



ENVIRONMENTAL SERVICES, INC.

American Carbon Registry Project Verification Report

GreenTrees, LLC. Series GT and A-1

28 February 2011

Project Developed by:

GreenTrees, LLC
P.O. Box 193
Middleburg, VA 20118

Verification Conducted by:

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Forestry, Carbon, and GHG Services Division
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Project No. FV10004.00



ANSI ACCREDITED PROGRAM
GREENHOUSE GAS
VALIDATION AND VERIFICATION
0800



Table of Contents

Executive Summary.....	4
Project Summary.....	5
Date:	5
Compliance Years:	5
Verifier:	5
ACR Protocol:	5
Project Name:	5
Project Owner:	5
Project Developer and/or Aggregator:	5
MRV Title and Date:.....	5
Included Forests:	5
Baseline (year and metric tons of CO ₂ e and ERTs):.....	6
ERTs Verified:	6
Project Contact Information Including Roles and Responsibilities	7
Scope of Verification Work	7
Level of Assurance:.....	7
Objective:	8
Criteria:	8
Scope:	8
Materiality:	8
Handling of Records:	9
Client Statements Regarding Verification Status:.....	9
Project Verification Process and Findings	10
Project Introduction.....	10
Site Description.....	10
Verifier's Methodology for Desk and In-Field Verification.....	10
Details of Confirmation for ACR Eligibility	11
Description and Discussion of Project Baseline	11
Data Supporting GHG Assertion:	11
Quantification Procedure and Results.....	12
Risk of Reversal	12
Corrective Actions Requested For Non-Compliance and Actions Undertaken By Project Owner	12



Verification Results.....	12
Conclusions on the GHG Assertion	13
ACR Verification Checklist.....	14
Project Proponent Authorization:.....	Error! Bookmark not defined.
APPENDIX A	24
APPENDIX B	25
APPENDIX C	26
APPENDIX D.....	29
APPENDIX E	31
APPENDIX F.....	32
APPENDIX G.....	33



Executive Summary

Environmental Services, Inc. (ESI) conducted an American Carbon Registry (ACR) initial (desktop and field) verification on behalf of GreenTrees, LLC. The verification included carbon sequestered in the 2009 vintage year for series A-1 and 2008-2009 vintage year for series GT. Series A-1 included 12 separate tracts in Arkansas and series GT included two separate tracts in Mississippi and one in Arkansas. The scope of the verification included the American Carbon Registry Forest Carbon Project Standard, March 2009 V1.

Authorization to proceed with verification was provided on 24 March 2010, and the verification took place between 12 April 2010 and 4 February 2011, with the opening meeting on 20 April 2010. The field portions of the verification took place on 20 April 2010 through 23 April 2010. The closing meeting took place on 7 February 2011.



Project Summary

Date:

28 February 2011

Compliance Years:

1 January 2008 – 31 December 2009 Series GT,

1 January 2009 – 31 December 2009 Series A-1

Verifier:

Environmental Services, Inc.

Lead Verifier – Shawn McMahon

Verification Team Member – Scott Sager

Verification Team Member – Richard Scharf

QA/QC – Janice McMahon

ACR Protocol:

American Carbon Registry Forest Carbon Project Standard, March 2009, V1.

Project Name:

GreenTrees Series GT and A-1

Project Owner:

GreenTrees, LLC.

Project Developer and/or Aggregator:

GreenTrees, LLC.

MRV Title and Date:

The GreenTrees Monitoring, Reporting and Verification Protocol: 7 January 2009

Included Forests:

Arkansas

- [REDACTED] 183.7 acres – 2009
- [REDACTED] 100.3 acres – 2009



- [REDACTED] 95.1 acres – 2009
- [REDACTED] 110.2 acres – 2008
- [REDACTED] 150.7 acres – 2009
- [REDACTED] 139.9 acres – 2009
- [REDACTED] 63.7 acres – 2009
- [REDACTED] 285.0 acres – 2009
- [REDACTED] 63.2 acres – 2009
- [REDACTED] 189.4 acres – 2009
- [REDACTED] 59.0 acres – 2009
- [REDACTED] 67.9 acres – 2009
- [REDACTED] 69.0 acres – 2009

Mississippi

- [REDACTED] 69.0 acres – 2008
- [REDACTED] 60.3 acres – 2008

Baseline (year and metric tons of CO₂e and ERTs):

2008 Planting Series GT

– Biomass Baseline 0

– Soil Baseline 40.4 MtCO₂e

2009 Planting Series A-1

– Biomass Baseline 0

– Soil Baseline (-) 138.3 MtCO₂e

ERTs Verified: 1,119.17 MtCO₂e (buffer not deducted)



Project Contact Information Including Roles and Responsibilities

Project Owner: GreenTrees, LLC.	Chandler Van Voorhis Managing Partner of C2I Office 540-687-8946 Chandler@c2invest.net
Project Developer and/or Aggregator: GreenTrees, LLC.	Chandler Van Voorhis Managing Partner of C2I Office 540-687-8946 Chandler@c2invest.net
ACR-Approved Verifier: Environmental Services, Inc.	Shawn McMahon Lead Verifier Office 330-833-9941 smcmahon@esinc.cc Scott Sager Verification Team Member Office 904-470-2200 ssager@esinc.cc Richard Scharf Verification Team Member Office 919-212-1760 rscharf@esinc.cc Janice McMahon QA/QC Office 330-833-9941 jmcmahon@esinc.cc

Scope of Verification Work

Our third-party verification procedure was implemented in accordance to ISO 14064-3:2006 and ISO 14065:2007, ESI's Management System, and in conjunction with the ACR's protocols and procedures. As required, the verification was conducted after defining and gaining approval from the client on the following seven items: Level of Assurance, Objectives, Criteria, Scope, Materiality, Handling of Records, and Client Statements Regarding Verification.

Level of Assurance: The level of assurance is used to determine the depth of detail that the verifier places in the verification plan to determine if there are any errors, omissions, or misrepresentations (ISO 14064-3:2006). For the ACR verifications, ESI selected samples of data and information to be verified to provide *reasonable assurance* and to meet the materiality requirements of the specific project type (*ACR Forest Carbon Project Standard, March 2009-v.1*).



Objective: For this project, the verification objective included an assessment of the likelihood that implementation of the planned GHG project would result in the GHG emission removal enhancements as stated by the project developer (ISO 14064-3:2006). The verification objective was to ensure the project was in compliance with *ACR Forest Carbon Project Standard, March 2009-v.1* criteria for afforestation projects (assessed the GHG emission removals).

