • The intention of Appendix 11 (Exception 1) is directed toward small parcel acreages. This exception provides some compromise in the SMZ' BMPs to allow landowners with a relatively high proportion of water resources to implement harvesting on small acreages while also protecting water resources. • This exception is rarely applied. • The 10% of the SMZ area threshold is based on each individual water resource's SMZ area in a tract (i.e., for each stream, river, pond, etc.) not a cumulative total of the SMZ area for a given tract. • "tract" is used in context to the parcel's ownership area. • Robin was not aware of an existing FL Forest Service definition for "contiguous". She suggested checking the FL statutes (VB found one in 591.17- contiguous sale area). On April 21, 2024, verifiers conducted a conference call with the PP to discuss these findings. As the PP's application of Appendix 11 (assessing the 10% SMZ area threshold) is currently based on the use of the total SMZ area for all water resources in a given tract rather than assessing the 10% SMZ area at the individual water resource level, verifiers understand the PP intends to review these Appendix 11 findings and revise the project documents as needed. Verifiers also understand the PP will include a description in the GHG Plan to clearly define the process/assumptions utilized if Appendix 11 (Exception 1) is applied for specific tracts. As such, this issue item remains open. Verifier data checks can confirm all other non-adjusted SMZ areas align with the BMP specifications. And as mentioned, has been adequately described in the GHG Plan as requested. This aspect of this issue item is closed. 6) This item is now being addressed in item 5a and so has been closed. 8.) Verifiers appreciate the clarification regarding the identification of streams connected "to the inflow and/or discharge point of a flowing wetland". Verifiers were able to identify the two areas listed by the PP when reviewing the NHD endpoints and their presence in	

			an NWI wetland. The manual updates to SMZs were conservative given the "*50' beyond the defined channel into the wetland*" as stated in the FL BMP guidelines. This issue item is closed. <u>New Findings</u> 9). Where SMZ areas are being adjusted based on the application of BMP Appendix 11 (Exception 1 as noted in issue item 5a above), please provide (1) a description of the methods used to revise the SMZ boundaries of a given water resource (e.g., stream) to assure they were systematically and consistently applied and to enable the verification that these boundaries were accurately implemented as intended; or (2) the supporting evidence/documentation to justify utilizing variable SMZ widths as currently depicted in the spatial data for the noted three NFLT Preserves. 10.) Verifiers noticed where SMZ buffers have been adjusted based on the application of FL BMP Appendix 11 (reduced SMZ area to <10%), the revised SMZ boundaries are irregular; the SMZ width is variable. Where variable adjustments have been made to the SMZs please clarify how the delineation around plots was determined. The spatial data indicates that plots that could have been included in the revised SMZ area, are currently located outside the SMZ (e.g., Plots 98, 100 & 101 in the Sixmile Preserve). The inclusion/exclusion of plots from the SMZ area will affect the results of the NPV and the calculation of ERTs. If Appendix 11 is applied for the given tracts and a variable width is utilized, please provide supporting documentation that the PP's approach is conservative and immaterial on ERTs.	
			<u>April 25, 2024 Findings</u> 5a.) Verifiers find the revised GHG Plan now includes a description clearly defining the process/assumptions made when utilizing FL Silvicultural BMP Appendix 11 (Exception 1). Verifiers understand there are three areas within the project area where Appendix 11 was utilized to reduce the SMZ width. Specifically, the revised GHG Plan states "*the SMZ width where the SMZ encompasses over 10% of a given tract or tracts-in-contiguous-ownership, provided that the SMZ edges are no less than 35' from the stream bank.*" Verifiers concurs with the PP's process and determination of "tract" boundaries as described in the revised GHG Plan. Specifically verifiers understand Black Creek Preserve and Ortega River Preserve were each considered as single tracts / tracts-in-contiguous ownership, which is now clearly described in the revised GHG Plan: "*because the geographically-overlain legal parcels in these strata were adjoining (i.e., sharing a common boundary) or, if disjunct, not separated by parcels of a different ownership (i.e., parcels owned by NFLT were separated by transportation infrastructure rather than a parcel*". Sixmile Creek Preserve was considered as two tracts (north and south) because they "*were geographically separated by parcels of other ownership*". Verifiers find the tract definition used by the PP is reasonable, practical and logical and aligns with the FL FS	*NFLT_BaselineRX_20240425.shp* *NFLT_SMZ_20240307.lpkx* *North Florida Land Trust IFM GHG PLAN_20240424.docx*

