

U.S. FOREST OFFSET PROJECT DATA REPORT ANNUAL REPORTING PERIOD – ALL PROJECT TYPES

OPR Staff Use Only	Date Report Received:	OPR Tracking Number:	Date Report Reviewed:	OPR Staff Use Only
---------------------------	-----------------------	----------------------	-----------------------	---------------------------

Complete for all reporting years. *Entities submitting the project's first Offset Project Data Report must submit the information requested in both **Initial Reporting Period** and the **Annual Reporting** forms to the appropriate Offset Project Registry. For every reporting period thereafter, submit only the information requested in the Annual Reporting Period form.*

PART I. ENTITY SUBMITTING REPORT

Is this form being submitted by the Offset Project Operator (OPO) or by the Authorized Project Designee (APD)? <i>Note: The person completing this form should be an OPO/APD employee.</i>				<input type="checkbox"/> OPO <input checked="" type="checkbox"/> APD
Date Report Completed: June 13, 2016	Person Completing Report: James D. Clark	Phone Number: 707-485-7211	Email Address: jimclark@ncrm.com	

PART II. OFFSET PROJECT INFORMATION

Offset Project Name: Brush Creek		OPR Project ID#: ACR200	ARB Project ID# (if known): CAFR5200	
Reporting Period Start Date: December 10, 2013	Reporting Period End Date: June 30, 2015		Offset Project Commencement Date: December 10, 2013	
Date of Last Full (On-Site) Verification: N/A	Is this report being submitted for a verification year?			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is this Offset Project Data Report (OPDR) being submitted for the project's initial Reporting Period? If "yes", the entity submitting this report must also submit the information required in section 9.1.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011. To submit that information, an OPO/APD submitting an OPDR may use one of three Initial Reporting Forms identified in the question immediately below.				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
With this Annual OPDR, is any one of the following three Initial Reporting Forms also being submitted? U.S. Forest Offset Project Data Report Initial Reporting Period - <input type="checkbox"/> Reforestation <input checked="" type="checkbox"/> Improved Forest Management <input type="checkbox"/> Avoided Conversion				

PART III. OPO/APD INFORMATION

A. OPO				
OPO Name: Steve Miller and Florence Miller Co-Trustees of the Edward Miller Trust			OPO's CITSS ID#: CA <u>1</u> <u>5</u> <u>5</u> <u>7</u>	
Mailing Address: PO Box 1818		City: Healdsburg	State: CA	Zip: 95548
Contact Person: Steve Miller	Phone Number: (707) 953-4584	Email Address: murphybs@sonic.net		
B. APD (if applicable) <input type="checkbox"/> No APD/Not Applicable				
APD Name: James D. Clark			APD's CITSS ID#: CA <u>1</u> <u>5</u> <u>6</u> <u>9</u>	
Mailing Address: PO Box 435		City: Calpella	State: CA	Zip: 95418
Contact Person: James D. Clark	Phone Number: (707) 485-7211	Email Address: jimclark@ncrm.com		