Criteria: The criteria for the verification followed the verification guidance documents provided by ACR located at <http://www.americancarbonregistry.org/carbon-accounting/standards>. These documents include the:

- *ACR Offset Project Eligibility Criteria*
- *ACR Additionality Criteria*
- *ACR Technical Standard, Version 1.0, 2009*
- *ACR Forest Carbon Project Standard, Version 1.0, March 2009*

Scope: The scope of a verification, generally included the GHG project and baseline scenarios; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHG's; and time periods covered. The geographic verification scope was defined by the project boundary, which included aggregated parcels, the carbon reservoir types, management activities, growth and yield models, inventory program, and contract periods. The specific scope of this GreenTrees afforestation verification project was outlined by the project developer prior to the initiation of verification activities and is re-defined as follows for this is report:

Baseline Scenario	2008 Planting Series GT – Biomass Baseline 0 – Soil Baseline 40.4 MtCO ₂ e 2009 Planting Series A-1 – Biomass Baseline 0 – Soil Baseline (-)138.3 MtCO ₂ e
Activities/Technologies/Processes	Afforestation of bottomland hardwoods
Sources/sinks/Reservoirs	Live aboveground biomass, live belowground biomass, woody debris, soil carbon, and wood products
GHG Type	Carbon Dioxide (CO ₂)
Time Period	1 January 2008 – 31 December 2009 Series GT 1 January 2009 – 31 December 2009 Series A-1
Project Boundary	1,806.3 acres on multiple parcels in Arkansas and Mississippi

Materiality: Materiality is a concept that the individual or aggregation of errors, omissions, and misstatements could affect the GHG assertion and the decisions of the intended users. Materiality is also used as part of the verification sampling plan design, to determine the type of verification processes to be used by the verifier to minimize the risk of not detecting a material misstatement. The ACR's materiality threshold is +/-5% of the GHG project's emission reductions or removal enhancements.



Material misstatements involve inaccurate assertions of significance, relative to an offset project's GHG claimed emission reductions, that could reasonably be expected to influence decisions or actions taken by users of the reported GHG information. This can involve GHG emission reduction/removal claims, and any associated verification statement, due to individual or aggregation of errors or omissions.

Individual or aggregation of errors or omissions greater than the ACR materiality threshold of +/-5% require re-stating before verification statements can be accepted by ACR. Individual and aggregation of errors or omissions greater than +/-0.5%, but less than +/-5%, must be qualified in the verification statement, and are potentially subject to re-stating at the discretion of ACR prior to acceptance and registration.

Handling of Records: ESI shall keep all documents and verification-associated records in a secure retrievable manner for at least five years after the end of the project crediting period, even if ESI does not carry out the verifications for the whole project crediting period (ACR Eligibility Criteria). Records can be destroyed at any time, pending agreement between the client, ESI, and ACR. ESI shall maintain and manage records of its verification activities including:

- Application information and verification scopes
- Justification for how verification time is determined
- Confirmation of the completion of verification activities, including findings and information on material or non-material discrepancies
- Verification statements
- Records of complaints and appeals, and any subsequent correction or corrective actions

ESI shall maintain all verification records securely and confidentially, including during their transport, transmission or transfer. ESI shall retain verification records in accordance with any legal, contractual, and/or ACR requirements, per ISO 14065:2007, Sec. 7.5.

Client Statements Regarding Verification Status: It is the policy of Environmental Services, Inc. that the following statement be used by clients when the verification status (GHG Assertion) of the project is described:

The GreenTrees Series A-1 and Series GT project located in multiple parcels in Arkansas and Mississippi of approximately 1,806.3 acres has been verified by Environmental Services, Inc. to the appropriate standards as defined by the American Carbon Registry guidance documents and tools associated with afforestation projects. For a complete record of the attestation associated with this project verification, please contact Environmental Services, Inc.-Forestry, Carbon, and GHG Services Division at 904.470.2200 or forestry@esinc.cc and reference project number FV10004.00.

The statement may be used for a period of one (1) year after the completion of the project verification. Deviations from the statement provided above will be granted on a case-by-case basis, primarily when in conflict with formatting requirements or space limitations. These deviations will be reviewed by the Forestry, Carbon, and GHG Division Director, and substitute language agreed upon in writing.



Project Verification Process and Findings

Project Introduction

Environmental Services, Inc. (ESI) conducted an American Carbon Registry (ACR) initial (desktop and field) verification on behalf of GreenTrees, LLC. The verification included carbon sequestered through afforestation on 15 separate tracts, including 2009 vintage year for series A-1 and 2008-2009 vintage years for series GT. The scope of the verification of the afforestation project included the American Carbon Registry Forest Carbon Project Standard, March 2009 V1. The project asserts sequestration of 1,119.17 MtCO₂e for the 2008 and 2009 vintage years.

Site Description

The verification included carbon credits created on twelve tracts in series A-1 (2009 start date) and three tracts in series GT (2008 start date). The tracts enrolled included:

Arkansas:

- [REDACTED] 183.7 acres – 2009
- [REDACTED] 100.3 acres – 2009
- [REDACTED] 95.1 acres – 2009
- [REDACTED] 110.2 acres – 2008
- [REDACTED] 150.7 acres – 2009
- [REDACTED] 139.9 acres – 2009
- [REDACTED] 63.7 acres – 2009
- [REDACTED] 285.0 acres – 2009
- [REDACTED] 63.2 acres – 2009
- [REDACTED] 189.4 acres – 2009
- [REDACTED] 59.0 acres – 2009
- [REDACTED] 67.9 acres – 2009
- [REDACTED] 169.0 acres – 2009

Mississippi

- [REDACTED] 69.0 acres – 2008
- [REDACTED] 60.3 acres – 2008

The GreenTrees project consisted of inter-planting cottonwood cuttings at a density of 12 feet by 12 feet (302 stems per acre) with a like number (302 stems per acre) of bottomland hardwood seedlings, the species varying based upon the specific soil and moisture situation of the site. GreenTrees require that land be in non-forest use continuously since 1989, and land was in crop or grassland use. Each landowner either conducts all planting and management activities personally or contracts with independent forestry consultants.

Verifier's Methodology for Desk and In-Field Verification

The verification sampling plan methodology was derived from all items in our verification process previously described. Specifically, the sampling plan was structured to address all requirements of the ACR Forest Carbon Project Standard, March 2009-v.1, based on the project parameters (acreage and pooled participants). Stands selected for verification were at the discretion of the verifier. For this project,



the target sample size for both the field and desktop was 50% of total enrolled acreage in the pool. The parcels sampled in the field included:

-
-
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-



Age, planting density, species mix, and acreage were assessed for each parcel through a visual on-site review. Planting density and inherent population variability were assessed through the installation of sufficient fixed-area plots, randomly located, to provide reasonable assurance.

Authorization to proceed with verification was provided on 24 March 2010, and the verification took place between 12 April 2010 and 4 February 2011, with the field portions of the verification on 20 April 2010 through 23 April 2010. The closing meeting took place on 7 February 2011.

