

APPLICATION FOR LISTING AN IMPROVED FOREST MANAGEMENT U.S. FOREST OFFSET PROJECT

OPR Staff Use Only	Date Application Received:	OPR Tracking Number:	Date Application Reviewed:	OPR Staff Use Only
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PART I. ENTITY APPLYING FOR LISTING

Is this form being submitted by the Offset Project Operator (OPO) or by the Authorized Project Designee (APD)? Notes: 1. The person completing this form should be an OPO/APD employee. 2. If the APD is submitting this form, the OPO should submit the form <i>Designation of Authorized Project Designee</i> simultaneously.	<input checked="" type="checkbox"/> OPO <input type="checkbox"/> APD
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Name of Person Completing Form: Zach Spector	Organization, if applicable: Western Rivers Conservancy		
Date Form Completed: 9/29/2015	Phone Number: (503)241-0151	Email Address: zspector@westernrivers.org	

PART II. OFFSET PROJECT INFORMATION

Offset Project Name: Blue Creek		
Offset Project Commencement Date: 3/19/2015	First Reporting Period Start Date: 3/19/2015	First Reporting Period End Date: 7/1/2016

Provide an explanation and justification for the commencement date. Specify the action(s) that identify the offset project commencement date.
 March 19, 2015 was selected as the Offset Project Commencement Date because this is the date when Western Rivers Forestry acquired the full Project Area.

Green Diamond Resource Company granted Western Rivers Forestry ownership of 8,496.3 acres on November 19, 2013 (Phase A). Western Rivers Conservancy recorded a Grant Agreement with the California Wildlife Conservation Board on March 16, 2015. A copy of that Grant Agreement has been included as Attachment K. Funds secured through the Grant Agreement were used by Western Rivers Conservancy to close on the remaining 6,489.0 acres of Project Area (Phase B). On March 19, 2015 Western Rivers Conservancy conveyed this property to Western Rivers Forestry. A map of the acquisition phases has been included as Attachment A1.

PART III. OPO/APD INFORMATION

A. OPO			
OPO Name: Western Rivers Forestry		OPO's CITSS ID#: CA 1947	
Mailing Address: 71 Oak Street, Suite 100	City: Portland	State: OR	Zip: 97204
Contact Person: Sue Doroff	Phone Number: (503)241-0151	Email Address: sdoroff@westernrivers.org	
B. APD (if applicable)		<input checked="" type="checkbox"/> No APD/Not Applicable	
APD Name: N/A		APD's CITSS ID#: CA _ _ _ _	
Mailing Address:	City:	State:	Zip:

Contact Person:	Phone Number:	Email Address:
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PART IV. LAND OWNERSHIP

A. Is the Offset Project Operator (OPO) the owner in fee for the Project Area? <i>Further documentation is required for all projects. Submit as attachment labeled "Attachment A." See Part X of this listing document for more information.</i> If "no," explain how the entity identified as the OPO has the right to undertake and list the project.	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No
B. List all Forest Owners. This includes owners in fee as well as third parties with existing property interests within the Project Area that affect the trees and standing timber located in the Project Area (e.g. mineral rights, timber rights, easements, rights of way, leases, etc.). Western Rivers Forestry owns the Project Area in fee simple and holds all property interests within the Project Area that affect the trees and standing timber located within the Project Area. There is a recorded Offer to Dedicate in favor of California State Coastal Conservancy.	
C. Does the offset project occur on public or private lands? <i>If the project occurs on public lands, proceed to questions C1 and C2. Otherwise, skip to question D. Further documentation is required if project occurs on public lands. Submit as attachment labeled "Attachment B." See Part X of this listing document for more information.</i>	<input checked="checked" type="checkbox"/> Private <input type="checkbox"/> Public
1. Describe the public process that has been used to approve forest management activities and baseline. N/A	
2. Describe the documentation being submitted with this listing document demonstrating approval of planned forest management activities and baseline. N/A	
D. Will the project employ a Qualified Conservation Easement (QCE)? <i>If employing a QCE, proceed to questions D1, D2, and D3. Otherwise, skip to question E. Supporting documentation for a QCE is required. Submit as attachment labeled "Attachment C." See Part X of this listing document for more information.</i>	<input type="checkbox"/> QCE <input type="checkbox"/> Public Ownership
1. Date that the QCE was or will be recorded. N/A	
2. Will the project take place in a state that requires third-party beneficiaries to sign the easement (i.e., to "accept and record that acceptance"), such as Arizona, Pennsylvania, or West Virginia?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Provide the terms within the easement that affect forest management. N/A	
E. Does the offset project occur on any of the following categories of land? (check all that apply) <input type="checkbox"/> Land that is owned by, or subject to, an ownership of possessory interest of a Tribe <input type="checkbox"/> Land that is "Indian lands" of a Tribe as defined by 25 U.S.C. §81(a)(1) <input type="checkbox"/> Land that is owned by any person, entity, or Tribe, within the external borders of such Indian lands <input checked="checked" type="checkbox"/> None of the above <i>If "none of the above," skip to Part V. Otherwise, proceed to questions E1 and E2. Further documentation is required for projects occurring on land listed in the first three categories. Submit supporting documents as attachments labeled "Attachment D." See Part X of this listing document for more information.</i>	
1. Does a limited waiver of sovereign immunity between ARB and the governing body of the Tribe exist? N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Describe how the land within the Project Area is owned. Western Rivers Forestry owns the property in fee simple.	

PART V. OFFSET PROJECT AREA

Maps depicting specific elements of the Project Area are required for all projects. Submit supporting documentation as attachments labeled "Attachment E." See Part X of this listing document for more information.