PART IV. OFFSET PROJECT ELIGIBILITY REQUIREMENTS

A. Have the Forest Project and associated Project Lands met and been in compliance with all local, state, and federal regulatory requirements during the Reporting Period?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If no, provide an explanation of the non-compliance. N/A	
B. Indicate how the offset project meets the definition of Natural Forest Management per Table 3.2 in the Compliance Offset Protocol US Forest Offset Projects, October 20, 2011 by completing Questions B1-B4 below: <i>Note: Reforestation projects with deferred inventory and Project Boundaries are still required to complete Questions B1-B4.</i>	
1. Native species: a) Does 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> See Addendum to OPDR (Annual) IV.B.1.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b) Describe how the project will result in achieving a 95% native species goal over the project life. N/A	
2. Composition of native species: a) Does the Project Area naturally consist of a mixed species distribution such that no single species' prevalence 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> See Addendum to OPDR (Annual) IV.B.2	<input 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 <input checked="" type="checkbox"/> N/A
3. Distribution of age classes/sustainable management: a) Indicate how the project meets the requirement for sustainable management if regeneration or commercial harvesting is either planned or initiated 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). <i>The full text associated for the options below is found in section 3.8.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.</i> <input checked="" type="checkbox"/> Third party certification <input type="checkbox"/> Adhere to a renewable long-term management plan <input type="checkbox"/> Employs uneven-aged silvicultural practices & maintain canopy retention averaging 40% across forest <input type="checkbox"/> Not applicable, no commercial harvesting in planned within the project area See Addendum to OPDR (Annual) IV.B.3.	
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> See Addendum to OPDR (Annual) IV.B.3.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Explain how the project demonstrates continuous progress toward meeting this requirement within the next 25 years. N/A	
4. Structural elements (standing and lying dead wood): How does the project ensure that structural elements are retained in sufficient quantities throughout the project life? See Addendum to OPDR (Annual) IV.B.4.	
C. Has there been a decrease in the standing live carbon stocks within the Project Area over any 10-year consecutive period?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<i>For the Initial Reporting Period, check "No." If "No," skip to Part V. If yes, answer questions C1 and C2.</i>		
1. If yes, identify the appropriate option and provide additional documentation. <div style="display: flex; flex-direction: column; gap: 5px;"> <div><input type="checkbox"/> Decrease is due to the necessity to substantially improve the Project Area's resistance to wildfire, insect, or disease risks. Actions that will be taken to reduce the risks must be documented and the techniques used to improve resistance must be supported by relevant published peer reviewed research.</div> <div><input type="checkbox"/> Decrease is associated with a planned balancing of age classes and is detailed in a long-term management plan that demonstrates harvest levels can be permanently sustained over time and that is sanctioned and monitored by a state or federal agency. This documentation must be submitted at the time of the Project's Listing.</div> <div><input type="checkbox"/> Decrease is part of normal silviculture cycles for forest ownerships less than 1,000 acres.</div> <div><input checked="" type="checkbox"/> N/A</div> </div> <p><i>Note: Documentation is required to be submitted. See Section X for details.</i></p>		
2. Has the Project's inventory of standing live carbon stocks fallen below the Project's baseline standing live carbon stocks, or 20 percent less than the Project's standing live carbon stocks at the project's initiation (whichever is higher)?		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
PART V. PROJECT CHANGES		
A. Is all the information in the offset project listing still accurate?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If no, provide updates to the relevant listing information. See Addendum to OPDR (Annual) V.A.		
B. Have there been any changes in the status of the Forest Owner including, if applicable per Section 3.8.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011, the acquisition of new forest landholdings?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, describe the changes. Include the sale or transfer of any portion of land within Project Area. N/A		
C. Optional: Has a Qualified Conservation Easement (QCE) been recorded since the previous Reporting Period? <i>If this is for the Initial Reporting Period, check "Yes" if a QCE has been recorded since Listing, check "No" otherwise. If "No," skip to Question D.</i>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Optional: If yes, provide the date the QCE was recorded. <i>Also provide a copy of the QCE to ARB.</i> N/A		
D. Optional: Have there been any modifications to the inventory methodology of any carbon pools included in the project's boundary since the last Reporting Period? <i>All projects are required to document any modifications to inventory methodologies in a change log and obtain approval in advance. Qualifying Reforestation Projects may defer answering this question until the second full verification. If this is for the Initial Reporting Period, check "No," unless there have been modifications since project listing, in which case, check "Yes."</i>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Defer
Optional: If yes, describe the modifications. N/A		
PART VI. REVERSALS		
<i>Note: Qualifying Reforestation Projects may defer items marked with an asterisk until the second verification.</i>		
A. Has a reversal occurred during the Reporting Period covered by this report? <i>If this is for the Initial Reporting Period, check "No."</i> <i>If "No," skip to question B.</i>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has the reversal been classified as intentional or unintentional?		<input type="checkbox"/> Intentional <input type="checkbox"/> Unintentional <input checked="" type="checkbox"/> N/A
Optional: Date(s) Reversal Occurred: N/A	Optional: Estimated Quantity of Reversal in Units of MtCO ₂ e: N/A	
Describe and explain the reversal. N/A		
What is the status of the compensation for the reversal? N/A		

B. For verification years <u>ONLY</u>: Has a reversal occurred during the previous six years? <i>If this is for the Initial Reporting Period, check "No."</i>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has the reversal been classified as intentional or unintentional?		<input type="checkbox"/> Intentional <input type="checkbox"/> Unintentional <input checked="" type="checkbox"/> N/A
Optional: Date(s) Reversal Occurred: N/A	Optional: Estimated Quantity of Reversal in Units of MtCO₂e: N/A	
Describe and explain the reversal. N/A		
What is the status of the compensation for the reversal? N/A		
C. What is the Project's reversal risk rating?	Risk Rating: 19.2%	<input type="checkbox"/> Defer
What is the Project's fire risk based on level of fuel treatments?	<input type="checkbox"/> High (2%) <input type="checkbox"/> Medium (2.652%) <input type="checkbox"/> Low (3.304%) <input checked="" type="checkbox"/> None (4 %)	

PART VII. HARVEST VOLUMES AND CARBON IN WOOD PRODUCTS

Note: Qualifying Reforestation Projects may defer items marked with an asterisk until the second verification.