			BMP regulatory specifications (i.e., discussions with Robin Holland -FL FS BMP program manager). Additionally, the revised GHG Plan provides descriptive process details used to adjust SMZs per Appendix 11 by iteratively applying SMZ widths in 5' increments in order to obtain an SMZ area of approximately 10% (for the selected and applicable Appendix 11 tracts where SMZ areas exceeded 10%). Verifiers confirmed the following SMZ adjustments were completed based on the NHD source data for the noted three areas where Appendix 11 was applied. Verifiers' overall acres and adjusted SMZ acres aligned with the PP's acre values provided in Table 9 in the GHG Plan. Additional details on the verifiers findings are provided below, which agree with the PP's methods described in the revised GHG Plan and attributes of the spatial data. a.) Ortega River Preserve – The Ortega River SMZ was defined using the NHD Flowline with PP estimates of the stream channel width of 80' which was found to be conservative. An SMZ of 80' on one side was confirmed resulting in a total of 10.2% of acres in SMZ. b.) Sixmile Creek Preserve (North) – The Sixmile Creek confluence with the Saint Johns River SMZ was defined using NHD Areas with a confirmed SMZ of 110' which resulted in 10.5% of acres in SMZ. c.) Black Creek Preserve – The Black Creek SMZ was defined using the NHD Areas with a confirmed SMZ of 165'. A total of 10.4% of the management area are SMZ. There is a discrepancy in Table 9 of the GHG Plan for adjusted SMZ buffer width for Ortega River Preserve. Verifiers believe this needs to be updated to 80 ft. Please review and update as appropriate. 9.) Verifiers find the revised GHG Plan describes an updated process for determining SMZ widths that is systematic across project tracts. Although the resulting SMZ widths are variable within each analyzed tract the methods are consistently applied, meet BMP regulatory specifications, and are verifiable (confirmed in GIS). This issue item is closed. 10.) As noted in the items above, the PP's process for determining SMZ adjustments has been revised and has been adequately described and systematically applied. This issue item is no longer relevant and is closed. All issue items except for 5a have been adequately addressed and closed. This issue remains open.	
			<u>May 7, 2024 Findings</u>	*North Florida Land Trust IFM GHG PLAN_20240507.docx*

			5a.) The Adjusted SMZ Buffer Width for the Ortega River in Table 9 of the revised GHG Plan has been corrected to 80'. This issue item is closed. All issue items have now been resolved and this issue is now closed.	

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	Additional description has been provided in the GHG Plan and Modeling Methodology to state what data were used to identify waterbodies and construct SMZs. This work has been completely re-done. The associated data have been provided. The project used the latest NHD data. Specifically, - NHD Waterbodies. These were visually inspected to identify perennial lakes and ponds. If aerial photos revealed these were dry at some point in time, they were interpreted as intermittent and removed. Per the Florida BMPS, a 35' buffer was established from the edge of the perennial lakes and ponds. - NHD Area. These are generally wider streams and coves. Per the Florida BMPS, a 200' buffer was established from the edge of these. Some of these may have covered forested wetlands and were removed after review of aerial photography. - NHD Flowlines. These were reviewed against aerial imagery to classify streams as either above 40' in width, under 20' in width, or in between. Streams classed as under 20' were given a 10' buffer on each side of the line to conservatively delineate stream banks. Streams classed as 20'-40' were given a 20' buffer on each side of the line to conservatively delineate stream banks. For streams above 40', we estimated the stream width using aerial imagery to apply a buffer and delineate stream banks. Next, the appropriate SMZ width was buffered from the stream banks. Any area that was both classified as stream or SMZ and also wetland (according to the natl wetlands inventory) was assigned SMZ as this was more conservative. We are not aware of any sinkholes within the project area. The Florida Geological Survey maintains an interactive map of known sinkholes; none occur within the project area. https://ca.dep.state.fl.us/mapdirect/?focus=fgssinkholes. Using the Florida Department of Environmental Protection Geospatial Open Data portal, we downloaded the layer for Outstanding Florida Waters; no Outstanding Florida Waters occur within 200' of the project area. Using the Florida Department of Environmental Protection Geospatial Open Data portal, we downloaded the 'Surface Water Class Boundaries (areas)' layer; no Class I or II waterbody occurs within 10 miles of the project area. The Project Proponent believes this should address all of the subfindings adequately.	*NFLT_SMZ_20240307.lpkx* *NFLT_BaselineRx_20240307.zip* *NFLT_Plot_Grid_BaselineRx_20240307.zip* *NFLT_Plot_Grid_Baseline_Rx_198* *Plots_DroppedPlotsExcluded.zip* *NFLT_stratum_20240305.zip*
16-April-2024	5a) The VVB reviewed the Preserves containing or adjacent to any streams at least 40' in width (as identified last round by the Proponent in 'Step 2' Linear Streams to Area' geospatial layer (OIDs 1, 2, 3) and 'NHDArea-Streams' (OID 1).	*NFLT_BaselineRx_20240415.zip* *North Florida Land Trust IFM GHG PLAN_20240416.docx*