Details of Confirmation for ACR Eligibility

The scope of the verification of the afforestation project included the American Carbon Registry Forest Carbon Project Standard, March 2009 V1. Approval of the GreenTrees MRV was provided by ACR on 8 January 2010 and can be found in Appendix A. The carbon pools covered in this verification included live aboveground biomass, live belowground biomass, woody debris, and soil carbon. The project asserts sequestration of 1,119.17 MtCO₂e for the 2008 and 2009 vintage years.

Description and Discussion of Project Baseline

As provided for Chapter 6.3 of the ACR approved GreenTrees MRV, the baseline for biomass is reported as zero for all lands previously in annual crops, grass, or pasture. GreenTrees has demonstrated through records, affidavits, and historical imagery that all lands currently enrolled were formerly cropland, grass, or pasture, and accordingly the baseline for biomass is zero. For soils, the baseline was determined through modeling of soil carbon utilizing CometVR. This is a deviation from the GreenTrees MRV, however deviation from the MRV was approved by ACR and the new approach is consistent with ACR requirements.

Data Supporting GHG Assertion:

The primary quantitative data supporting the GHG assertion included direct sampling of soil and biomass carbon and the use of modeling. Additional data was also utilized to support the GHG assertion, including, but not limited to, the GreenTrees MRV, land use trends in the region, maps, and published articles and journals.



Quantification Procedure and Results

For a full description of the processes employed by GreenTrees to calculate carbon sequestered by the project, please refer to the GreenTrees MRV, 7 January 2010, and the deviations as stated in this verification report.

Risk of Reversal

Risk of reversal was assessed utilizing the “Tool for AFOLU Non-permanence Risk Analysis and Buffer Determination” approved by ACR. The risk of reversal analysis was assessed by ESI and determined to be thorough and appropriate. The buffer determination was conducted separately by ACR. A statement to this affect was provided from ACR by email, which can be found in Appendix B.

Corrective Actions Requested For Non-Compliance and Actions Undertaken By Project Owner

Clarification was required from GreenTrees and ACR on several items which required revision of GreenTrees submittal in some instances. These included a demonstration that all emissions are *de minimus* under the IPCC tier one methods, demonstration of seedling purchase and plantings records, and clarification of title record demonstration.

Additionally, there were several issues which required revision of carbon calculations for both biomass and soils. These included adjustments to biomass equations to address conversion between species, acreage discrepancies, mis-referenced cells, and revisions to statistics. A comprehensive list of questions and associated clarifications/adjustments to the calculations is attached for reference in Appendix C.

ACR also interceded to provide guidance and approval on several items. Many of these issues centered on variations between what was implemented in the project and what was stated in the approved MRV. This included the MRV’s requirement of “environmental additionality” for enrolled properties, the MRV requirement that landowners provide an attestation that no obligation exists to reforest the project, and the MRV requirement that all properties currently under a mortgage must obtain a subordination agreement from the mortgage holder. To address variations from the MRV, ACR issued a statement that ESI was not required to verify to the MRV, but to the ACR standard alone (Appendix D). Guidance was also provided by ACR to address ESI’s concern about the R-squared value for the regression equation used to estimate height based on diameter (Appendix E). ACR also stated that they have coordinated with GreenTrees on how the buffer contribution will be addressed (Appendix B). Additionally, on two sites with little to no tree survival GreenTrees requested and received approval from ACR (Appendix F) to add only the soils component until supplemental plantings could occur. Finally, Nick Martin with ACR granted verbal conditional approval for ESI to prepare a preliminary conditional verification statement in order for GreenTrees to meet an internal deadline (Appendix G).

Verification Results

The verifier confirms that the latest submittal on 18 January 2011 from GreenTrees complies with the *ACR Technical Standard, Version 1.0, 2009*, the *ACR Forest Carbon Project Standard, Version 1.0, March 2009*, and all other applicable ACR criteria, as modified/interpreted by ACR staff.



Conclusions on the GHG Assertion

The GreenTrees Series A-1 and Series GT project located in multiple parcels in Arkansas and Mississippi of approximately 1,806.3 acres has been verified by Environmental Services, Inc. to the appropriate standards as defined by the American Carbon Registry guidance documents and tools associated with afforestation, as interpreted and defined by ACR staff.



ACR Verification Checklist

Eligibility

Criteria	Definition	Requirement	Does Project Meet Standard	Verifier Comments
Project Document (pg 18 of ACR standard)	<p>A project document (PD) defines how, what, and when a project proponent shall measure, monitor, and report the project in order for an independent third party to verify project outcomes</p> <p>The PD is either a GHG Project Plan or a MRV Project Protocol, depending on whether the project uses an existing and/or Registry-approved methodology within a sector standard, or a new methodology for a new project type that is not under an existing sector standard.</p>	<p>The Registry requires a GHG Project Plan for projects using existing and Registry-approved tools and methodologies, and based on an existing Registry sector standard, as applicable.</p> <p>The Registry requires a MRV Project Protocol for projects using a new methodology and/or tool (but validated by the Registry) and not based on a Registry sector standard, as applicable.</p> <p>All PDs shall address each of the following eligibility criteria in this table, and in accordance with ISO14064-2:2006, Clause 5.2</p>	Yes	ACR provided assurance that the GreenTrees MRV met all applicable ACR requirements
Start Date (pg 19 of ACR standard)	<p>The Registry defines the start date for forest projects as the date by which the Project Proponent began the project activity on project lands.</p>	<p>The Registry accepts forest projects with a Start Date no earlier than 01 January 1990. The Registry will evaluate forest project start dates on a case-by-case basis based on the original intent of the project.</p> <p>Start date definitions per project type are: AR project start is when the Project Proponent began planting; IFM project start date is when the Project Proponent began to apply the land management regime; REDD is when the Project Proponent implemented the project-action</p>	Yes	As stated in Chapter 3 of the GreenTrees MRV, the earliest start date for any of the project pools is 18 February 2008 (1 st planting)