A. *Provide an estimate of the harvest volume for this Reporting Period. This estimate refers to the volume of trees harvested for wood products only.	Harvest Volume (lbs): 0	<input type="checkbox"/> Defer
B. *Indicate the estimated mill efficiency for wood products produced from the Project Area following requirements in Appendix C, Section C.2.	Mill Efficiency (percent): 67.5	<input type="checkbox"/> Defer
C. *Provide an estimate of carbon in harvested wood products associated with the harvest volumes reported for this Reporting Period.	Carbon estimate (MtCO₂e): 0	<input type="checkbox"/> Defer

PART VIII. CARBON STOCKS

In the appropriate columns below, enter the name/identification of all required carbon pools and its estimated carbon stock (MtCO₂e) for the current Reporting Period.

For verification years ONLY: Report the estimated carbon stock for every year since the Project's last verification.

☐ Defer

Reforestation Projects may defer full inventory of carbon stocks not affected by site preparation until second verification. If deferring, carbon stocks affected by site preparation must still be reported below.

See Addendum to OPDR (Annual) VIII.

Carbon Pool <i>Identify the pool by the SSR code (e.g., AC-1) and description (Standing live carbon) in Tables 5.1-5.3.</i>	Current Reporting Period	Current Reporting Period minus 1 year	Current Reporting Period minus 2 years	Current Reporting Period minus 3 years	Current Reporting Period minus 4 years	Current Reporting Period minus 5 years
	12/10/2013 to 6/30/2015	/	/	/	/	/
IFM-1 Standing Live carbon	433,297					
IFM-3 Standing Dead Carbon	7,093					
IFM-7 Carbon in in-use Forest Products	0					
IFM-8 Forest Product Carbon in Landfills	0					

PART IX. BASELINE CARBON STOCKS

In the appropriate columns below, enter the name/identification of all required carbon pools and its estimated **baseline** carbon stock (MtCO₂e) for the current Reporting Period.

For verification years **ONLY**: Report the estimated **baseline** carbon stock for every year since the Project's last verification.

☐ Defer

Reforestation Projects may defer estimating baseline carbon stocks not affected by site preparation until a full inventory is obtained. If deferring, baseline estimates of carbon stock affected by site preparation must still be reported below.

See Addendum to OPDR (Annual) XI.

Carbon Pool <i>Identify the pool by the SSR code (e.g., AC-1) and description (Standing live carbon) in Tables 5.1-5.3.</i>	Current Reporting Period	Current Reporting Period minus 1 year	Current Reporting Period minus 2 years	Current Reporting Period minus 3 years	Current Reporting Period minus 4 years	Current Reporting Period minus 5 years
	12/10/2013 to 6/30/2015	/ to /	/ to /	/ to /	/ to /	/ to /
IFM-1 Standing Live carbon	361,104					
IFM-3 Standing Dead Carbon	6,956					
IFM-7 Carbon in In-use Forest Products (This value is calculated from the average annual In-use Forest Products generated by the baseline of 964.69 times the 1.5534 year reporting period length).	1,499					
IFM-8 Forest Product Carbon in Landfills (This value is calculated from the average annual carbon in Landfill 623.25 times the 1.5534 year reporting period length).	968					
IFM-14 Biological emissions /removals from changes in harvesting on forestlands outside the Project Area (This value is calculated from the average annual carbon in harvested trees prior to delivery to the mill derived from the baseline analysis of 7,122.63 times the 1.5534 year reporting period length. The secondary Effects Value presented in Part X(A) below is 20% of the value reported here).	11,064					

PART X. QUANTIFICATION FACTORS

In the appropriate column below, enter the value for the current Reporting Period.

For verification years **ONLY**: Report the estimated values for every year since the Project's last verification.

Note: Qualifying Reforestation Projects may defer items marked with an asterisk until the second verification.

See Addendum to OPDR (Annual) XI.