	'NHDArea-Steams' (OID 1 and note OIDs 2 and 4 are duplicative) contains SixMile Creek, adjacent to Sixmile Creek Preserve and Black Creek, adjacent to BlackCreek Preserve. The SMZs are delineated manually here as buffer widths are adjustable where SMZ exceeds 10% of the tract, provided that the buffer distance is at least 35'. See Appendix 11 of the Florida Silvicultural BMPs stating "No individual tract or tracts-in-contiguous-ownership may be required to designate more than 10% of the total tract area as Primary Zone, provided that no clearcutting takes place within 35 feet of any perennial waterbody". Note in the far northwestern tract of Sixmile Creek Preserve, 11% of the area is designated as SMZ (approx. 16 acres SMZ and 113.5 acres non-SMZ) and any non-SMZ designated areas are at least 35' from the delineated stream edge. In the adjacent near-northwestern tract, 8.9% of the area is designated as SMZ and the buffer width is 200'. No 40' streams in the southwestern tracts. Note in the southern tract of Ortega River Preserve, 12% of the area is designated as SMZ (6.6 acres SMZ, 51.4 acres non-SMZ) and any non-SMZ designated areas are at least 35' from the delineated stream edge. In the northern tract of Ortega River Preserve, 11% of the area is designated as SMZ (approx. 2.3 acres SMZ and 18 acres non-SMZ) and any non-SMZ designated areas are at least 35' from the delineated stream edge. In Black Creek Preserve 2, which contains Grog Creek as well as Black Creek, the southwestern tract was 14.1% SMZ (approx. 48.2 acres SMZ and 245.3 acres non-SMZ) and any non-SMZ designated areas are at least 35' from the delineated stream edge. In the Northeastern tract, SMZ buffer width is 200'. Revisions include: Table 9 in the GHG Plan has been updated to account for the revision in Black Creek and Ortega River Preserves and, a revised NFLT_BaselineRX_20240415.shp. The VB asked how these SMZs were determined. The Proponent refers the VB to the GHG Plan. We have added additional detail there which may clarify this subfinding. 6) Aside from the three instances previously discussed, the only other waterways identified by the Proponent as having a width of at least 40' area: Grog Branch (OIds 2 & 3 in 'Step3 Linear Streams SMZ). This is addressed in sub-finding 5 above. 8) To conform to the Florida Silvicultural BMPs, we did a manual sweep with both the NHD layers and the Wetland layer to examine if any NHD streams' end points were located in areas identified as wetlands. In these two instances (i.e., 82.0358894°W 30.0934768°N and 82.0631501°W 29.9156291°N), we modified the NFLT_BaselineRx layer to extend the SMZ in a single direction by visually assuming the stream continued for an addition 50' ala Figure 4 in the Florida Silvicultural BMPs document. Note that conformance to this rule leads to a lengthened SMZ but does not alter the width of the SMZ around the point of stream termination. No revisions were made in this round in addressing this sub-finding.	
26-April-2024	5a) The Project Proponent has revised project documents following discussing with the Verifier. The PP notes the following key statements added to the GHG Plan, B5. First, "… the width of SMZs associated with three specific streams in the project area were adjusted… For these three streams, the project	*NFLT_BaselineRx_20240425.shp* *NFLT_Plot_Grid_BaselineRx_20240425.shp*

evaluated the area of SMZs associated with a range of SMZ half-widths from 35 to 200 feet, in intervals of 5 feet, and then selected the SMZ width which yielded the smallest acreage of SMZ provided the SMZ acreage was no less than 10% of the acreage of the tract or tracts-in-contiguous-ownership.". This should describe, in a repeatable and transparent manner, the process by which multiple potential SMZs were calculated and a single SMZ for each of the three streams was selected.
The GHG Plan also contains language stating tracts are areas within the project area associated with a parcel. Specifically, we write: " Within the project area, the strata, Ortega River Preserve, Trail Ridge Preserve, Putnam Lakes, Black Creek Preserve 2, and Triangle Preserve were considered each as a single tracts or tracts-in contiguous-ownership because the geographically-overlain legal parcels in these strata were adjoining (i.e., sharing a common boundary) or, if disjunct, not separated by parcels of a different ownership (i.e., parcels were separated by transportation infrastructure rather than a parcel). However, the project area within the two strata Little Rain Lake – Milam Preserve and Sixmile Creek Preserve were within parcels that were geographically separated by parcels of other ownership. Consequently, the project area within these two strata were subdivided into two tracts-in-contiguous-ownership each.". Lastly, the PP notes Table 9 in the GHG Plan transparently details the results from the SMZ adjustment in the three applicable cases.