		physically and/or legally.		
Real (pg 19 of ACR standard)	A real project-based offset is the result of a project action that yields after-the-fact, quantifiable and verifiable GHG emissions reductions/removals. Real offsets yield atmospheric benefit.	Offsets shall exist prior to issuance. The Registry will not forward issue nor forward register a projected stream of future offsets.	Yes	This verification covers only the carbon sequestered by the project through 31 December 2009. The project currently proposes to directly measure carbon stocks annually, with no forward modeling of growth.
Direct Emissions (pg 19 of ACR standard)	An emission or removal is a "direct emission" if the Project Proponent owns or has control over the source of the emissions (e.g., equipment) or the emissions sink (e.g., project lands).	Project Proponent shall own or have control for the life-of-project over the GHG sources and/or sinks from which the reduction or removals originate.	Yes	The project proponent has included sufficient language within their landowner contracts to ensure control for the life of the project over the sinks from which the GHG removals are generated. This is further supported through title opinions and subordination agreements.
Additional (pg 19 of ACR standard)	Additionality is a test intended to ensure that project offsets are "in addition to" reductions and removals that would have occurred without carbon market incentives.	Every project shall pass through a test of the project's additionality along three dimensions: 1) projects must meet or exceed regulatory requirements; 2) go beyond common practice; and 3) overcome implementation barriers (institutional, financial or technical)	Yes	As provided for in chapter 4 of the GreenTrees MRV, the project proponent has demonstrated that all three additionality dimensions have been satisfied.
Offset Title (pg 20 of ACR standard)	Title is a legal term representing rights and interests in an offset, a future stream of offsets, or a project delivering offsets.	Project Proponent shall provide documentation and attestation of undisputed title to all offsets prior to registration. Title to offsets shall be clear, unique, and uncontested.	Yes	The project proponent has provided sufficient documentation (landowner contracts, deeds, title opinions, subordination agreements, maps, etc.) demonstrating clear and undisputed title of the offsets.
Land Title (pg 20 of ACR standard)	Title is a legal term representing rights and interests in project lands.	Project Proponent shall provide documentation and attestation of undisputed land ownership to all project lands.	Yes	The project proponent has provided sufficient documentation demonstrating clear and undisputed title of the offsets by all lands enrolled in the project through a combination of deeds, title opinions, subordination



				agreements from institutions holding mortgages and formal statements from the landowners.
Project Baseline (pg 20 of ACR standard)	The project baseline is a counterfactual scenario that forecasts the likely stream of reductions/removals to occur if the project Proponent does not implement the project, i.e., the "business as usual" case.	<p>Project Proponent shall use appropriate tools and methodologies to estimate and update forest project baselines.</p> <p>Project Proponents shall estimate the baseline for all forest projects at the project start. Baseline will be verified by a Registry-approved verifier at time of offset issuance.</p> <p>At the time of project verification, verifiers shall review and verify that the minimum project contribution to the Registry buffer pool is valid.</p>	Yes	<p>As provided for in Chapter 6.3.1 of the MRV, for all lands enrolled that were previously under annual crop management, grass, or pasture, the baseline for biomass carbon stock was set to zero. The annual cropland/grass/pasture designations were demonstrated through historic photos, records, and affidavits from landowners.</p> <p>The soils baseline was determined by GreenTrees through in field sampling of all project sites, using the methodology outlined in Chapter 7 of the GreenTrees MRV. The soil sampling and analysis methodology was reviewed by ESI was and found to be appropriate. A selection of soil sampling locations was also verified in the field.</p>
Permanence (pg 20 of ACR standard)	Permanence is in reference to the longevity of terrestrial carbon stocks, i.e., carbon that is stored (sequestered) in biomass. Fire, disease, pests, and human disturbances can reduce carbon stocks and result in the reversal of carbon removal, i.e., the atmospheric benefit is not permanent. In such	Project Proponents shall identify, assess, and address in the PD the risk of the reversal by using Registry-approved methodologies and tools (e.g., the VCS permanence risk assessment and buffer determination tool). Relative risk of reversal will determine buffer values, and therefore contribution to the Registry buffer pool. Alternatively Project Proponents shall provide evidence of sufficient insurance coverage to recover any future reversal.	Yes	Risk of reversal was assessed utilizing the "Tool for AFOLU Non-permanence Risk Analysis and Buffer Determination" approved by ACR. The risk of reversal analysis was assessed by ESI and determined to be thorough and appropriate. The buffer determination was conducted separately by ACR. A statement to this affect was provided from ACR in an email,



	a case, the offset is not permanent, thus the need to address non-permanence and mitigate reversal risk.	<i>The Registry reserves the right to reject the risk assessment method and findings either at the time of project screening or verification acceptance.</i>		which can be found in Appendix B.
Carbon Buffer pool (pg 21 of ACR standard)	A buffer pool is a type of risk management mechanism whereby the Project Proponent maintains a reserve of project-based offsets in order to mitigate reversal risk by having the capacity to replace unforeseen losses in carbon stocks.	<p>Project proponents shall participate in the Registry buffer pool unless the option to maintain insurance coverage is selected.</p> <p>Project Proponents shall use the “Tool for AFOLU Non-Permanence Risk Analysis and Buffer Determination” in order to address risk permanence and buffer determination.</p> <p>The offsets held in the buffer pool shall be under the management and sole control of the Registry.</p> <p>Project Proponents shall undergo every five (5) years, counting from the first project verification, a review by an independent verifier of the minimum project buffer values to ensure that a positive, safe, and balanced buffer pool exists for the project at all times.</p>	Yes	ACR has provided a statement that they have coordinated with GreenTrees on how the reversal risk buffer contribution will be addressed (Appendix B). This is further supported by Chapter 3.3 of the MRV which outlines how the buffer was determined and again in Chapter 3 Introduction, which states GreenTrees has implemented a 70 year lease contract.
Leakage Controlled (pg 21 of ACR standard)	Leakage is the increase in GHG emissions outside the project emissions boundaries that occurs because of the project action.	<p>Project Proponents shall include leakage in the GHG Project Plan or MRV Project Protocol, and shall deduct all leakage that reduces the GHG emissions reduction/removal benefit of the project.</p> <p>The Registry assesses leakage on a case-by-case basis.</p>	Yes	As addressed in Chapter 6.2 of the MRV, GreenTrees has sufficiently demonstrated that leakage has been considered and addressed.
Crediting Period (page 21 of ACR standard)	Crediting period is the finite length of time for which the project baseline is valid, and during which a project can generate offsets for registration in the Registry.	<p>AR projects will have a crediting period of thirty-five (35) years or less, with opportunities for baselines validation renewal. IFM and REDD projects will have a crediting period of ten (10) years or less, with opportunities for validation renewal.</p> <p>Project Proponents shall use</p>	Yes	GreenTrees program has committed to the 35 year crediting period as required for AR projects.