	Current Reporting Period	Current Reporting Period minus 1 year	Current Reporting Period minus 2 years	Current Reporting Period minus 3 years	Current Reporting Period minus 4 years	Current Reporting Period minus 5 years
	12/10/2013 to 6/30/2015	/ to /	/ to /	/ to /	/ to /	/ to /
A. Secondary Effects (MtCO ₂ e)	-2,213					
B. Wood Products (MtCO ₂ e)	-1,973					
C. *Confidence Deduction (%) <input type="checkbox"/> Defer	0.5					
D. *Forest Buffer Account Contribution (MtCO ₂ e) <input type="checkbox"/> Defer	12,635					
D. For Avoided Conversion Projects ONLY : What is the Project's uncertainty discount factor?					%	<input checked="" type="checkbox"/> N/A

PART XI. TOTAL NET GHG REDUCTIONS AND GHG REMOVAL ENHANCEMENTS (QR_y)


In the appropriate column below, enter the total net GHG Reductions and GHG Removal Enhancements (MtCO₂e) for the current Reporting Period and all Reporting Periods since the Project's last full verification.

For verification years **ONLY**: Report the total net GHG Reductions and GHG Removal Enhancements for every year since the Project's last verification.

See Addendum to OPDR (Annual) XI.

Current Reporting Period	Current Reporting Period minus 1 year	Current Reporting Period minus 2 years	Current Reporting Period minus 3 years	Current Reporting Period minus 4 years	Current Reporting Period minus 5 years
	/ to /	/ to /	/ to /	/ to /	/ to /
65,806					

PART XII. ATTESTATION AND OPO/APD 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: Brush Creek		from	Reporting Period Start Date: December 10, 2013	to Reporting Period End Date: June 30, 2015
	are 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.				

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 duly authorized to represent and legally bind the Offset Project Operator (OPO) on all matters related to this form.

SIGNATURE:



PRINTED NAME:

James D. Clark

TITLE:

Authorized Project Designee

DATE:

6/13/2016

Background for U.S. Forest Offset Project Data Report Annual Reporting Period – All Project Types

Section 95976(d) of the Cap-and-Trade Regulation specifies reporting requirements for offset projects participating in the Compliance Offset Program. Offset Project Operators (OPO) or Authorized Project Designees (APD) are required to submit an Offset Project Data Report (OPDR) within four months of the end of each (annual) Reporting Period. This form is designed to help OPOs and APDs provide all the information required for offset projects using Compliance Offset Protocol U.S. Forest Projects, October 20, 2011. This information is submitted to the approved Offset Project Registry that is listing the offset project and should also be provided to the ARB-accredited verification body that will be verifying the Offset Project Data Report.

Items marked as eligible for deferment by Reforestation Projects may be deferred by Reforestation Projects as qualified in section 6.1.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 until submitting the Offset Project Data Report that will undergo the second verification. If deferring, check the “defer” box and leave the remaining fields blank.

Where to Submit Information Contained in This Form

Please complete the information on the form using your computer. Then either add an electronic signature to the form or print, sign, and scan the form. The completed and signed information and all supporting documentation should be emailed to the appropriate Offset Project Registry.

This form is available from the ARB website at:

<http://www.arb.ca.gov/cc/capandtrade/offsets/forms/forms.htm>

Detailed Instructions for U.S. Forest Offset Project Data Report Annual Reporting Period – All Project Types

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 Submitting Report:

- Indicate whether the Offset Project Operator (OPO) or Authorized Project Designee (APD) is submitting this information.
- The person providing this information should indicate the date the report is completed.
- List the name, phone, and email of the person completing this report. This person should be an employee of the OPO or APD, whichever entity is submitting this information. 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 attestations in Part XII.

Part II. Offset Project Information:

- Provide the name for the offset project and its Offset Project Registry ID number, as provided by the Offset Project Registry listing the project. Also include the ARB project ID number, if known.
- Indicate the Offset Project Commencement Date and the start and end date of the Reporting Period covered by this Offset Project Data Report. Supply date of last verification.
- Indicate whether this Offset Project Data Report is being submitted for a verification year.
- Indicate if this OPDR is being submitted in the Initial Reporting Period. If yes, then the OPO/APD must also complete the appropriate U.S. Forest OPDR Initial Reporting Period Form in addition to this Annual Reporting Form. Indicate which of the Initial Reporting Period Forms is attached to this OPDR. These forms can be found at:
<http://www.arb.ca.gov/cc/capandtrade/offsets/forms/forms.htm>

Part III. OPO/APD Information:

- Provide contact information for the Offset Project Operator (OPO) and Authorized Project Designee (APD) for the offset project. Every project will have an OPO. If a project does not have an APD, please mark the box indicating the 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. Offset Project Eligibility Requirements

- A. Identify whether the project and associated lands are in compliance with all local, state and federal regulatory requirements for this reporting period. In particular, identify any non-conformance with regard to growth and harvest legal requirements that affect the project area's compliance. If there is a non-compliance within the Project Area, the OPO/APD must identify the non-compliance and provide a description and explanation.
- B. Respond to questions 1-4 to indicate how the project meets the definition of Natural Forest Management. Refer to Section 3.8.2 and Table 3.2 for more information. Responses are required for all projects. Questions pertain to Native Species, Composition of Native Species, Distribution of Age Classes, Sustainable Management, and Structural Elements.
- C. Indicate if there has been a decrease of onsite standing live carbon stocks over a 10-year consecutive period. If so, the OPO/APD must submit the appropriate supporting documentation required in Section 3.8.3 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 demonstrating that the decrease meets one of three exceptions listed in Protocol.

Part V. Project Changes

- A. Indicate if all the information in the Project Listing Form is still accurate and
- B. Indicate if a Forest Owner has acquired new landholdings and describe how the new landholdings meet the requirements of the Compliance Offset Protocol.
- C. Indicate if a Qualified Conservation Easement has been recorded since the previous Reporting Period and submit a copy of the QCE as an attachment to this report. Any changes to the legal constraints affecting the forest offset Project Area or management therein must be described in an attachment. Refer to sections 3.1, 6.1.1, 6.2.1, and 6.3.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- D. Indicate if there has been any modification to the inventory methodology of any carbon pools included in the project's boundary since the last Reporting Period. If yes, then describe any modification. If the OPO/APD has a qualified Reforestation Project that is deferring due to lack of inventory, check "defer". Refer to Appendix A.3 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 for more detailed requirements.

Part VI. Reversals

- A. Indicate if any GHG reductions or GHG removal enhancements that have been issued credits during any prior year have been reversed. If the project's GHG reductions or removal enhancements are negative, regardless of cause of the decrease, these must be reported. Indicate whether it is an intentional or unintentional reversal. This includes planned thinning or harvesting activities if they result in a negative value as specified in the Protocol. Refer to section 7 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011. If there has been a reversal include the dates the reversal occurred, MtCO₂e reversed, and the current status of the compensation of the reversal. Refer to Section 95983 of the Cap-and-Trade Regulation for information on compensating for reversals.
- B. If the Project is undergoing verification, indicate whether a reversal has occurred during the previous six years unless this OPDR is part of an Initial Reporting Period. All projects must report reversals that occurred since the previous verification. Projects submitting an Annual Offset Project Data Report must report any reversals and provide a written description and explanation of the reversal, including whether it is intentional or unintentional and the status of compensation for the reversal. If there has been a reversal include the dates the reversal occurred, MtCO₂e reversed, and the current status of the compensation of the reversal. Refer to Section 95983 of the Cap-and-Trade Regulation for information on compensating for reversals.
- C. Indicate the project's reversal risk rating following the requirements of Appendix D of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011. Part VI C. The reversal risk rating must be determined prior to listing and recalculated every year the project undergoes verification. Also indicate the project's fire risk based on the level of fuel treatments, as required in Appendix D in the Protocol.

Part VII. Harvest Volumes and Carbon in Wood Products

- A. Estimate the harvest volume in pounds of biomass with zero moisture content following the steps in Appendix C, Section C.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- B. Report the mill efficiency identified in the project's Assessment Area from the Forest Offset Protocol Resources on the ARB website:
<http://www.arb.ca.gov/cc/capandtrade/protocols/usforestprojects.htm>

- C. Report the metric tons of carbon in the harvested wood products following the quantification methodology in Appendix C of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.

Part VIII. Carbon Stocks:

- Reforestation Projects may defer full inventory of carbon stocks not affected by site preparation until second verification. If deferring, carbon stocks affected by site preparation must still be reported. Refer to section 6.1.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- Write the name and Sources, Sinks, and Reservoirs (Column "SSR") and the associated identification number found in Tables 5.1-5.3 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011 for the appropriate project type for each included carbon pool. Write the name and SSR for all required pools even if deferring the submission of data.
- Enter the current Reporting Period estimate of the identified carbon pool (MtCO₂e) in the second column. Follow the method in Appendix A, Sections A.2 and A.3 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011. Check "defer" in the space provided if deferring the submission of data.
- If submitting the Offset Project Data Report for a verification year, carbon stock estimates for every year since the last verification must be provided in the remaining columns.