9) Please refer to our above response to the sub-finding as a description of the SMZs are now delineated. We have attached supporting documentation in the form of 1) the shapefile of SMZs for the three streams in question, 2) the parcels associated with the project area, 3) a shapefile of aggregated parcels into parcels-in-contiguous-ownership, and 4) a revised baseline rx shapefile.

10) We note that the revised SMZs will nullify much of this finding. Please refer to our above response to the sub-finding as a description of the SMZs are now delineated. There should be no potential for bias (either conservative or non-conservative) as the delineation of SMZ now has no manual component in the procedure and is strictly based on a ruleset: choose the minimal buffer width such that no less than 10% of the tract or tracts-in-contiguous-ownership within the project area is designated SMZ. Note that the revised SMZs encompass plots 98, 100, 101 and 106 so the revised baselinerx plots shapefile correctly reflects this.

10 Additional) As described above the updated approach to determining SMZ buffers has resulted in the Plots 98, 100, 101 and 106 now being allocated to SMZs and thus the Let Grow scenario as the Project does not employ any harvesting in SMZ areas. Please see the table below for a description of the original baseline prescription (as shown in the previously submitted Baseline File Set) and the current prescription applied:

Plot	Original Baseline Rx	New Baseline Rx
98	Clearcut in Year 0 and Year 60	Let Grow
100	Clearcut in Year 10 and Year 70	Let Grow
101	Clearcut in Year 0 and Year 60	Let Grow
106	Clearcut in Year 0 and Year 60	Let Grow

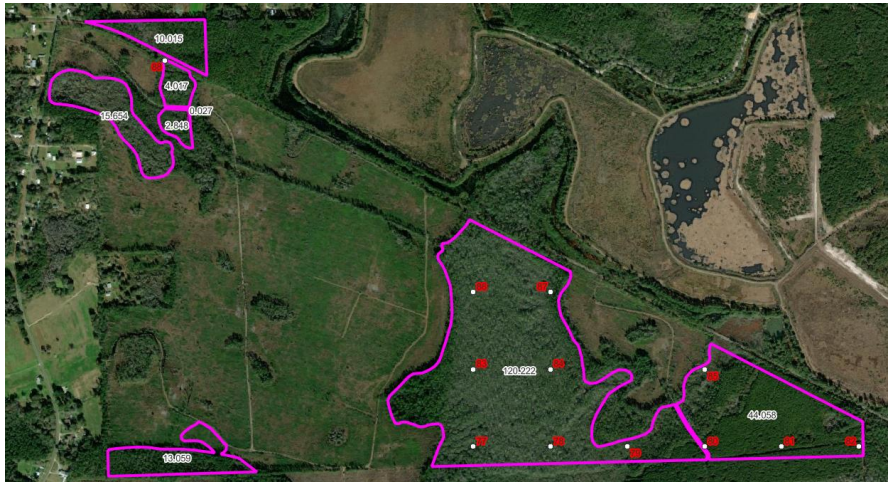
Additionally, the ERT calculations, GHG Plan, and MR have all been updated to reflect these changes.

NFLT_ProjectArea_ContiguousParcelGroups_20240425.shp
NFLT_VariableSMZ_20240425.shp
NFLT_ProjectArea_Parcels_20240425.shp
North Florida Land Trust IFM GHG PLAN_20240424.docx
ModelingUnits_20240424.xlsx
ACR722_NFLT-monitoring-report-template_20240426.docx
NFLT_ERT_Calculations_V3.2_20240426.xlsx
Baseline_20240426 Folder

07 May 2024	5a. Table 9 has been updated to show the correctly report that the Ortega River Preserve Adjusted Buffer Width, 80 ft.	*North Florida Land Trust IFM GHG PLAN_TrackedChanges_20240507.docx, North Florida Land Trust IFM GHG PLAN_ 20240507.docx*

Verifier Issue	**Issue ID:**	**23-23**	**Status:** Closed	**Checked by:** BS	**Date Identified** 23-Jan-24
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR IFM Methodology v1.3; B4	GHG Plan B5	Clarification. *May impact conformance; no materiality*	For clarity, in Section B5 of the GHG Plan, please include a list of the applicable laws and regulations that were incorporated into the baseline model (e.g., BMPs, ESA, Clean Water Act, etc.).		*North Florida Land Trust IFM GHG PLAN_20230727.docx*
			April 12, 2024 Findings Verifiers find that Section B5 of the GHG Plan now describes how Florida Best Management Practices and the Federal Endangered Species Act were considered in the baseline model. Both laws resulted in SMZs around streams and perennial water bodies. This issue item is closed.		*North Florida Land Trust IFM GHG PLAN_20240315.docx*
PP Response					
Date	***PP Comment***				***Additional evidence submitted for review by PP***
15-Mar-2024	The GHG Plan has been amended in Section B5 to succinctly list out applicable laws and regulations				*North Florida Land Trust IFM GHG PLAN_20240315.docx*