Latitude of Offset Project Location: 41° 25'14.65" N	Longitude of Offset Project Location: 123° 52'24.62"	Project Area Total Acreage: 14,985.3
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- A. Identify the assessment area (or assessment areas, if project crosses more than one) that contain Project Area lands and list the acreage of project lands within each assessment area.**
8,290.6 acres in Northern California Coast Assessment Area, 6,704.7 acres in Southern Cascades Assessment Area
- B. Identify the governing jurisdiction(s) applicable to the Project Area.**
14,312.4 acres of the project area are in Humboldt County and 672.9 acres are in Del Norte County, the State of California, the United States of America.
- C. Describe how the Project Area was determined.**
The Project Area represents property acquired by Western Rivers Forestry from Green Diamond Resource Company and Western Rivers Conservancy. The Project Area was determined using GIS shapefiles supplied by Dan Opalach, Timberlands Investment Manager at Green Diamond Resource Company. The Project Area boundary is represented in maps included in Attachment E1 and the GIS shapefile included with this listing document.
- D. Describe the existing land cover, and land use of the Project Area.**
Land cover in the Project Area is representative of second growth Douglas fir and coastal redwood forests in northern California. Accordingly, the Project Area supports a healthy, diverse forest community composed of Douglas fir, redwood, tan oak, red alder, western red cedar, madrone, western hemlock, bigleaf maple, California laurel, ponderosa pine, sugar pine, golden chinquapin, Port Orford cedar, live oak, black oak, grand fir, and cottonwood. Species distribution varies with aspect and elevation transitioning from cottonwoods along Blue Creek and Bear Creek to bigleaf maple and red alder rich riparian areas to Douglas fir, redwood and tan oak on higher and drier sites.
- E. Describe the forest vegetation types within the Project Area boundary.**
The Project Area contains Douglas fir, coastal redwood, and other mixed conifer stands of various age and density classes. Hardwoods, predominantly tan oak, are also present across the Project Area.
- F. Describe the site classes within the Project Area boundary.**
The project is predominantly low site class, with approximately 77% of the project classified low site class (classes I – III) and approximately 23% of the project classified high site class (classes IV – VII). See Listing_Document_Map_E8 for a map of Project Area site classes.
- G. Describe the land pressures and climate zone/classification applicable to the Project Area.**
The Project is located in a rural area adjacent to the Six Rivers National Forest and the Siskiyou Wilderness Area. Accordingly, there is limited road access and low development pressure. However, significant portions of the Project Area are adjacent to the Klamath River and Blue Creek – both of which have significant ecological (fish habitat and migration) and recreational (boating, kayaking and fishing) value.
- The Project Area is spread across three climate zones: 8a (10-15°F), 8b (15-20°F), and 9a (20-25°F) with annual average precipitation between 85-115 inches.
- H. Describe the historical land uses, current zoning, and projected land use within the Project Area and surrounding areas.**
The Klamath River was once one of the most productive rivers in the West and copious amounts of salmon, steelhead and rainbow trout supported Native Americans as long as 7,000 years ago. This began to change as Euro-American fur-trappers traveled from Fort Vancouver to the Klamath region during the late 1820s. In the 1850s significant deposits of gold were discovered in the region, and to some extent gold prospecting continues today despite the region being mined long after the end of the gold rush.

Following the gold rush, logging became the dominant industry. During the early 20th century several mills were built, and much of the Klamath River watershed was harvested. Due to the high productivity of the region's forests, timber has remained a significant component of the local economy and the region is home to multiple large private timberland owners and several sawmills and biomass facilities. Timber management is expected to remain the primary land use on the majority of the local private forestlands in the region.

Prior to acquisition by Western Rivers Forestry, Green Diamond Resource Company managed the Project Area for timber production. Accordingly, the Project Area is zoned Timber Production Zone (TPZ). The TPZ ordinance is an agricultural designation allowing for continued timber production.

Today the Klamath River is a federally protected Wild and Scenic River and this project will contribute to the overall ecological health and productivity of this region.

I. Describe generally the forest conditions within the Project Area, including species composition, age class distribution, and management history.

Maximum Species Diversity Index (SDI) for Northern California Coast Assessment Area is 60% and Maximum SDI for Southern Cascades Assessment Area is 65%.

Based on a 2013 carbon inventory, three species make up 80% of the basal area within the Project Area. Douglas fir is the most dominate species and represents 32.3% of the basal area within the project area; redwood is the second most dominant species with 25.7% of the basal area within the project area, and tan oak is the third most dominant species with 22.9% of the basal area within the project area.

The remaining significant species are Red Alder (5.7% of BA), Western Red Cedar (2.8% of BA), Pacific Madrone (2.78% of BA), Western Hemlock (2.68% of BA), Bigleaf Maple (2.64% of BA), and California Laurel (1.03% of BA). After that, the Project Area is comprised of Ponderosa Pine (0.56% of BA), Sugar Pine (0.37% of BA), Golden Chinquapin (0.21% of BA), Port Orford Cedar (0.18% of BA), Live Oak (0.14% of BA), Black Oak (0.09% of BA), Grand Fir (0.05% of BA), and Cottonwood (0.02% of BA).

The Project Area has an average basal area of 191 ft² per acre.

Of the total basal area, only 5.48% is 20 years or younger. 83.7% is 21 years or older, and 10.7% of the total calculated basal area does not currently have an associated age.

The property has been managed for timber harvest since approximately 1910.

PART VI. OFFSET PROJECT ELIGIBILITY

A. Does the project take place on land that has greater than 10 percent tree canopy cover? <i>Supporting documentation is required. Submit as attachment labeled "Attachment F." See Part X of this listing document for more information.</i>	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No
B. Indicate how the offset project meets (or will meet) the definition of Natural Forest Management per Table 3.2 in the Compliance Offset Protocol US Forest Offset Projects, November 14, 2014:	
1. Native species: a) Will the project consist of at least 95% native species based on the estimated sum of carbon in the standing live carbon pool? <i>If "no," proceed to question 1b. Otherwise, skip to question B2.</i>	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No
b) Describe how the project will meet this requirement. (Improved Forest Management Projects will be assessed using estimates of basal area per acre.) N/A	