Part IX. Baseline Carbon Stocks:

- Reforestation Projects may defer estimating baseline carbon stocks not affected by site preparation until a full inventory is conducted. If deferring, baseline estimates of carbon stock affected by site preparation must still be reported. Refer to section 6.1.1 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- Write the name and/or identifier of each required carbon pool in the first column. Refer to Section 5 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011. Please list the carbon pools in the same order as in Part VIII. Write the name and/or identifier of all applicable pools even if deferring the submission of data.
- Enter the current Reporting Period baseline estimate of the identified carbon pool (MtCO₂e) in the second column. Follow the method in Section 6 and Appendix B of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011. Check "defer" in the space provided if deferring the submission of data.
- If submitting the Offset Project Data Report for a verification year, carbon stock baseline estimates for every year since the last verification must be provided in the remaining columns.

Part X. Quantification Factors

- The current Reporting Period column is required for all submissions. If submitting the Offset Project Data Report for a verification year, values for every year since the last verification must be provided in the remaining columns.
- A. Estimate the project's secondary effects (MtCO₂e) including the appropriate secondary effect sources, sinks, and reservoirs required in Section 5 and following the quantification methodology in Section 6 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- B. Determine the confidence deduction (percentage) following Appendix A.4 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- C. Estimate the buffer account contribution (MtCO₂e) based upon application of the forest offset project's Reversal Risk Rating to the total net GHG Reductions and GHG Removal Enhancements.
- D. Report the calculated uncertainty discount factor (percentage) as determined following the requirements of Section 6.3 of the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011. Projects other than Avoided Conversion should check the "N/A" box.

Part XI. Total Net GHG Reductions and GHG Removal Enhancements (QRy):

- Determine the total net GHG reductions and GHG removal enhancements (MtCO₂e) following Equation 6.1 in the Compliance Offset Protocol U.S. Forest Projects, October 20, 2011.
- Current Reporting Period column is required for all submissions. If submitting the Offset Project Data Report for a verification year, the total net GHG Reductions and GHG removal enhancements for every year since the last verification must be provided in the remaining columns.

Part XII. Attestation and OPO/APD Signature:

- Section 95975(d)(5) of the Cap-and-Trade Regulation requires an attestation for Offset Project Data Reports. The attestation should be initialed by the person signing the form.

- The attestation requires the applicant to provide some information to complete the statement. The offset project name and Reporting Period start and end dates should match the information provided in Part II.
- The attestations must be submitted to ARB but need not be submitted to ARB until requesting issuance of ARB offset credits. A request for issuance of ARB offset credits requires a copy of the Offset Project Data Report, and providing the attestations on this form will satisfy the regulatory requirements.
- 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 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 individual's signature, printed name, corporate title, and date signed.



BRUSH CREEK

ACR200, CAFR5200

Addendum to OPDR for the Annual Reporting Period Form

Under

Air Resources Board

Compliance Offset Protocol – U.S. Forest Projects

Adopted: October 20, 2011

Prepared June 13, 2016

Offset Project Operator	Authorized Project Designee
Steve Miller and Florence Miller Co-Trustees of the Edward Miller Trust PO Box 1818 Healdsburg, CA 95548 (707) 953-4584	James D. Clark PO Box 435 Calpella, CA 95418 (707) 485-7211

Reporting Period

The reporting period for this Offset Project Data Report is from 12/10/2013 to 6/30/2015.

Protocol Version

Air Resources Board

Compliance Offset Protocol – U.S. forest Projects

Adopted: October 20, 2011

The OPDR and all other project documentation and reports that reference carbon stocks have been prepared and submitted by James D. Clark, California Registered Professional Forester (No. 2528).

Introduction

Brush Creek is an Improved Forest Management (IFM) Project that is seeking registration under the California Air Resources Board Compliance Offset Protocol – U.S. Forest Projects Adopted: October 20, 2011. The Brush Creek Project is owned by Steve Miller and Florence Miller Co-Trustees of the Edward Miller Trust. The Project Area is approximately 1,763 acres in size.

IV.B.1.

The Brush Creek Project Area is characterized by a mix of redwood, Douglas-fir, tanoak, pacific madrone, California bay laurel, sugar pine, red alder, and assorted native hardwoods. 100% of the Project's biomass is in native species and thus the Project meets the 95% criteria for carbon in native species.