Verifier Issue	**Issue ID:**	**23-24**	**Status:** Closed	**Checked by:** SB	**Date Identified** 29-Jan-24
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR IFM Methodology v1.3; B4	GHG Plan C2	Clarification. *May impact conformance; no materiality*	Verifiers have reviewed the Common Practice calculation in NFLT Common Practice.xlsx and have the following questions/concerns. (1) Please update the "Project Start Date Data" and "Acres" tabs acres in this workbook to be consistent with the latest project acres and project stocks. Update the GHG Plan if necessary with the latest calculated values.		*NFLT_Common Practice.xlsx* *North Florida Land Trust IFM GHG PLAN_20230727.docx*

			(2) Please clarify the rationale for splitting the Triangle Preserve equally in half for the purpose of Assessment Area allocation when the areas separated from one another do not appear proportioned that way. Further, which plots were assessed for associated species when determining the Assessment Area. See screenshot below:  	
			April 9, 2024 Findings (1) Verifiers were not able to confirm the acres listed for each Management Area / Strata align with the latest project acreages (in Column EG) in the Project Start Date Data tab. Please update project acres and the updated weighted average value in the GHG Plan. (2) Verifiers understand the PP allocated all Triangle Preserve acres to Atlantic Coastal Plain Swamp Hardwood & Cypress rather than Atlantic Coastal Plain Loblolly-Shortleaf-Oak (with common practice values of 77.97 and 44.97, respectively). Having chosen the higher value, the baseline common practice value will be higher and thus more conservative. This issue item is closed.	*NFLT_Common Practice_20240315.xslx* *North Florida Land Trust IFM GHG PLAN_20240315.docx*
			April 19, 2024 Findings (1) Verifiers were able to confirm the acres listed for each Management Area / Strata now align with the latest project acreage. The weighted average value for above ground standing live trees was updated from 64.29 to 64.30 mTCO2e/ac which was also corrected in Section C2 of the GHG Plan. At project start the above ground standing live trees exceeded the common practice value of 49.4 mTCO2e/ac calculated from assessment area and associated species weighted by acreage. This issue is closed.	*NFLT_Common Practice_V2_20240416.xlsx* *North Florida Land Trust IFM GHG PLAN_20240416.docx*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	1: Acres have been updated in the Common Practice Workbook and all values within the GHG Plan and MR have been updated. 2: The common practice workbook now uses only the assessment area with the higher standing stocks. This was done as it has a more conservative implication for the common practice test. The GHG Plan has been updated with the results of the test.	*NFLT_Common Practice_20240315.xlsx* *North Florida Land Trust IFM GHG PLAN_20240315.docx*
16-April 2024	1: The Project has updated the Acres in the "Project Start Date Tab" of the Common Practice workbook and has a provided a new version of this workbook. As a result, the Standing Live Stock within Project at the start date changed from 64.29 to 64.30. The GHG Plan has also been updated to reflect this change.	*NFLT_Common Practice_V2_20240416.xlsx* *North Florida Land Trust IFM GHG PLAN_20240416.docx*

Verifier Issue	**Issue ID:**	**23-25**	**Status:**	**Closed**	**Checked by:**	**BS**	**Date Identified**	**26-Jan-24**

ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**	**Comments**
ACR IFM Methodology v1.3; C1	GHG Plan B5	Clarification. *May impact conformance; no materiality*	In section B5 (pg 20), the GHG Plan states: *"To ensure that harvest operations would be realistic and financially feasible, a minimum allowable harvesting operation of 600 cubic feet of merchantable material per acre was set for all harvesting prescriptions."* Please provide clarification on how the baseline harvest volume/ac threshold (600 ft3/ac of merchantable material) was determined and include a description in the GHG Plan.	*North Florida Land Trust IFM GHG PLAN_20230727.docx*
			April 9, 2024 Findings The PP have provided clarifications on the minimum harvest volume threshold (i.e.,520 cubic ft/acre of merchantable material) as well as the supporting documentation (attestation from a professional forester) to justify this assertion. As such, this issue is now closed.	*typical practice - minimum operational harvest levels.pdf*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
15-Mar-2024	This was a typo and baseline harvest constraint of 520 cubic ft/acre of merchantable material was used, the GHG has been amended to state this. Additionally, the project notes that this comes from an attestation of a professional forester, who identified 510 cubic ft/acre as the minimum; however, the since the statement was "approximately", the project considered a higher minimum of 520 cubic ft/acre of merchantable material.	typical practice - minimum operational harvest levels.pdf

Verifier Issue	**Issue ID:**	**23-26**	**Status:**	**Closed**	**Checked by:**	**SB**	**Date Identified**	**3-Apr-24**