2. Composition of native species: a) Does the Project Area naturally consist of a mixed species distribution where no single species' prevalence, measured as the percent of basal area of all live trees in the Project Area, exceeds the percentage value of standing live carbon shown under the heading 'Species Diversity Index' in the Assessment Area Data File? <i>If "no," proceed to questions 2b and 2c. Otherwise skip to question B3.</i>	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No
b) Explain how the project will demonstrate a trend toward achieving the Species Diversity Index of native species and meet this requirement within 25 years. N/A	
c) If the Project Area does not naturally consist of a mixed species distribution: Will or have you provided a written statement from the government agency in charge of forestry regulation in the state where the project is located stipulating that the Project site is not capable of meeting the requirement of mixed species distribution.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Distribution of age classes/sustainable management: a) Indicate how the project will meet the requirement for sustainable management if commercial harvesting is either planned or ongoing within the Project Area demonstrating sustainable long term harvesting practices. This applies to all forest landholdings of the Forest Owner(s) (check one of the boxes). <input type="checkbox"/> Not applicable; no commercial harvesting is occurring within the Project Area. <input type="checkbox"/> Third party certification under the Forest Stewardship Council, Sustainable Forestry Initiative, or Tree Farm System, whose certification standards require adherence to and verification of harvest levels which can be permanently sustained over time. <input checked="checked" type="checkbox"/> Adherence to a renewable long-term management plan that demonstrates harvest levels which can be permanently sustained over time and that is sanctioned and monitored by a state or federal agency. <input type="checkbox"/> Employ uneven-aged silvicultural practices and maintain canopy retention averaging at least 40% across the forest, as measured on any 20 acres within the entire forestland owned by the Forest Owner, including land within and outside of the Project Area (areas impacted by Significant Disturbance may be excluded from this test).	
b) On a watershed scale up to 10,000 acres (or the Project Area, whichever is smaller), projects must maintain, or make progress toward maintaining, a maximum of 40% of the project's forest lands in ages that are less than 20 years old. (Areas impacted by Significant Disturbance are exempt from this test until 20 years after reforestation of such areas.) Does the acreage within this project meet this requirement? <i>If "no," proceed to question 3c. Otherwise, skip to question B4.</i>	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No
c) Explain how the project intends to show continuous progress toward meeting this requirement within the next 25 years. N/A	
4. Structural elements (standing and lying dead wood): How will the project ensure that structural elements are retained in sufficient quantities throughout the project life? <p>Western Rivers Forestry has no intention to actively remove lying dead wood as part of anticipated management activities. It is expected that the accumulation of lying dead wood will be commensurate with the recruitment from standing dead trees. Western Rivers Forestry intends to manage the property for ecological purposes – primarily to promote old-growth-like structure, to improve water quality, and to improve and maintain critical wildlife habitat. These management objectives should ensure that standing and lying dead wood remain in sufficient quantities.</p> <p>At a minimum WRF, is committed to maintaining current levels of standing dead trees, and in all likelihood the number and distribution of snags within the project area will increase over time. If it is determined that the volume of standing dead is below structural element requirements, WRF will make the recruitment of this structural element a component of the overall timber management activities.</p>	
C. Describe the management activities that will lead to increased carbon stocks in the Project Area, compared to the baseline. <p>Western Rivers Forestry acquired the Project Area from Green Diamond Resource Company. Under Green Diamond Resource Company ownership, the Project Area was managed for commercial timber production. Even-aged management is common on commercial timberland in Northern California, and common silvicultural treatments include clearcuts, shelterwood preparation, and variable retention. This is demonstrated in Listing Document Attachment J, which</p>	

shows proposed harvest activities for 2015 Timber Harvest Plans in the vicinity of the Project Area.

The stocking level (average basal area of 191 ft² per acre) and species composition (32.3% Douglas fir, 25.7% redwood) demonstrate that if Western Rivers Forestry were to continue to manage the Project Area for commercial timber production (the baseline scenario), much of the Project Area would be considered ready for harvest. However, under the project scenario, Western Rivers Forestry intends to manage the Project Area to promote other values, primarily watershed and forest health, sustained yield, and maximum community benefit. How this will be achieved will be described in the Forest Management Plan that Western Rivers Forestry is developing with input from California Department of Fish and Wildlife, and which will be approved and monitored by the Wildlife Conservation Board. A key component of this plan will be to replace even-aged management with selection and group selection harvests, thus promoting greater age-class diversity and higher stocking levels within all stands throughout the Project Area.

While the specifics of the Forest Management Plan are still being developed, in general the Project Area is divided into two management blocks. While Western Rivers Forestry is the landowner, on the ground management activities will be implemented by foresters and forestry technicians from the Yurok Tribe.

The southern portion of the property closer to Bear Creek will be managed to provide for multiple uses including watershed and forest health, sustained yield, and maximum benefit. While some harvesting will occur in this area, it will be significantly below annual growth and will mostly follow selection and group selection techniques to improve forest health.

The portion of the Project Area to the North encompassing the mouth of Blue Creek will see very little harvest activity because the primary objective on this portion of the property is to improve water quality and further protect Blue Creek.

Timber harvests that occur within the Project Area will never exceed sustained yield levels. Future THPs will primarily employ single tree selection and, to a lesser extent, group selection techniques to promote multiple age classes and species diversity. Furthermore, there is a strong desire to limit clearcutting except in rare cases. Where appropriate (i.e. meadow restoration), clearcuts should be less than 20 acres in size.

Because the overall management objective is to provide for multiple benefits (water quality, wildlife habitat, aesthetics, soil, etc.) and to promote long-term sustainable forestry, carbon stocks in the project area will continue to increase for the foreseeable future.

D. Is this project being implemented and conducted as the result of any law, statute, regulation, court order, or other legally binding mandate? If "yes," explain: N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
E. Will the offset project employ broadcast fertilization?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
F. Does the offset project take place on land that was part of a previously listed and verified Forest Offset Project? If "yes," proceed to questions E1 and E2. Otherwise, skip to Part VII.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
1. Was the previous Forest Offset Project terminated due to an Unintentional Reversal?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. Is the project transitioning to the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014, after previously being listed as an early action offset project?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART VII. CARBON STOCK INVENTORY

A. Provide a general description of the inventory methodology to be used to quantify carbon stocks for each required carbon pool in the forest project's offset boundary. The inventory methodology must describe the information required in Appendix A.3 of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014.

IFM-1 Standing Live:

A carbon inventory was completed in 2013 with 154 plots in the Project Area. The inventory sampling design was a stratified random sample, with plots comprising the sampling units.

At each plot location, three nested plots were measured: an outer nest with radius 37 feet from plot center, a middle nest with radius of 17 feet, and an inner nest with radius of 12 feet. The outer nests include the area in the inner nests as well. Within the 37 foot radius plot, all trees with a DBH \geq 12 inches were measured. Within the middle nest, all trees with a DBH \geq 5 inches were measured. Within the inner nest, all trees with DBH $<$ 5 inches were tallied.

For measured trees, detailed measurements were collected, including at a minimum: species, diameter, height, and missing biomass. Additional measurements varied depending on whether the tree is of commercial species or of merchantable size.