		<p>the current baseline methods and factors that are in effect with Registry-approved tools and methodologies at the time of crediting period renewal.</p> <p>If the independent verifier does not issue a positive baseline validation after thirty-five (35) years for AR projects, and ten (10) years for IFM and REDD, it will provide a written explanation and list correction actions for the Project Proponent to take within a specified timeframe at the discretion of the Registry.</p> <p>If the Registry determines at any time that there is no longer regulatory surplus, the Registry reserves the right to nullify the crediting period and no longer issue offsets from the project.</p>		
Independent Verification (pg 22 of ARC standard)	Verification is the independent assessment of GHG emissions reduction and removal by a qualified third party. The outcome is a verification statement that provides an opinion on the relevance, completeness, accuracy, reliability, and transparency of the quantification data and methods.	<p>The Registry requires independent verification, as scheduled in the project's GHG Project Plan or MRV Project Protocol by a Registry-approved verifier.</p> <p>Verifiers shall use transparent and replicable verification methods against relevant Registry project eligibility criteria and forest sector standard.</p> <p><i>The Registry reserves the right to reject a verification statement from a Registry-approved verifier.</i></p>	Yes	GreenTrees contracted ESI to undertake the verifications for 2008 and 2009. ESI is an independent ACR approved and ANSI accredited verifier.
Community & Environmental Integrity (pg 23 of ACR standard)	Projects have the potential to generate both positive and negative community and environmental impacts.	<p>Project Proponents shall take steps to mitigate negative community and environmental impacts prior to registration.</p> <p>Project Proponent shall provide the Registry an Annual Qualitative Review and Attestation statement of any claims that arise during the project about negative community and environmental</p>	Yes	As demonstrated in Chapter 5.5 and 5.6 of the MRV, GreenTrees has demonstrated that the ecological, social and economic benefits and impacts have been considered and sufficiently addressed.



		<p>impacts.</p> <p>If impacts arise during project implementation, Project Proponents shall report them to the Registry, and mitigate negative impacts prior to Registry issuance of new reductions/removals from the project.</p> <p><i>The Registry reserves the right to remove offsets from the Registry on a case-by-case basis.</i></p>		
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Accounting Concepts

Criteria	Definition	Does Project Meet Standard	Verifier Comments
Forest Carbon Project (pg 25 of ACR standard)	A forest carbon project is a defined project action, or set of actions, to reduce greenhouse gas (GHG) emissions/remove GHGs from the atmosphere by conserving and/or increasing forest carbon stocks in a defined geographic area.	Yes	The GreenTrees project has demonstrated active reduction of GHG emissions through an increase in forest carbon stocks.
GHG Emissions Accounting (pg 25 of ACR standard)	Project Proponents shall account for any significant source of GHGs in the GHG Project Plan/MRV Project Protocol (a.k.a. the Project Document or PD) by using Best Practice accounting methods. The Registry affirms a set of guiding principles that shape its work in the U.S. carbon markets and carbon markets internationally. Clause 3 in the ISO 14064-2:2006 Standard is the basis for the American Carbon Registry's project-level accounting requirements, and the GHG Protocol, Corporate Inventory Guidance (2005) is the basis for the GHG inventory accounting principles.	Yes	The GreenTrees project has accounted for all significant sources of GHG's in the MRV.
Project Baseline (pg 25 of ACR standard)	The baseline scenario is a long-term projection of the forest management practices or activities that would have occurred (or the absence thereof) within the project's physical boundaries in the absence of the project. The project baseline is a counterfactual scenario that depicts the likely stream of emissions or removals expected to occur if the Project Proponent does not implement the project. Change in carbon stocks or emissions of GHGs over time relative to the baseline is the basis for GHG reductions and removals. The quantity of offsets that a project generates is the difference between actual emissions or removals and the baseline emissions or	Yes	As provided for in Chapter 6.3.1 of the MRV, for all lands enrolled that were previously under annual crop management, grass or pasture, the baseline for biomass carbon stock was set to zero. The annual cropland/grass/pasture designations were demonstrated through historic photos, records, and affidavits from



	removals resulting from the project action.		landowners. The soils baseline was determined by GreenTrees through the CometVR model. The COMET-VR projections result in an estimated net baseline emission of 98 MtCO ₂ e for both project years combined (40.4 MtCO ₂ e for 2008 and -138.3 MtCO ₂ e for 2009). Conservatively, GreenTrees is not claiming these avoided emissions.
Measurement Accuracy and Precision (pg 26 of ACR standard)	The American Carbon Registry requires that the 90% statistical confidence interval of sampling be no more than 10% of the mean estimated amount of emission reduction/removal. If the Project Proponent cannot meet the targeted +/- 10% of the mean at 90% confidence, then the reportable amount shall be the mean minus the lower bound of the 90% confidence interval.	Yes	GreenTrees has demonstrated that they meet the required 90% statistical confidence interval of sapling with less than 10% of the mean estimated amount of emission removals. The pooled mean for both soil and biomass was 7.8%.
Completeness (pg 26 of ACR standard)	Project Proponents shall, including estimating and accounting for any decreases in carbon pools and/or increases in GHG emission sources. If a project action increases use of inputs, Project Proponents shall count as project emissions expected emissions from production of those inputs. Project Proponents should not count downstream emissions, except for non-economic downstream emissions. For example, vehicles emit oxides of nitrogen and some of these oxides become nitrous oxide in the atmosphere. Project Proponents shall not count emissions involved in economic uses of project outputs (unless the economic uses are a direct component of the project activities). For example, if a project grows grain then sells it, and the grain buyer then feeds the grain to cattle, the Project Proponent would not estimate and count as project emissions the methane emissions from the cattle.	Yes	As addressed throughout the MRV, GreenTrees has considered all relevant information that may affect the accounting and quantification of GHG reductions/removals.
Leakage (pg 26 of ACR standard) Also see Table at pg	Leakage is the displacement of GHG emissions from inside the project's physical boundaries to locations outside of the project's boundaries as a result of the project action. Leakage includes the carbon in wood that a	Yes	As addressed in Chapter 6.2 of the MRV, GreenTrees has sufficiently addressed leakage from all