ACR Standard ref	GHG Plan Section	Significance	Issue Description	Comments
ACR IFM Methodology v1.3; C1	GHG Plan C1	Clarification. *May impact materiality or conformance.*	Verifiers noted the NFLT_NPV_Analysis_V2_20240315.xlsx - Annual Costs_Revenues requires acreage updates.	NFLT_NPV_Analysis_V2_20240315.xlsx
			April 19, 2024 Findings Verifiers noted the acres in the NFLT_NPV_Analysis_V2_20240416.xlsx - Annual Costs Revenues tab have been updated as requested. This update resulted in no change to the Cost Per Acre, or Hunting Leases Revenue per Acres. This issue is closed.	NFLT_NPV_Analysis_V3.1_20240416.xlsx

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
16-April-2024	The Project has updated the acreages in the Annual Costs_Revenues tab. This change did not cause the average weight costs or revenues to change and therefore had no downstream implications.	*NFLT_NPV_Analysis_V3.1_20240416.xlsx*

Verifier Issue	**Issue ID:**	**23-27**	**Status:**	**Closed**	**Checked by:**	**SB**	**Date Identified**	**19-Apr-24**

ACR Standard ref	GHG Plan Section	Significance	Issue Description	Comments
ACR IFM Methodology v1.3; C1	GHG Plan C1	Clarification. *May impact materiality or conformance.*	Section B5 of the GHG Plan considers threatened and endangered species and their impacts on Baseline silviculture. Regarding the imperiled species recognized by the state of Florida, the PP indicates " *…none of the ten aquatic imperiled species are known to exist in the waters adjacent to the project area.*" Please describe in the GHG Plan the data sources assessed in making this determination. Verifier data checks noted Black Creek Crayfish as a potential documented imperiled species in waters adjacent to the project according to the Florida Natural Areas Inventory Biodiversity Matrix. Similarly, the PP states "*There are no Federally designated Rare, Threatened, or Endangered species that impact harvest management in the project area*." Please include in the GHG Plan which data sources were considered in making this determination. Verifiers noted the waterways adjacent to Black Creek Preserve and Sixmile Creek Preserve are shown as Critical Habitat for West Indian Manatee according to ECOS (link at right).	*North Florida Land Trust IFM GHG PLAN_20240416.docx* *Florida Biodiversity Matrix (fnai.org)* *https://ecos.fws.gov/ecp/report/table/critical-habitat.html*
			April 26, 2024 Findings Verifiers appreciate the update to Section B5 Threatened and Endangered Species of the GHG Plan. This section now references data sources reviewed in the PP's examination of T&E Species including project area FMPs, the Florida Natural Areas Inventory (FNAI) survey reports and the USFWS ECOS T&E Species Critical Habitat Report.	*North Florida Land Trust IFM GHG PLAN_20240424.docx* *LittleRainLake_Management Plan_2019.pdf* *FL Wildlife BMPs*

			Verifiers confirmed the PP's assessment of the FNAI fauna with documented occurrences of Black Creek Crawfish and the Southeastern American Kestrel (historic) which are both cited as State Imperiled Species in the FL Forestry Wildlife BMPs. For aquatic species including the black creek crayfish, verifiers note the Wildlife BMPs indicate "*the existing Silviculture BMPs for water quality are adequate for these species*". As such the baseline implications described in the previous subsection of the GHG Plan Section B5- "Florida Best Management Practices" are sufficient in addressing the presence of this species. The Wildlife Forestry BMPs indicate "*for southeast American kestrels, leave standing snags where they do not pose a safety issue*". The PP indicates the baseline scenario holds dead trees constant which addresses the presence of this species. Gopher Tortoises while mentioned in the Little Rain Lake Preserve FMP, does not require any specific baseline silviculture considerations. Verifier review of USFWS ECOS Critical Habitat GIS layer also showed West Indian Manatee in waters adjacent to the project area. Given this finding, verifiers confirmed with Florida Fish and Wildlife Conservation Commission Manatee Management Program Coordinator Michelle Pasawicz that no best management practices for upland forestry projects existed specific to manatee. This is consistent with the description provided by the PP. This issue is closed.	*FL BMPs*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
26-April-2024	The Proponent has taken a more systematic approach to identification of TES within and adjacent to the project area. The Proponent sources both FNAI and for the manatee, ECOS. Data sources and the process used to identify potential TES is now documented in the GHG Plan. Each species was individually reviewed for implications for the baseline with clear documentation. Please refer to the GHG Plan to review the changes.	*North Florida Land Trust IFM GHG PLAN_20240424.docx*