Diameter at breast height was measured using a DBH tape, to the nearest tenth of an inch. Height measurements were made to the nearest foot using an optical or ultrasonic hypsometer or rangefinder. Plot measurements were made with either a 100 foot tape or a hypsometer or rangefinder. Missing biomass was visually estimated to the nearest 10% for the whole tree.

Western Rivers Forestry will maintain a current running inventory of carbon stocks as part of their management of the project site. Plots will be re-measured at least every twelve years. Individual trees on measure plots may be grown using FVS or any other growth model approved by ARB between re-measurements, provided that it has been calibrated to accurately reflect data in earlier modeling exercises. Additional plots may be added to the inventory to improve the precision of estimates.

IFM-3 Standing Dead:

Standing dead was also measured alongside standing live in the carbon inventory described above. Standing dead trees in the outer nested plot with height \geq 15 feet and DBH \geq 12 inches and standing dead trees in the middle nested plot with height \geq 15 feet and DBH \geq 5 inches were measured, with measurements including species, height, diameter, decay class, and missing biomass.

IFM-6 Soil (if applicable):

N/A

IFM-7 Carbon in in-use forest products:

Mill receipts for harvested wood products are recorded and retained by the OPO.

IFM-8 Forest product carbon in landfills (if applicable):

Mill receipts for harvested wood products are recorded and retained by the OPO.

IFM- 9 Biological emissions from site preparation:

N/A

IFM-14 Biological emissions/removals from change in harvesting on forestland outside project area:

Default 20% secondary effects factor applied to difference between actual and baseline harvest volumes.

IFM-17 Biological emissions from decomposition of forest products:

Mill receipts for harvested wood products are recorded and retained by the OPO.

B. Describe the calculation methodologies to be used to determine metric tons per acre for each of the carbon pools included in the Offset Project Data Report.

IFM-1 Standing Live:

If necessary, plot measurements are grown forward to the current reporting year using an approved growth and yield model. On individual plots, carbon in the standing live pool is calculated using ARB-approved volume and biomass equations for California. Below ground biomass is calculated using the model from Cairns, et al 1997. Biomass (kg/ac) is converted to carbon by multiplying by 0.5, 0.001, and 3.664. Mean carbon in (tCO₂e/ac) for the entire sampling frame is estimated across forest stratum using stratum area weights.

IFM-3 Standing Dead:

Biomass and carbon in standing dead trees was calculated using the same steps as outlined above. Density reduction factors from Harmon et al. (2011) were applied by decay classes.

IFM-6 Soil (if applicable):

N/A

IFM-7 Carbon in in-use forest products:

Measured through harvest receipts, and calculated using ARB regional mill efficiency rates, decay rate, and landfill values.

IFM-8 Forest product carbon in landfills (if applicable):

Measured through harvest receipts, and calculated using ARB regional mill efficiency rates, decay rate, and landfill values.

IFM- 9 Biological emissions from site preparation:

N/A

IFM-14 Biological emissions/removals from change in harvesting on forestland outside project area:

Default 20% secondary effects factor applied to difference between actual and baseline harvest volumes.

IFM-17 Biological emissions from decomposition of forest products:

Calculated based on harvest wood volumes and mill efficiencies.

C. Provide a summary of the inventory of carbon stocks for each carbon pool (or approach used, if inventory is not applicable).

IFM-1 Standing Live:

223.21 tCO₂e/ac

IFM-3 Standing Dead:

6.33 tCO₂e/ac

IFM-6 Soil (if applicable):

N/A

IFM-7 Carbon in in-use forest products:

0 tCO₂e. No harvesting has occurred in the Project Area.

IFM-8 Forest product carbon in landfills (if applicable):

0 tCO₂e. No harvesting has occurred in the Project Area.

IFM- 9 Biological emissions from site preparation:
N/A

IFM-14 Biological emissions/removals from change in harvesting on forestland outside project area:
5,277 tCO₂e

IFM-17 Biological emissions from decomposition of forest products:
0 tCO₂e. No harvesting has occurred in the Project Area.

D. Provide a summary of the estimated inventory confidence statistics.

The estimated sampling error is 11.74% of the inventory estimate. The sampling error was estimated by first computing the standard error of estimated mean carbon, then multiplying the standard error by the z-value of 1.645 to reach a value for a 90 percent confidence interval, then dividing by estimated mean carbon, then multiplying by 100 to render a percent.

Western Rivers Forestry intends to reduce the sampling error to less than 5% and additional inventory work is planned to meet this objective.

E. Provide the calculation of the offset project's reversal risk rating and expected contribution to the Forest Buffer Account.

This project does not employ a Qualified Conservation Easement so the following percentages were used to determine the estimated contribution to the buffer account:

Financial risk – 5%
Conversion risk – 2%
Overharvesting risk – 2%
Social risk – 2%
Natural disturbance risk I – 4%
Natural disturbance risk II – 3%
Natural disturbance risk III – 3%

$$100\% - ((1.0 - 0.05) * (1.0 - 0.02) * (1.0 - 0.02) * (1.0 - 0.02) * (1.0 - 0.04) * (1.0 - 0.03) * (1.0 - 0.03))$$

19.2% expected contribution to the buffer pool.

PART VIII. OFFSET PROJECT BASELINE

A. Required for ALL Improved Forest Management Projects

1. Describe the project's modeling plan, following the requirements and methods in Appendix B, Section B.3 of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014.

The model was parameterized with silvicultural prescriptions and local calibration. It was parameterized to consider the required legal constraints of the California Forest Practice Rules (FPRs) in the baseline scenario and in the project scenarios. The model was calibrated using inventory taper data obtained from the inventory. These data served to calibrate the volume equations used to estimate yield.

Merchantability was specified for all merchantable species as a minimum diameter of 6 inches and minimum log length of 16 feet. In reality, merchantability specifications would change over time as milling systems and markets evolve. The model does not assume how merchantability specifications would change over the modeling period and thus these specifications were fixed

throughout the modeling period.

The Northern California Region 16 library was selected based on recommendation from FBRI. The project resides in this region generally defined by FBRI.