IV.B.2.

The Brush Creek Project Area is characterized by a mix of redwood, Douglas-fir, tanoak, pacific madrone, tanoak, California bay laurel, sugar pine, red alder, and assorted native hardwoods. It is estimated that the Project Area is composed of approximately 21% redwood, 32% Douglas-fir, 4% other conifers, 36 % tanoak, and 9% other hardwoods by basal area. The Miller Land Trust intends to manage the timber stands to maintain or increase conifer stocking, ensuring that the Project continues to meet the requirements for composition of native species under Table 3.2 (page 20) of the Compliance Offset Protocol by maintaining species' basal area percentage below 65% , the Species Diversity Index from the Assessment Area Data File.

IV.B.3.

- (a) Brush Creek meets condition 1 under Section 3.8.1 (page 18) of the Compliance Offset Protocol by being certified under the American Forest Foundation Tree Farm System certification program as project ID CA-393. All of the Miller Trust's timberlands are included in the American Tree Farm System under the above listed project ID. The Miller properties were recertified in 2012 and is due for its next recertification in 2017. Certification under the American Forest Foundation satisfies condition 1 by requiring adherence to, and verification of, sustainable harvesting practices.

- (b) There are currently no immediate plans to harvest timber on the Brush Creek Project Area. In the future, Brush Creek may employ uneven-aged management practices which meet the sustainable management requirements under Table 3.2 (page 21) of the Compliance Offset Protocol by maintaining less than 40% of the Project's forested acreage in ages less than 20 years. Present conditions for the Project site already satisfy these requirements.

IV.B.4.

Brush Creek does not actively remove lying dead wood as a part of its stand management activities. It is expected that the accumulation of lying dead wood will be commensurate with recruitment from standing dead trees. Brush Creek is committed to maintaining if not increasing, the number of standing dead trees within the Project Area as a component of its forest management objectives. Brush Creek does not currently, nor does it intend in the future to actively pursue salvage operations on its timberlands. Brush Creek has a policy of allowing standing dead trees to remain and recruiting large specimen trees across its ownership as components of its overall timber management strategy.

The Brush Creek Project Area has not recently undergone any salvage harvesting. Therefore, all that must be demonstrated is that the greater of one metric ton of carbon per acre or 1% of standing live carbon stocks is present in standing dead wood, or that progress towards these targets is ongoing. The project currently contains an average of 1.08 Mg C per acre and 1.6% of standing live carbon stocks in standing dead wood. Therefore, the project currently meets the aforementioned standing dead wood target.

V.A.

The following adjustments to the Application for Listing and Improved Forest Management U.S. Forest Offset Project are listed by section number as they appear on the listing form:

II.

The end of the initial reporting period has been changed from June 9, 2014 to June 30, 2015.

In multiple incidences, references to “Miller Forest” were changed to “Brush Creek”, as appropriate.

V.C.

The Project Area acreage has been changed from 2,000 acres to 1,763.41 acres in size.

VI.B.3.a.

The manner by which 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 will be done by 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.

The method was changed from employing uneven-aged silvicultural practices and maintaining 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).

VII.B.

The list of species in the table of FIA Equations by Species and the table of Relative Density by Species and Decay Class were revised.

VII.C.

The initial standing live and standing dead stocks have been augmented, with updated figures.

VII.D.

The inventory confidence statistics were augmented with updated figures.

VIII.A.2.

The baseline has been augmented with updated figures.

VIII.A.5.

The description of modeling techniques used to simulate the effects of a constraint has been augmented, with updated figures.

VIII.B.1.

The initial above ground standing live carbon stocks have been augmented, with updated figures.

VIII.B.3.

The Common Practice Statistic for the Project Area has been changed from 165 MgCO₂e per acre to 165.50 MgCO₂e per acre.

VIII.B.3.

The method by which the Project demonstrates financial feasibility has been revised to utilize a financial analysis of the baseline harvesting regime that captures all relevant costs and returns.

VIII.