27 of ACR standard)	forest entity removes from project lands and subsequently stores in harvested wood products. The Registry will register only those offsets from forest projects that account for leakage in the GHG Project Plan or MRV Project Protocol pursuant to this standard and based on CDM and VCS methodologies as appropriate. All Project Proponents shall address the requirements in Table 2 in the GHG Project Plan or MRV Project Protocol.		required sources.
Permanence (pg 27 of ACR standard)	<p>Permanence is a reference to the longevity of terrestrial carbon stocks. Events such as forest fire, disease, pests, and illegal logging can harm carbon stocks and result in the reversal of carbon reduction/removal, i.e., the atmospheric benefit is not permanent. Project Proponents shall identify, assess, and address permanence by a Registry-approved mechanism. Project Proponents have the option to use of one of the following to address the risk of reversal:</p> <ul style="list-style-type: none"> Project contributions of offsets to the Registry buffer pool; Insurance policy guaranteeing replacement price for offsets; Donated, non-forest offsets that meet the Registry Standards. 	Yes	Risk of reversal was assessed utilizing the "Tool for AFOLU Non-permanence Risk Analysis and Buffer Determination" approved by ACR. The risk of reversal analysis was assessed by ESI and determined to be thorough and appropriate. The buffer determination was conducted separately by ACR. A statement to this affect was provided from ACR in an email, which can be found in Appendix B.
Buffer (pg 27 of ACR standard)	To address risk of reversal, the Registry uses a buffer, i.e., a contribution of an adequate number and type of offsets, as determined by the American Carbon Registry, to a buffer pool to cover any future reversals. Buffer size is determined through a risk assessment completed by the verifier and the Registry.	Yes	ACR has provided a statement that they have coordinated with GreenTrees on how the reversal risk buffer contribution will be addressed (Appendix B).
Socioeconomic and Environmental Impacts (pg 28 of ACR standard)	Projects have the potential to generate socioeconomic and environmental impacts, including impact on the integrity of existing forests, biodiversity, clean water, poverty alleviation, and respect for the rights of indigenous peoples and other local communities. 1 The Registry requires written disclosure in the Annual Qualitative Review of any claims that arise during the project about negative environmental and socio-economic impacts. Project Proponents shall take steps to mitigate them prior to generation of emissions reductions and removals. The Registry reserves the right to remove offsets from the Registry on a case-by-case basis.	Yes	As demonstrated in Chapter 5.5 and 5.6 of the MRV, GreenTrees has demonstrated that the ecological, social and economic benefits and impacts have been considered and sufficiently addressed.
Biomass Energy (pg 28 of ACR standard)	Over time, GHG emission reductions from displacement of fossil fuel could make a net GHG benefit for a project, even if	n/a	The GreenTrees project had no displacement for fossil fuels nor any



	displacement of fossil fuel reduces terrestrial carbons stocks temporarily. Project Proponents must calculate GHG emissions from displaced fossil fuel by using energy project protocols. If biomass energy projects reduce terrestrial carbon stocks, Project Proponents must count these reductions as project emissions. Project Proponents may calculate terrestrial carbon stock change over periods of up to ten (10) years. That is, a Project Proponent does not need to count as a project emission in year one (1) the removal of biomass for fuel if the biomass carbon stock returns to at least the original stock by the end of year ten (10).		removals of biomass for fuel.
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SMM/rmb/FV10004.00 Final Report.doc
K: pf 2/28/11f



Project Proponent Authorization:

I, GreenTrees, LLC (ACR Project Develop), authorize the above-named
verifier to submit this Verification Evaluation to the American Carbon Registry.

Chandler Van Voorhis, managing member
Member Representative (Print Name)

[Signature] managing member
Member Representative (Signature)

02/28/11
Date (mm/dd/yy)



APPENDIX A



January 8, 2010

Chandler Van Voorhis
Managing Partner, C2I
P.O. Box 193
Middleburg, VA 20118

Dear Chandler,

Thank you for your final revisions to *The GreenTrees Monitoring, Reporting and Verification Protocol: an Advanced Carbon Restored Ecosystem (ACRE) Approach for the Delta*. We appreciate your thoroughness in responding to these and earlier requests.

The American Carbon Registry has reviewed and approves this MRV Protocol for Series A-1 of the GreenTrees project. Please proceed with your verification using a Registry-approved third-party verifier. Pending a positive verification report, the Registry expects to issue ERTs to this project.

We appreciate the chance to work with you on this excellent project and look forward to your future planting series. Thank you and please do not hesitate to contact me with further questions.

Sincerely,

Nicholas Martin
Chief Technical Officer, American Carbon Registry



APPENDIX B

Shawn McMahon

From: Martin, Nick [NMartin@WINROCK.ORG]
Sent: Thursday, May 13, 2010 6:21 PM
To: Shawn McMahon
Cc: Nichols, Lauren; Grady, Mary; Janice McMahon
Subject: RE: GreenTrees Verification

Shawn,

Yes, I think that's correct and reflects what we agreed with C2I. Because of when they began preparing and ultimately early-registered the project, GreenTrees is held to *ACR Technical Standard v1.0* and *ACR Forest Carbon Project Standard v1.0* (not 2.0).

The basic project eligibility requirements and additionality demonstration are unchanged between the *ACR Technical Standard V1.0* and *ACR Standard v2.0*. The *ACR Standard* just has a lot more detail.

Crediting period for afforestation/reforestation will be different in v2.0 of the forest standard, but it's 35 years in both the *Forest Standard v1.0* and *ACR Technical Standard*.

The one area where I think you may find insufficient guidance is on reversal risk mitigation / buffer contribution. That's why we have given so much more guidance in v2.0; however, this project predates that. We've agreed with C2I how the buffer contribution will be dealt with for GreenTrees series A.

Thanks
Nick

Nicholas Martin Chief Technical Officer

American Carbon Registry, an enterprise of Winrock International

office 703.842.9500 | cell 651.233.3385 | fax 703.842.9500 | e-mail nmartin@winrock.org

2121 Crystal Drive, Suite 500 | Arlington, VA 22202, USA | www.winrock.org | www.americancarbonregistry.org





APPENDIX C

GreenTrees ACR Verification Project Timeline

Date	Entity	Action	Issue	Result
3/24/2010	ESI/ GreenTrees	ESI contracted to conduct verification.		
4/12/2010	GreenTrees	Initial data received from GreenTrees		
4/20/2010	ESI/ GreenTrees	Opening meeting.		
4/21/2010 - 4/23/2010	ESI/ GreenTrees	Field verification.		
4/23/2010	ESI	Requests biomass data.		
5/7/2010	GreenTrees	GreenTrees sends biomass data without formulas or statistics.	Biomass data sent without formulas or statistics	Data received.
5/18/2010	GreenTrees	GreenTrees sends biomass data with statistics but no formulas.		
5/21/2010	GreenTrees	GreenTrees sends biomass data with formulas.		Biomass formulas received
6/14/2010	ESI	ESI requests clarifications on conversion factors.	Errors with conversions factor between <i>Populus tremuloides</i> and <i>P. deltoides</i>	
6/14/2010	GreenTrees	Revised biomass spreadsheet (version analyzed 9d) with correction to conversion. Soils data also sent.		Conversion factor addressed
6/15/2010	ESI	ESI requests clarifications on revised biomass spreadsheet (version analyzed 9f).	Concerns about DBA r2 - request clarification	
6/15/2010	ACR	ACR approves GreenTrees r2 value		r2 Issue addressed
6/15/2010	GreenTrees	Revised biomass spreadsheet received (version analyzed 9c). Spreadsheet does not include sources for formulas.	Formula sources not provided	
6/15/2010	GreenTrees	GreenTrees sends email stating version analyzed 9c underestimated volume.		
6/17/2010	ESI	ESI states GreenTrees can use their preferred alternate version if sources can be verified for formulas.		
6/24/2010	ACR	ACR issues approval for ESI to provide a verification statement contingent upon outstanding issues.		
6/28/2010	GreenTrees	GreenTrees provides sources for formulas for version analyzed 9c.		Formula sources provided
6/29/2010	ESI	ESI provides contingent verification statement, pending outstanding issues.		
7/7/2010	ESI	ESI requests clarification on apparent error in soils spreadsheet.	Error in soils spreadsheet resulting in addition of 160 tons CO2e.	
7/13/2010	GreenTrees	GreenTrees provides revised soils spreadsheet to correct error, demonstrating that the errors did not affect volume.		Soils spreadsheet error corrected.
7/15/2010	ESI	ESI requests clarification on latest version of biomass statistics.	GreenTrees and ESI statistics do not agree.	
7/26/2010	GreenTrees	GreenTrees sends revised spreadsheet with corrected statistics re-run to reflect changes made to correct previous errors.		
7/27/2010	ESI	ESI requests clarification on latest version of biomass and statistics.	Errors to statistics; some plots are missing in each stratum.	
7/27/2010	GreenTrees	GreenTrees sends revised spreadsheet with corrected statistics to add missing plots.		
7/29/2010	ESI	ESI requests clarification on latest version of biomass and statistics.	Apparent acreage discrepancies in biomass spreadsheet.	