The natural regeneration model in FPS follows a 1/100th acre grid across the simulation area. This simulation area is typically 0.25 acres but can go as high as 2.5 acres for each stand. A list of species was generated by tolerance in the HABSPP table, assembled using the habitat classification routine and the species on the ownership. In version 7 of the FPS software, this also includes non-tree vegetation habitat classes. At every trigger point (1 growth step or 20' of height growth) all of the 1/100th acre grids are evaluated. Since the model created a stem map internally it knows the level of competition at every point. Given the level of competition at each point, the regeneration model introduces species by tolerance as listed in the habitat classification. Sometimes the answer is no vegetation of any kind can be put in the space. Once the tree is there the small tree model takes over and the survival is dependent on the small tree silviculture defined in the stand regimes. The small tree model is calibrated to FBRI field data and uses two parameters from the SILVICS table, PctHt and PctSur, which were left as FPS defaults for the even and uneven-aged regimes.

The model assumes that natural regeneration is a function of species tolerance relative to levels of density-dependent competition. The model also assumes that early height growth and survival are near the defaults values provided by FPS.

All harvest and planting prescriptions allow for the removal of all trees according to the legal constraints described in this report, which may include all trees at final rotation. The following prescriptions were used in the modeling process:

NONE - Not modeled, assumes no carbon stocks (only road features).

GROW - No management. Assumes natural regeneration as predicted by the approved-FPS growth model.

SLRP - Selection cuts from 380 to 300 ft²/ac. Harvested with uniform selection over diameter classes and species. Harvest intervals vary by site class from 60 to 100+ years. Assumes natural regeneration. No species preferences were specified in the model and thus FPS selected trees randomly for harvest.

PLT1 - Planting Douglas fir at 300 trees/ac.

CLR1 - Clear cut for Site Class I: intermediate thinning to 125 ft²/ac, planting Douglas fir at 300 trees/ac. Thinned from below. Group A species favored including Douglas fir, ponderosa pine and white fir. Harvest intervals vary by site class from 12 to 100+ years.

SLI1 - Individual selection cuts from 200 to 125 ft²/ac. Harvested with uniform selection over diameter classes and species. Harvest intervals vary by site class from 60 to 100+ years. Assumes natural regeneration as predicted by the approved-FPS growth model. No species preferences were specified in the model and thus FPS selected trees randomly for harvest.

SLGP - Group selection cuts from 200 to 125 ft²/ac, less than 2.5 acre openings. Harvest intervals vary by site class from 60 to 100+ years. Assumes natural regeneration as predicted by

the approved-FPS growth model. No species preferences were specified in the model and thus FPS selected trees randomly for harvest.

The following list of legal and management constraints were considered when parameterizing the model:

Stream Class 1 - 150 foot buffer around Class 1 waterways

Stream Class 2 - 100 foot buffer around Class 2 waterways

Stream Class 3 - 50 foot buffer around Class 3 waterways

Stream Class 4 - 100 foot buffer around Class 4 waterways

NDDDB Species - Natural Diversity Database species subject to surveying and habitat and avoidance requirements

Federal List - Subset of NDDDB species that are threatened and endangered under federal law; Pacific fisher is the only listed species in the project

Road - 25 foot buffer

Northern Spotted Owl Detections - No changes to nesting habitat within 500 feet; no changes to roosting habitat within 1000 feet

Northern Spotted Owl Territories - 500 acres of owl habitat must be maintained within 0.7 miles of NSO detections, and 1336 acres within 1.3 miles

Salamander Detections - Salamander observations from landowner data.

Pacific Fisher Detections - Pacific fisher observations from landowner data

Clear Cut Adjacency - Forest Practice Rules for even-aged silviculture require at least 300 feet between harvested units

Stocking Standards - Minimum planting and residual basal area standards for Resource Conservation from the Forest Practice Rules

Restricted Zones - Spatial harvesting limits imposed by the above riparian and wildlife constraints.

Site index was assigned to stands by using simple aggregation by leading species. Site index was calculated by applying site tree measurements into species-specific equations from Hanson, et al. (2002). The mean site index as calculated within each Stand Type as defined by leading species (i.e. Redwood, Douglas Fir, Mixed Conifer, Mixed Pine, Hardwood, and Alder) was tabulated and assigned to all stands within that type. Site Indices were maintained for stands in which site index trees were measured.

2. Describe and estimate the project's baseline onsite carbon stocks. Explain any annual changes in baseline carbon stocks over time.

Modeled above ground carbon stocks in the baseline scenario averaged over 100 year is 137.3 tCO₂e/acre. This is not below the Common Practice value for the Project Area (136.9 tCO₂e/acre).

Annual changes in baseline carbon stocks are the result of considering all legal and financial constraints in the model.

The baseline model (see Attachment G) shows an initial dip in carbon stocks followed by regrowth. This reflects an increase in harvest levels to recover the costs of acquiring the property.

A graph portraying the baseline onsite carbon stocks, labeled "Attachment G," and a diagram of the baseline incorporating all required carbon stocks, labeled "Attachment H," are required. See Part X of this listing document for more information.

- 3. Identify the approved growth model that will be used for the project.**
Forest Projection and Planning System (FPS) version 7.2.3

4. Harvest Planning

- a. Is harvesting planned in the Project Area?**

If "yes," proceed to question 4b. Otherwise, skip to question A5.

☒ **Yes**
☐ **No**

- b. Will the project use a harvest schedule model?**

If "yes," proceed to question 4c. Otherwise, skip to question A5.

☒ **Yes**
☐ **No**

- c. How do you plan to address age class and stratification as part of your harvest scheduling?**

Vegetation was stratified by species, size, and stocking. These strata were clipped to the Project Area and used for modeling purposes. Areas by vegetation stratum were subdivided into modeling units. Each modeling unit is modeled individually.

- 5. Provide an estimate of carbon that will be stored long-term in harvested wood products in the baseline.**
9,900 tCO₂e

B. Required for Improved Forest Management Projects on Private Lands ONLY

- 1. Provide the estimated initial above ground standing live carbon stock per acre for the project, if known.**
180.56 tCO₂e/acre

- 2. Provide the estimated adjusted above ground standing live carb stock per acre, if known.**
168.39 tCO₂e/acre

- 3. Provide the Common Practice statistic associated with the Project Area.**
136.9 tCO₂e/acre

- 4. Are the Project Area's initial above-ground standing live carbon stocks per acre above or below Common Practice?**

If below Common Practice, what is the High Stocking Reference for the Project Area?