Carbon Pool	Source	Gross CO₂e Tonnes per Acre	Total Gross CO₂e Tonnes	SSR
Live Carbon Stocks	Sample Plots	245.72	433,297	IFM-1
Standing Dead Carbon Stocks	Sample Plots	3.94	6,956	IFM-3
Sum of CO ₂ -equivalent Tonnes from Required Pools		249.66	440,253	

XI. Quantification of Net GHG Reductions and GHG removal enhancements:

	Reporting Period	RP1	Notes
1	Actual Onsite Stocks	440,253	This is the total carbon in all reported pools within the Project Area, regardless of statistical confidence. ($AC_{\text{onsite}, y}$)
2	Confidence Deduction	0.5%	The confidence deduction is based on the sampling error of the combined estimate of carbon in all onsite carbon pools (see above). (CD_y)
3	Adjusted Actual Onsite Stocks (Adjusted for Confidence Deduction)	438,052	Actual onsite carbon stocks adjusted using the confidence deduction. $AC_{\text{onsite}, y} * (1 - CD_y)$
4	Annual Increment in Actual Onsite Carbon Stocks	438,052	Difference from prior year ($\Delta AC_{\text{onsite}}$). In year 1, prior year stocks are assumed to be zero, so difference is equal to initial adjusted onsite carbon stocks.
5	Baseline Onsite Carbon Stocks	368,059	Baseline estimates of onsite carbon stocks are not affected by the confidence deduction. ($BC_{\text{onsite}, y}$)
6	Annual Increment in Baseline Onsite Stocks	368,059	Difference from prior year ($\Delta BC_{\text{onsite}}$). In year 1, prior year stocks are assumed to be zero, so difference is equal to initial unadjusted) onsite carbon stocks.
7	Quantified GHG Reductions / Removals for Onsite Stocks	69,993	Row 4 minus row 6. ($\Delta AC_{\text{onsite}} - \Delta BC_{\text{onsite}}$)
Accounting for Carbon Stored in Wood Products			
8	Actual Wood Products In-use	0	Carbon stored long-term In-use, calculated from actual harvested carbon values. (Component of $AC_{\text{wp}, y}$)

9	Actual Wood Products Landfill	0	Carbon stored long-term in landfills, calculated from actual harvested carbon values. If actual harvest volumes for the year(s) are less than baseline harvest volumes, then this value is included in $AC_{wp, y}$.
10	Actual Wood Products PDM	0	Based on actual carbon in standing live carbon stocks harvested in each year(s), prior to delivery to mills (PDM). Used to calculate Secondary Effects.
11	Baseline Wood Products In-use	1,499	Carbon stored long-term In-use, calculated from averaged baseline carbon values. (Component of $BC_{wp, y}$).
12	Baseline Wood Products Landfill	968	Carbon stored long-term in landfills, calculated from averaged baseline carbon values. If actual harvest volumes for the year(s) are less than baseline harvest volumes, then this value is included in $BC_{wp, y}$.
13	Baseline Wood Products PDM	11,064	Based on carbon in standing live carbon stocks harvested each year(s) in the baseline analysis, prior to delivery to mills (PDM). Used to calculate Secondary Effects.
14	Difference in Actual and Baseline Carbon Stored in Wood Products	-2,467	Difference between actual and baseline carbon stored long-term in wood products in each year ($AC_{wp, y} - BC_{wp, y}$). May be negative.
15	Quantified GHG Reductions / Removals for Carbon Stored in Wood Products	-1,973	Equal to $(AC_{wp, y} - BC_{wp, y}) * 80\%$ (the Market Response Factor). May be negative.
Accounting for Secondary Effects			
16	PDM Difference	-11,064	The difference between the values in rows 10 and 13, above.

17	Secondary Effect Adjustment	-2,213	Either zero, if the value in row 15 is positive, or 20% of the value in row 16 if it is negative. (SE_y)
Calculation of Total Net GHG Reductions/Removals and Buffer Pool Contribution			
18	Negative Carryover from Prior Year	0	This is any negative amount from the prior year's total net GHG reductions/removals that is not due to a reversal. (N_{y-1})
19	Total Net GHG Reductions/Removals	65,806	Equal to the sum of the values in rows 7, 15, 17, and 18. (QR_y)
20	Total ARBOCs Issued	65,806	Total number of ARBOCs that ARB will issue for quantified GHG reductions/removals.
21	Risk of Reversal	19.2%	Reversal Risk Rating.
22	Required Buffer Pool Contribution	12,635	The number of ARBOCs that must be contributed to the Buffer Pool each year, based on the risk of reversal. Calculated by multiplying the Total ARBOCs Issued (row 20) by the risk of reversal (row 21). Any remainder must be rounded up to the next tonne.
23	ARBOCs Issued to the Project	53,171	Total ARBOCs issued to the Project in each year. Equal to row 20 minus row 22.