GreenTrees ACR Verification Project Timeline

Date	Entity	Action	Issue	Result
8/3/2010	GreenTrees	GreenTrees provides explanation of acreage discrepancy.	ESI had referenced the incorrect cells.	Acreage discrepancy addressed.
8/6/2010	ESI	ESI requests meeting with GreenTrees to discuss how error is pooled.	Clarification needed on stratum and project level pooling of statistics.	
8/16/2010	GreenTrees	GreenTrees provides new biomass statistics using a published methodology and explains project level pooling method.		
8/18/2010	ESI	ESI requests clarification on latest version of spreadsheet.	Misreferenced cell's in new spreadsheet resulting in an incorrect acreage. Additionally, spreadsheet is linked to another spreadsheet we do not have access to.	
8/18/2010	GreenTrees	GreenTrees provides updated spreadsheet (analyzed 9e) which corrects acreage error (misreferenced cell) and removes link to external spreadsheet.		Acreage issue and spreadsheet link issue are addressed.
8/18/2010	ESI	ESI requests clarification on latest version of spreadsheet.	New spreadsheet does not appear to include 2008 volumes for soils. Additionally, uncertainty appears incorrect - possibly the result of formatting error (taking a percentage of a percentage).	
8/18/2010	GreenTrees	GreenTrees provides updated spreadsheet (analyzed 9f) which corrects the exclusion of 2008 soils volumes and corrects the uncertainty formatting error.		2008 soil volume and uncertainty error issues are addressed.
8/19/2010	ESI			All issues with biomass calculations have been addressed to the satisfaction of the verification body.
9/9/2010	ESI	ESI requests clarification on soil baseline information.	Have not received soil baseline.	
9/19/2010	GreenTrees	GreenTrees provides soil baseline date.		
9/16/2010	ESI	ESI requests clarification on sub sampling of dry weights.	Half of samples did not have dry weights.	
9/27/2010	ESI/ GreenTrees	ESI has discussion with Bob Misso about field sampling dry weights.	Confirmed that dry weights not collected for all soil samples.	
9/28/2010	ESI	ESI requests further clarification on how GreenTrees can address missing soil data.		
10/8/2010	GreenTrees	GreenTrees provides proposal to address missing soil data.	Proposes to utilize a single bulk density factor.	
10/15/2010	ESI	ESI requests approval from ACR for the deviation (postponement of soil baseline establishment and single bulk density factor).	ACR standard requires initial establishment of baseline; new approach would be a deviation.	
10/26/2010	ACR	ACR approves single bulk density factor, but not postponement of soil baseline establishment.		Bulk density approved, postponement now approved.
11/1/2010	GreenTrees	GreenTrees proposes establishment of soil baseline utilizing CometVR and provides soil baseline and statistics.		
11/4/2010	ESI	ESI approves proposal to establish soil baseline utilizing CometVR.		New baseline approach approved.



GreenTrees ACR Verification Project Timeline

Date	Entity	Action	Issue	Result
11/11/2010	ESI	ESI provides questions to GreenTrees on new baseline.	Statistics were not updated, unknown uncertainties produced by CometVR for some sites, general questions on implementation of new approach, Greentrees proposal to be credited for declining baseline stock (avoided emissions).	
11/15/2010	GreenTrees	GreenTrees agrees to conservatively not claim avoided baseline emissions.		Avoided emissions in baseline issue addressed.
1/6/2011	GreenTrees	GreenTrees provides responses to questions from 11/11/2010.		
1/12/2011	ESI	ESI requests the CometVR outputs from which GreenTrees responses were derived.	Could not reproduce GreenTrees CometVR outputs/statistics.	
1/18/2011	GreenTrees	GreenTrees provides all requested CometVR outputs.		
1/26/2011	ESI	ESI reviewed and approved CometVR outputs and statistics.		Soils baseline approved.
2/7/2011	ESI/ GreenTrees	Closing meeting.		



APPENDIX D

From: [Chandler Van Voorhis](#)
To: [Shawn McMahon](#)
Cc: [Kathy Stewart](#); [Gordon Smith](#); [Bob Misso](#)
Subject: Fwd: guidance
Date: Monday, June 07, 2010 10:01:44 PM

Shawn:

Please see Nick Martin's email below as it concerns issues where there are deviations between the MRV and ACR Standard 1.0. I hope this guidance provides clarification to a number of the outstanding questions. I will be traveling tomorrow but available by cell, so feel free to reach me.

Thanks and all the best,
Chandler

Chandler Van Voorhis | Managing Partner of C2I | Office 540-687-8946 | Cell 540-497-1585 |
www.c2invest.net | www.green-trees.com | www.americanbiomassenergy.com

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Begin forwarded message:

From: "Martin, Nick" <NMartin@WINROCK.ORG>
Date: June 7, 2010 9:51:02 PM EDT
To: Chandler Van Voorhis <Chandler@c2invest.net>
Subject: RE: guidance

Chandler,

In general, ESI should be verifying against the *ACR Standard* and *ACR Forest Carbon Project Standard v1.0* (not v2.0 obviously, since that was only released last week). I discussed this a little with Scott Sager of ESI, whom I met in Florida. If there are things in the approved MRV Protocol that in fact require more than the *ACR Standard* and *ACR Forest Carbon Project Standard v1.0* require, ESI need only verify against the standards. The fact that we approved the MRV Protocol does not mean we require adherence to every word in that, as long as there is adherence to the standards.

I am happy to answer this question with regard to a list of specific questions, as well, if you would like.