Verifier Issue	**Issue ID:**	**23-28**	**Status:** **Closed**	**Checked by:** **SB**	**Date Identified** **3-May-24**
ACR Standard ref	**GHG Plan Section**	**Significance**	**Issue Description**		**Comments**
ACR IFM Methodology v1.3;	ERT Calcs	Clarification. *May impact materiality or conformance.*	Verifiers understand the ACR ERT Calc tab includes values that represent annual carbon stocks derived from FVS modelling and are not consistent with the reporting periods. Verifiers note the reporting period spans 705 days from 1/27/2020-12/31/2021. To determine the total ERTs for all vintages the PP has prorated the values to backdate the FVS 1/27/2022 values to the EORP (12/31/2021). Verifiers noted this was done inconsistently as ERTs and Project/Baseline stocks were adjusted based on 339 days while Leakage, Buffer, and Removals were adjusted by 338 days (see row 57 in the ERT workbook). Please update to consistency adjust the calculated values by 339 days. Please update all documents to present the correct values.		*NFLT_ERT_Calculations_V3.2_20240426.xlsx – ACR ERT Calc, Monitoring Report Tables RP1*

			May 7, 2024 Findings Verifiers find the revised ERT calculations workbook now consistently applies a 339 day adjustment to the ERT values provided in row 57 of the ACR ERT Calc tab. Leakage, Buffer and Removals calculation method for the reporting period values now aligns with the method used for Project/Baseline stocks. Verifiers acknowledge the MR has also updated to reflect these changes. This issue is closed.	*NFLT_ERT_Calculations_V3.2_20240507.xlsx* *ACR722_NFLT-monitoring-report-template_20240507.docx*

PP Response		
Date	***PP Comment***	***Additional evidence submitted for review by PP***
07-May 2024	The Project agrees with the VVB and has updated the updated the NFLT_ERT_Calculations_V3.2_20240507.xlsx to now consistently apply 339 across the calculations of ERTs, Leakage, Buffer, and Removals for the reporting period. The PP has updated the MR to reflect these changes.	*NFLT_ERT_Calculations_V3.2_20240507.xlsx, ACR722_NFLT-monitoring-report-template_20240507.docx*

Appendix C: Project Team

Verification Team	Qualifications
Bill Stack	Bill Stack is a forester, natural resource manager, and ecosystem restoration specialist with 35 years' experience working on forest and aquatic ecosystems in the northeast and northwest US. He holds a master's degree in Forest Engineering from Oregon State University. He is an ARB accredited lead verifier and forest project specialist. Bill has participated on the verification of forest offset projects throughout the US including Alaska. Verification responsibilities included pre-site visit prep, forest inventory, data processing and analysis, developing findings, and report writing. Bill also provides a broad range of forest management consultation services to private landowners owners in preparing and implementing ecologically-based forest stewardship plans. He holds professional forester licenses in New Hampshire and Vermont. Previously, Bill has worked as a Senior Project Scientist with Stantec consulting on ecosystem restoration projects and as a Forest Hydrologist on interdisciplinary project teams for the USDA Forest Service, Wallowa-Whitman National Forest.
Alexa Kandaris	Alexa Kandaris has been with S&A since 2016 and brings experience in carbon auditing and climate change mitigation policy. She is accredited by ARB as a lead verifier under their US Forests protocol and the Ozone Depleting Substances protocol, and by the Climate Action Reserve (CAR) as a lead verifier. Alexa has participated in verifications of carbon offset projects and corporate inventories under a variety of GHG programs, including the Air Resources Board, Climate Action Reserve, American Carbon Registry, Verified Carbon Standard/Climate Community & Biodiversity Standard/Sustainable Development Verified Impact Standard, and Carbon Disclosure Project. In addition to validation/verification, she developed tracking systems for a program registered under the Clean Development Mechanism and registered with the Gold Standard. Alexa is currently responsible for implementation of S&A's corporate management system to ensure ongoing improvement and compliance with ISO requirements. Alexa has field experience with Forestry (AFOLU), Ozone Depleting Substances, and Livestock project types. She holds a Bachelor of Arts in Economics with a focus on natural resource and environmental Economics.
Elizabeth McGarrigle	Elizabeth McGarrigle holds three forestry degrees (BScF, MScF, PhD). Her work has focused on forest inventory, growth and yield, and forest management planning. Her research focused on examining the impact of uncertainties in the inputs to long term forest management plans when optimization models are employed during the Master's program. While completing her PhD, she was part of the team developing a regional growth and yield model for the Acadian forest in the Northeastern United