Further documentation is required if project below Common Practice. Submit supporting documents as attachments labeled "Attachment I." See Part X of this listing document for more information.

☒ **Above**
☐ **Below**

- 5. Does the Forest Owner(s) and its affiliate(s) own land in fee or hold timber rights on land outside the Project Area?**

If "no," skip to question B.6.

☒ **Yes**
☐ **No**

If "yes" does the Protocol require the use of a weighted average carbon stock on lands in the same Logical Management Unit (LMU, as defined in Section 6.2.1.1)?

If "no," skip to question B.6.

☐ **Yes**
☒ **No**

If "yes," is inventory data available for the LMU or will the OPO use a stratified vegetation analysis?

☐ **Data available for LMU**
☐ **Stratified Vegetation Analysis**

- 6. Provide a general description of the legal constraints affecting forest management activities in the Project Area; include a description of each constraint (referring to Section 6.2.1.2 in the Protocol) as well as a narrative those constraints have on forest management.**

Western Rivers Forestry will conform with all applicable state and federal regulations governing timber harvesting and endangered species.

In addition to applicable state and federal regulations, all management will abide by restrictions listed on the property itself. There are currently several categories of encumbrances on the title which could impact land management activities. During the acquisition process Western Rivers Forestry recorded a grant agreement in favor of California Wildlife Conservation Board. This grant agreement identifies increasing mature forest structure, improving water quality, and

improving wildlife habitat as primary management objectives, but it does not restrict Western Rivers Forestry's ability to conduct timber harvests on the property. Furthermore, this grant agreement was recorded on March 16, 2015, which is within one year of the project commencement date. A copy of the Grant Agreement has been included as Attachment K.

Other constraints can be grouped into the following major categories: oil, gas, hydrocarbon, and mineral rights; right-of-way grants and access easements, and utility easements. Since these title restrictions do not define clear operational actions that will be undertaken on restricted areas, they are not modeled as part of the baseline carbon calculation. Timber harvest may occur on any of these encumbered areas. There are no current Timber Harvest Plans (THPs) currently on file for the project area.

The following list of legal and management constraints were considered when parameterizing the model:

Stream Class 1 - 150 foot buffer around Class 1 waterways

Stream Class 2 - 100 foot buffer around Class 2 waterways

Stream Class 3 - 50 foot buffer around Class 3 waterways

Stream Class 4 - 100 foot buffer around Class 4 waterways

NDDDB Species - Natural Diversity Database species subject to surveying and habitat and avoidance requirements

Federal List - Subset of NDDDB species that are threatened and endangered under federal law; Pacific fisher is the only listed species in the project

Road - 25 foot buffer

Northern Spotted Owl Detections - No changes to nesting habitat within 500 feet; no changes to roosting habitat within 1000 feet

Northern Spotted Owl Territories - 500 acres of owl habitat must be maintained within 0.7 miles of NSO detections, and 1336 acres within 1.3 miles

Salamander Detections - Salamander observations from landowner data.

Pacific Fisher Detections - Pacific fisher observations from landowner data

Clear Cut Adjacency - Forest Practice Rules for even-aged silviculture require at least 300 feet between harvested units

Stocking Standards - Minimum planting and residual basal area standards for Resource Conservation from the Forest Practice Rules

Restricted Zones - Spatial harvesting limits imposed by the above riparian and wildlife constraints.

7. Provide a description of the modeling techniques used to simulate the effects of the constraint.

The following silvicultural prescriptions were applied to constrained areas within baseline and project modeling:

Stream Class 1 - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Stream Class 2 - No management in project model or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Stream Class 3 - No management in project model. Assumed natural regeneration as predicted by the approved-FPS growth model. Selection cuts from 380 to 300 ft²/ac in baseline model. Harvested with uniform selection over diameter classes and species. Harvest intervals vary by site class from 60 to 100+ years. Assumes natural regeneration. No species preferences were specified in the model and thus FPS selected trees randomly for harvest.

Stream Class 4 - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Steep Streamside Slope Management Zones - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

NDDDB Species - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Federal List - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Wild and Scenic River - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Road - Not modeled, assumes no carbon stocks.

Northern Spotted Owl detections - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Northern Spotted Owl territories - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Salamander detections - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

Pacific Fisher detections - No management in either project or baseline models. Assumes natural regeneration as predicted by the approved-FPS growth model.

8. How does the OPO demonstrate financial feasibility of the growth and harvesting regime assumed for the baseline? (check one of the boxes)

- ☐ Conducting a financial analysis of the anticipated growth and harvesting regime that captures all relevant costs and returns, taking into consideration all legal, physical, and biological constraints, using regional norms or documented costs and returns for the project area or other properties in the Forest Project's Assessment Area
- ☒ Providing evidence that activities similar to the proposed baseline growth and harvesting regime have taken place on other properties within the Forest Project's Assessment Area within the past 15 years

Supporting documentation is required. Submit as attachment labeled "Attachment J." See Part X of this listing document for more information.

C. Required for Improved Forest Management Projects on Public Lands ONLY

1. Has an initial forest carbon inventory been conducted for the Project Area?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Provide a projection of future changes to Project Area forest carbon stocks extrapolating from historical trends.	
3. Explain how current public policy will affect onsite carbon stocks and how the baseline modeling incorporates constraints imposed by all applicable statutes, regulations, policies, plans, and activity-based funding.	
4. Have carbon stocks in the Project Area been increasing or declining over the preceding ten-year period?	<input type="checkbox"/> Increasing <input type="checkbox"/> Declining

PART IX. ADDITIONAL QUESTIONS

A. Have any lands within the Project Area ever been listed or registered with an offset project registry or program in the past? <i>If "yes," identify the registry or program and provide details on the issued credits below.</i>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B. Have greenhouse gas emission reductions or removal enhancements associated with lands within the Project Area been credited or claimed for the purpose of greenhouse gas mitigation or reduction goals, whether in a voluntary or regulatory context? <i>If "yes," identify the registry or program and provide details on the issued credits below.</i>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Registry/Program: N/A	Reporting Period(s): N/A	Vintage(s): N/A
		Number of Credits Issued: N/A

PART X. ATTACHMENTS

A. If the answer to Part IV.A is "yes," provide documentation (e.g., deed of trust, title report, etc.) showing the OPO's ownership interest in the property and its interest in the trees and standing timber on the property. If the answer to Part IV.A is "no," provide documentation supporting the explanation of the OPO's right to undertake and list the project.