Thanks
Nick



Nicholas Martin Chief Technical Officer
American Carbon Registry, an enterprise of Winrock International
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www.americancarbonregistry.org
office 703.842.9500 | cell 651.233.3385 | fax 703.842.9500 | e-mail nmartin@winrock.org

From: Chandler Van Voorhis [<mailto:Chandler@c2invest.net>]
Sent: Monday, June 07, 2010 3:07 PM
To: Martin, Nick
Subject: guidance

Nick:

During the course of the verification process, ESI has found a few situations where the ACR standard does not require something but the MRV states it would perform the activity. For example, ACR does not require attestation from landowners, but the MRV says we will get it. On issues such as these, should ESI be verifying to MRV or ACR Standard?

Chandler Van Voorhis | Managing Partner of C2I | Office 540-687-8946 | Cell 540-497-1585 | www.c2invest.net | www.green-trees.com |
www.americanbiomassenergy.com

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APPENDIX E

From: [Martin, Nick](#)
To: [Shawn McMahon](#)
Cc: [Scott Sager](#); chandler@c2invest.net; gsmith@ecofo.org; [Grady, Mary](#)
Subject: RE: GreenTrees Question
Date: Tuesday, June 15, 2010 8:27:51 PM
Attachments: [image001.png](#)

Dear Shawn,

I am on a family vacation but have just read the e-mails and reviewed the approach GreenTrees is using to establish a relationship between DBA and height of one-year-old trees.

I find the approach consistent with the ACR *Forest Carbon Project Standard v1.0*, the *ACR Standard*, and broadly consistent -- though I understand the issue was not addressed explicitly there -- with chapter 8 of the GreenTrees MRV Protocol that we certified. As you know from our standards and the pre-final *ACR Verification Guideline* we shared with you, ACR generally prescribes a high-level target (e.g. precision of +/- 10% of the mean with 90% confidence, applied to the final calculation of emission reductions/removals) and requires a conservative approach be used. By design we do not prescribe things at the level of minimum r2 values for individual carbon pools. Nothing in the approach GreenTrees is proposing suggests to me that it is likely to lead to a material discrepancy or to an overestimate in the final calculation of emission reductions/removals.

If you believe the approach for these small trees or the relatively low r2 pose the risk of a material discrepancy as defined by ACR, then you should discuss this further with GreenTrees and if needed with us. Otherwise, we do not have a problem with the approach.

Thanks,
Nick

Nicholas Martin
Chief Technical Officer, American Carbon Registry
Winrock International
Tel (703) 842-9500
Mobile (651) 233-3385
nmartin@winrock.org
nmartin@americancarbonregistry.org

From: Shawn McMahon [<mailto:smcmahon@ESINC.CC>]
Sent: Tue 6/15/2010 1:17 PM
To: Martin, Nick
Cc: Scott Sager
Subject: RE: GreenTrees Question

Nick,

Are you available to talk about GreenTrees sometime today? We have an issue with the r2 of one of their biomass models which will be much easier to speak about in person, rather than over email. Much appreciated.

Best,



APPENDIX F

From: Martin, Nick [mailto:NMartin@WINROCK.ORG]
Sent: Tuesday, June 15, 2010 10:17 AM
To: Shawn McMahon
Cc: Scott Sager
Subject: RE: GreenTrees Question

Shawn,

Thanks for the question. Certainly aboveground carbon is a required pool for AR projects but I understand there may be little or nothing to measure for a number of years after planting. GreenTrees should include it in all monitoring events, but if there is nothing to measure, including it may just mean recording that this is the case. It would be useful to provide some photos indicating there is currently zero or close to zero measurable aboveground biomass. At the second field verification, five years hence, for some AR projects there may still be little aboveground to measure but I suspect in the case of GreenTrees with its cottonwood interplant design targeting fast early growth, that may not be the case.

Thanks
Nick

Nicholas Martin Chief Technical Officer
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APPENDIX G



ENVIRONMENTAL
SERVICES, INC.

GreenTrees, LLC.

Verification Statement

This statement confirms that Environmental Services, Inc. (ACR-Approved Verifier) has evaluated the greenhouse gas assertion by GreenTrees, LLC (Project Proponent) covering the period from 1 January 2008 to 31 December 2009 according to the protocols outlined by the American Carbon Registry, and that this verification statement is consistent with ISO 14064-3:2006 and ISO 14065:2007.

With the exceptions stated below, Environmental Services, Inc. (ACR-Approved Verifier) confirms all other verification activities including objectives, scope and criteria, descriptions of data supporting greenhouse gas assertions, and risk of reversal assessment that will be documented in the verification report are complete, and concludes with the qualification/limiting conditions provided below that the greenhouse gas assertion by Environmental Services, Inc. is without material discrepancy and that the verification activities provide a reasonable level of assurance as defined by ACR program rules. The forthcoming verification report will include all items required in the ACR Standard and ISO 14064-3, such as a description of objectives, scope, criteria, verification process, issues, and resolutions.

The greenhouse gas assertion provided by GreenTrees, LLC has resulted in the removal, emission reduction, or removal enhancement of:

Beginning (mm/dd/yy): 1 January 2008 Metric Tons CO₂e: 1,172.1
End (mm/dd/yy): 31 December 2009

Relative to the verification of this project the American Carbon Registry has issued specific guidance on the following aspects:

- approval of deviations from the sampling methodology as laid out in the Monitoring, Reporting, and Verification document (ACR email – 7 June 2010).
- approval of the regression equation used to calculate volume of trees with DBH < 1" (ACR email – 15 June 2010).
- inclusion of soil carbon/temporary exclusion of the forested carbon pool for stands where poor survival led to little to no above-ground biomass (ACR email – 15 June 2010).
- addition of GreenTrees series GT to this verification (ACR email - 17 May 2010).
- approval of the buffer calculation for both GreenTrees series A-1 and series GT (ACR email - 5 May 2010).

This verification statement is dependent upon GreenTrees satisfactorily addressing several outstanding issues including:

- the biomass equations used.
- the statistical calculations used for both soils and biomass.
- any additional issues that may arise as a result of changes therein.



ENVIRONMENTAL
SERVICES, INC.

GreenTrees, LLC/ACR Verification



ENVIRONMENTAL
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GreenTrees, LLC.

If the outstanding issues are addressed completely/satisfactorily by GreenTrees, ESI does not believe that these remaining issues will prevent ESI from providing a reasonable level of assurance that the GHG assertion is without material discrepancy as defined by ACR.

Attestation:

Shawn McMahon

Lead Verifier (Print Name)

Lead Verifier (Signature)

Lead Verifier

Title

29 June 2010

Date

Janice McMahon

Senior Internal Reviewer (Print Name)

Senior Internal Reviewer (Signature)

Vice President and Forestry, Carbon, and GHG
Services Division Director

Title

29 June 2010

Date

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