Verification Team	Qualifications
	States and Canada. She developed a stand level model that is used to predict survivor growth, ingrowth, and mortality in the region. As part of her dissertation, she focused on several variants of the Forest Vegetation Simulator and several regional growth and yield models from across Canada and the United States. Dr. McGarrigle is currently working with the provincial government in Nova Scotia Canada as a Forest Inventory Data Analyst where she is responsible for the design and analyses of permanent sample plots. In addition to her work as a biometrician on several ARB forest projects, she has also been involved in research at Natural Resources Canada using a fine scale forestry model to assess the impact of climate change on species composition in forest types across Canada.
Marty Duffany	Martin Duffany holds a BS in Forestry from SUNY College of Environmental Science and Forestry. He brings over 35 years of experience in forest management working for forest industry and Timberland Investment Organizations (TIMOs) primarily in the northeastern and Appalachian regions of the US and eastern Canada. This experience focuses mainly on managing all aspects of forest inventory and mapping projects but includes extensive work in forest management planning, modeling and analysis. He has years of experience working in compliance with FSC and SFI certification standards and protocols. Martin joined S&A Carbon in February 2019 as a contractor providing support on desk and field verification projects. He is an SAF Certified Forester and holds forester licenses in Maine, New Hampshire and Vermont.
Stacy Birch	Stacy Birch holds a B.S. in Ecology from Susquehanna University in Pennsylvania and a M.S. in Forest Resources from the University of Maine, Orono. Her master's thesis entitled "Stand dynamics and the Spatio-temporal patterns of natural disturbances in an Acadian Old-Growth Reserve" focused on dendroecological and geographic information systems processing. Stacy joins S&A with over a decade of experience in data manipulation and analytics on various platforms giving her diverse expertise using multiple coding languages including SQL, R, Visual Basic, and Python. Her primary responsibilities include maintaining S&A's carbon calculation tool; verifying forest inventory carbon calculations and statistics; and completing GIS analyses and aerial imagery assessments. Stacy also provides supporting data checks on harvested wood products, legal regulatory compliance, baseline constraint acres, and forest growth and yield modeling components. She has supported numerous American Carbon Registry and California Air Resources Board Improved Forest Management carbon offset validation/verification projects as a Technical Expert.

Verification Team	Qualifications
Kyle Silon	Kyle Silon holds an M.S. in Energy and Environmental Economics. He has ten years' experience in climate change mitigation strategies and carbon reduction projects. Prior to founding S&A, he worked for a leading international certification company, specializing in validation and verification of small-scale household energy demand projects (such as cook stove and water filter projects), primarily located in South America, Asia, and Africa. He has participated in numerous verifications of forestry, landfill, and livestock projects, and has worked across all major GHG programs, including the Air Resources Board, Verified Carbon Standard, Climate Action Reserve, American Carbon Registry, Gold Standard, and Clean Development Mechanism (CDM).
Pete Clark	Pete Clark holds a PhD in forestry and natural resources from the University of Vermont. His research focuses on forest management strategies for climate change adaptation and carbon mitigation. Although his research has primarily focused on the northeastern US, he has worked in many forest types throughout North America. Prior work entailed long term dendro-ecological and climatological reconstructions of various forest types across North America, developing high angle biological monitoring tools for state and federal natural resource agencies, and college faculty in forest ecology. He has field experience throughout New England, the Mid-Atlantic and the Pacific Northwest but is fond of his time spent in all forest. Pete has been with S&A Carbon since 2019.
David McMath	David McMath holds a BS in Biology with a concentration in Computer Science and a MS in Forestry. He has over 23 years providing natural resource management services for a diversity of Clients throughout New England. Clients include; investors, corporate entities, non-profit groups, individuals, family trusts, town and state. Responsibilities; GIS mapping (ArcGIS), forest management, timber harvesting, marketing, budgeting, green certification (FSC), inventory, wildlife management, recreation management, carbon offset verification, invasive control, timber valuation and due diligence. He is a member of SAF & Forest Stewards Guild and a Licensed Forester in the State of Vermont.

Appendix D: Version Tracking

Version	Date	Developed By	Version Notes
1.0	5/17/2024	Bill Stack	Initial Document
1.1	5/22/2024	Alexa Kandaris	Technical Review
1.2	5/23/2024	Bill Stack	Revised based on Technical Review comments
1.3	5/30/2024	Bill Stack	Updated verification activity dates
1.4	7/23/2024	Bill Stack	Updated based on ACR Review comments
1.5	8/22/2024	Bill Stack	Updated based on ACR Review comments
1.6	8/26/2024	Bill Stack	Updated based on ACR Review comments
1.7	9/24/2024	Bill Stack	Updated based on ACR Review comments
2.0	10/28/2024	Bill Stack/Alexa Kandaris	Finalized for ACR approval
2.1	11/4/2024	Bill Stack/Alexa Kandaris	Finalized for ACR approval (validated MR signature)

Signature Page

S&A Carbon Lead Validator/Verifier Name and Signature:	Bill Stack 
S&A Carbon Technical Reviewer Name and Signature:	Alexa Kandaris 
Date:	11/4/2024