B. If the answer to Part IV.C is "public," provide documentation demonstrating explicit approval of the offset project's management activities and baseline including any public vetting processes necessary to evaluate management and policy decisions concerning the offset project. ☒ N/A

C. If a Qualified Conservation Easement (QCE) has been recorded, provide a copy. The listing information contained in this form and the documents attached to it will eventually be submitted to ARB so submitting a copy of the QCE as an attachment to this listing document fulfills the requirement in 9.1.1.1(18)(a) of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014 to provide ARB with a copy. ☒ N/A

D. If the project is located on one of the categories of Tribal land listed in Part IV.E, provide documentation demonstrating that the land within the Project Area is owned by a tribe or private entity. Also provide documentation that demonstrates the existence of a limited waiver of sovereign immunity between ARB and the governing body of the Tribe entered into pursuant to section 95975(I) of the Cap-and-Trade Regulation. ☒ N/A

E. Attach map(s) of the Project Area including:

- Public and private roads
- Towns
- Major watercourses (4th order or greater), water bodies, and watersheds
- Topography
- Townships, ranges, and sections or latitude and longitude
- Existing land cover and land use (optional)
- Forest vegetation types (optional)
- Site classes (optional)
- Land pressures and climate zone/classification (optional)
- Historical land uses, current zoning, and projected land use within the Project Area (optional)
- A georeferenced shape file (or other electronic file that can be read in a geographic information system) that clearly identifies the Project Area and boundaries. *Note that the georeferenced shape file may constitute the required map if it includes the required map information listed above.*

F. Provide supporting documentation demonstrating that the offset project takes places on land that has greater than 10 percent tree canopy cover.

G. Attach a graph portraying the baseline onsite carbon stocks with time depicted on the x-axis and metric tons CO₂e depicted on the y-axis.





H. Attach a diagram of the baseline incorporating all required carbon stocks.

I. For projects on private lands ONLY: If the Project Area's initial above-ground standing live carbon stocks are below

Common Practice, submit an affidavit testifying that the inventory depicted over the past 10 years (used to determine the High Stocking Reference for the Project Area) is reasonably accurate and a summary of volume harvested over the past 10 years. ☒ N/A

- J. For projects on private lands ONLY: Provide a description and supporting evidence, if applicable, that the growth and harvesting regime assumed for the baseline is financially feasible based on the qualifications in Section 6.2.1.3 of the Protocol. ☐ N/A

PART XI. ATTESTATIONS AND OPO SIGNATURE

 Initial	I certify under penalty of perjury under the laws of the State of California the GHG reductions and/or GHG removal enhancements for			
	Project Name: Blue Creek	from	Crediting Period Start Date: 3/19/2015	to Crediting Period End Date: 3/18/2040
will be measured in accordance with the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 and all information required to be submitted to ARB is true, accurate, and complete.				
 Initial	I understand I am voluntarily participating in the California Greenhouse Gas Cap-and-Trade Program under title 17, article 5, and by doing so, I am now subject to all regulatory requirements and enforcement mechanisms of this program and subject myself to the jurisdiction of California as the exclusive venue to resolve any and all disputes arising from the enforcement of provisions in this article.			
 Initial	I understand that the offset project activity and implementation of the offset project must be in accordance with all applicable local, regional, and national environmental and health and safety laws and regulations that apply to the offset project location. I understand that offset projects are not eligible to receive ARB or registry offset credits for GHG reductions and GHG removal enhancements that are not in compliance with the requirements of the cap-and-trade program.			
In signing this form, I certify under penalty of perjury of the laws of California that the information contained in this form is true, accurate, and complete. I further certify that I am an Account Representative of the Offset Project Operator (OPO).				
SIGNATURE: 		PRINTED NAME: Sue Doroff		
TITLE: President, Western Rivers Forestry		DATE: OCT 14, 2015		

Background for Application of Listing an Improved Forest Management U.S. Forest Offset Project

Section 95975 of the Cap-and-Trade Regulation describes the requirements and process for an Offset Project Operator (OPO) or Authorized Project Designee (APD) to list an offset project with an approved Offset Project Registry. This form is designed to help an OPO or APD fulfill the requirements of Section 95975 of the Cap-and-Trade Regulation and of Section 9.1.1 of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014, for listing an offset project. The U.S. Forest protocol designates three project types: Avoided Conversion, Improved Forest Management, and Reforestation. This form is designed for Improved Forest Management projects only. The information in the completed form should be submitted to the approved Offset Project Registry with which the OPO or APD would like their offset project listed.

Where to Submit Information Contained in This Form

Please complete the information on the form using your computer. Then print, sign, and scan the form. The completed and signed information and all supporting documentation should be submitted to the appropriate [Offset Project Registry](#).

Copies of this form can be downloaded from the ARB website at:
<http://www.arb.ca.gov/cc/capandtrade/offsets/forms/forms.htm>

Detailed Instructions for Application for Listing an Improved Forest Management U.S. Forest Offset Project

This form is protected with restricted editing to facilitate completing the form. If the applicant wishes to unprotect the form, the password is "form".

Part I. Entity Applying for Listing:

- Indicate whether the Offset Project Operator (OPO) or Authorized Project Designee (APD) is submitting the information for project listing. Section 95975(a) of the Cap-and-Trade Regulation requires that the OPO and, if applicable, the APD must register with ARB for the Cap-and-Trade Program prior to listing a project. It also requires that neither the OPO nor APD be subject to any Holding Account restrictions imposed as part of an enforcement action. To register with ARB, please visit the website for Compliance Instrument Tracking System Services (CITSS): <https://www.wci-citss.org/>
- List the name, organization, phone number, and email address of the person submitting the information. This person should be an employee of the OPO or APD, whichever entity is making the submission. The person submitting the information need not be the same person as the contact person listed for the OPO or APD in Part III and also need not be the person signing the form in Part XI.
- The person submitting the information should indicate the date the form is completed.

Part II. Offset Project Information:

- Provide the name for the offset project. Indicate the offset project commencement date and the start and end dates of the first reporting period; approximations are acceptable if precise dates are unknown.
- Project commencement for an Improved Forest Management Project must be linked to a discrete, verifiable action that delineates a change in practice that increases sequestration and/or decreases emissions relative to the forest project's baseline. This date could be when the Project Area is transferred to public ownership, when a conservation easement on the Project Area is recorded, or when submitting the offset project listing information.

Part III. OPO/APD Information:

- Enter contact information for the OPO and APD requesting the offset project listing. Every offset project will have an OPO. If an offset project does not have an APD, please mark the box indicating the Offset Project does not have an APD and leave the remaining fields blank.
- For both the OPO and, if applicable, the APD, enter the entity's name, its mailing address, and the name, phone number, and email address of a contact person for the entity. Also include its CITSS ID number. The CITSS ID is six characters in length, with two letters followed by four numbers (e.g., "

CA1234"). **DO NOT PROVIDE THE CONFIDENTIAL CITSS ACCOUNT NUMBER**, which begins with the CITSS ID number followed by a hyphen and more numbers.

Part IV. Land Ownership:

- This part includes questions regarding land ownership and property interests.
- Further documentation is required based on the responses to some questions. See Part X of this listing form for more information on the precise requirements.

Part V. Offset Project Area:

- This part asks for qualitative descriptions of the offset Project Area.
- Maps are required to complement the descriptions provided in this part. See Part X of this listing form for more information on the precise requirements.
- The Project Area should be determined following the requirements of Section 4 of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014.
- Assessment areas shall be determined by referencing the Assessment Area Data File available at: <http://www.arb.ca.gov/cc/capandtrade/protocols/usforestprojects.htm>

Part VI. Offset Project Eligibility:

- The questions in this part are designed to facilitate the determination of project eligibility for Improved Forest Management Projects.
- Further documentation is required based on the responses to some questions. See Part X of this listing form for more information on the precise requirements.
- Details on the eligibility requirements for Improved Forest Management Projects can be found in Sections 2.1.2, 3.1, and 3.8 of the Compliance Offset Protocol U.S. Forest Project, November 14, 2014.
- Details on the Natural Forest Management criteria can be found in Table 3.2 in the Compliance Offset Protocol U.S. Forest Project, November 14, 2014.

Part VII. Carbon Stock Inventory:

- Projects are not required to have completed a full carbon stock inventory at the time of listing, but OPOs/APDs should be familiar with Appendix A and have a plan for how they will meet the requirements therein. Therefore, a general description of the project's inventory methods and procedures, consistent with the requirements in Appendix A.3, is required at the time of listing. ARB recognizes that some information provided will be preliminary and based on best estimates. If the project's inventory methodology changes between the time of listing and submission of the first OPDR, this should be reported as a change to the information submitted at project listing when submitting the first OPDR.
- Section 6.2 of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014 outlines the approved quantification methodologies for Improved Forest Management Projects. Further details on completing a forest project carbon inventory can be found in Appendix A of the Protocol.
- Follow the steps in Appendix D of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014 to quantify the project's reversal risk rating.
- The project's expected contribution to the Forest Buffer Account is determined annually based upon the project's risk of reversal and is calculated by multiplying the project specific reversal risk rating by the total net GHG reductions/removals achieved by the project. An approximation of the contribution to the Forest Buffer Account is acceptable.

Part VIII. Offset Project Baseline:

- Projects are not required to have a finalized baseline at the time of listing, but OPOs/APDs should be familiar with Appendix B and have a plan for how they will meet the requirements therein. A complete modeling plan reflecting the requirements in Appendix B.3 is therefore required at the time of listing. ARB recognizes that some information provided will be preliminary or based on best estimates. If the project's modeling plan or baseline estimates change between the time of listing and submission of the first OPDR, this should be reported as a change to the information submitted at project listing when submitting the first OPDR.
- Note that IFM projects located on public land must present documentation demonstrating explicit approval of the offset project's management activities and baseline. These projects may report changes to the baseline within the initial OPDR if the changes have gone through a public review process and meet the Protocol requirements regarding explicit approval of the project's baseline.
- This part is divided into three sections: questions required for all Improved Forest Management Projects; questions for Improved Forest Management Projects on private lands; and questions for

Improved Forest Management Projects on public lands. Answer the questions applicable to the project.

- Section 6.2 of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014 outlines the approved quantification methodologies for Improved Forest Management Projects. Instructions for considering legal and financial constraints can be found in Sections 6.2.1.2 and 6.2.1.3, respectively. Further details on modeling carbon stocks can be found in Appendix B of the Protocol.
- ARB approved growth models can be found in Appendix B, Section B.1 of the Compliance Offset Protocol U.S. Forest Projects, November 14, 2014.
- When a requirement is not applicable to the project being listed, please select the "N/A" (Not Applicable) checkbox next to the requirement so that it is clear that the question was not inadvertently left unanswered.

Part IX. Additional Questions:

- Answer both questions. If the answer to either question is "yes," identify the registry or program and provide details on the issued credits in the space provided.

Part X. Attachments:

- Provide each attachment on a separate sheet of paper and submit along with the completed application for listing.
- To aid with tracking each attachment, it is recommended that the attachments are labeled to correspond with the letter in Part X that they refer to (e.g. "Attachment B").
- When an attachment is not applicable to the project being listed, please select the "N/A" (Not Applicable) checkbox next to the requirement so that it is clear that the attachment was not inadvertently left off.

Part XI. Attestations and OPO Signature:

- Section 95975(c) of the Cap-and-Trade Regulation requires three attestations for listing an offset project. The required attestations are provided in this section. Each attestation should be initialed by the person signing the form.
- The first attestation requires the applicant to provide the offset project name and the start and end dates of the crediting period to complete the statement. The offset project name should match the name entered in Part II. The dates for the offset project's crediting period must also be provided. Please note that the dates provided in the attestation are for the crediting period, not for the first reporting period provided in Part II. The crediting period dates may be approximate if precise dates are not known.
- Amendments adopted in April 2014 to section 95975(d) require the attestations "be provided to an Offset Project Registry with the listing information, if being listed with an Offset Project Registry."
- The individual signing the document must be registered in CITSS as the OPO's Primary Account Representative or Alternate Account Representative. The individual signing the document may be an APD employee and/or representative; but to sign the document, the individual must be an Account Representative on the OPO's CITSS account.
- Please provide the person's signature, printed name, corporate title, and date signed.

Please contact your Offset Project Registry with any questions.