



## American Carbon Registry (ACR)

### Cleveland Metroparks/18 Reserves Forest Carbon Project Reporting Period 2 - Verification Report

<b>Offset Project Name:</b>	Cleveland Metroparks/18 Reserves Forest Carbon Project
<b>ACR Project ID</b>	ACR586
<b>American Carbon Registry Standard</b>	ACR Standard v6.0
<b>Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands</b>	Version 1.3 (April 2018)
<b>Reporting Period:</b>	01 January 2021 – 31 December 2021
<b>Aster Global Project Number:</b>	20090.01
<b>Report Date:</b>	01 September 2022

<b>Project Proponent:</b>	<b>Technical Consultant:</b>
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## 1 Executive Summary

Aster Global Environmental Solutions, Inc. (Aster Global) prepared this verification report in accordance with the outlined requirements of the American Carbon Registry's (ACR) Standard. Aster Global presents verification findings of the *Cleveland Metroparks/18 Reserves Forest Carbon Project* (hereafter, referred to as "*Project*") – prepared by Cleveland Metroparks and the Climate Trust (hereafter referred to as "*Project Proponent*"). The project verification was conducted as part of ACR's program requirements for GHG offset projects.

By ACR definition, the project is considered an improved forest management project (IFM). Project lands are located within Cuyahoga, Lake, Lorain, Medina, and Summit counties in Ohio. As stated in Section A5 of the GHG Plan, the projects goals are to "increase carbon sequestration by reducing harvest and maintaining mature forest cover, among other objectives, such as improving ecosystem resilience, increasing wildlife habitat, reducing invasive species presence, and growing research and monitoring of natural systems."

The Monitoring Report implementation verification included carbon sequestered through IFM on one contiguous tract (8,961 acres). The project asserts net emissions removals (sequestration) of 141,414 MtCO<sub>2e</sub> for the reporting period (01 January 2021 – 31 December 2021).

The verification objective included an assessment of the likelihood that implementation of the planned GHG project would result in the GHG emission removals/enhancements as stated by the project developer (ISO 14064-3:2006). The objective was to ensure that the project complied with the ACR Standard, the ACR Validation and Verification Standard, and the selected methodology criteria. Aster Global assessed the GHG emission removals of the IFM project.

Aster Global confirms all verification activities, including objectives; scope and criteria; level of assurance; and the Monitoring Report's adherence to the ACR Standard and validated GHG Project Plan, as documented in this report, are complete. Aster Global concludes without any qualifications or limiting conditions that the *Project* meets the requirements of ACR.

The GHG assertion provided by the *Project Proponent* and verified by Aster Global has resulted in the net GHG emission removal of 141,414 tCO<sub>2</sub> equivalents by the project during the reporting period (01 January 2021 – 31 December 2021).

## 2 Introduction

This verification report is prepared in accordance with the outlined requirements of the American Carbon Registry's (ACR) Standard. Aster Global presents verification findings of the *Project* – prepared by the *Project Proponent*. The project verification was conducted as part of ACR's program requirements for GHG offset projects (Improved Forest Management). Aster Global is accredited by the American National Standards Institute under ISO 14065:2013 for greenhouse gas verification bodies, including ISO 14064-3:2006, ISO 14065:2013, and verification of assertions at the project level for Land Use and Forestry (Group 3). Aster Global is approved to verify for ACR.

The GHG Project Plan implementation verification included carbon sequestered through IFM on one contiguous tract (8,961 acres). The project asserts net emissions removals (sequestration) of 141,414 tCO<sub>2</sub>e for 2021.

### 2.1 Contact Information – Roles and Responsibilities

<b>Project Owner / Project Proponent:</b>	Cleveland Metroparks Rosalina Fini, Chief Legal and Ethics Officer Phone: (216)-635-3216 Email: rmfl@clevelandmetroparks.com
<b>Accredited V/V Body:</b>	Aster Global Environmental Solutions, Inc. 3800 Clermont St NW North Lawrence, Ohio 44666
	Mansfield Fisher – Lead Verifier Matthew Campbell – Verification Team Member Taek Joo Kim – Verification Team Member Caris Lyons – Verification Team Member Caitlin Sellers – Verification Team Member Sandesh Shrestha – Verification Team Member Matthew Perkowski – Verification Team Member Ashley Laux – Verification Team Member Trainee Janice McMahon – QA/QC Shawn McMahon – Senior Internal Reviewer

### 2.2 Project Description

By ACR definition, the *Project* is considered an improved forest management project (IFM). Project lands are located within Cuyahoga, Lake, Lorain, Medina, and Summit counties in Ohio. As stated in Section A5 of the GHG Plan, the projects goals are to “increase carbon sequestration by foregoing significant timber harvesting and maintaining mature forest cover, among other objectives, such as improving ecosystem resilience, increasing wildlife habitat, reducing invasive species presence, and growing research and monitoring of natural systems.” The baseline scenario involves even-age regeneration harvest staged over 5 years and left to naturally regenerate from advanced regeneration, stump sprouts, and seed source.

## 2.3 Objective

The GHG Monitoring Report verification objective included an assessment that the implementation of the GHG *Project* resulted in the GHG emission removals/enhancements as stated by the project developer (ISO 14064-3:2006). The objective was to also ensure the *Project* was in compliance with the ACR Standard and that Aster Global met the ACR Validation and Verification Standard criteria.

## 2.4 Criteria

The criteria followed by Aster Global included ISO 14064-3, ISO 14065, and the verification guidance documents provided by ACR located at <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>. These documents included:

- *ACR Carbon Registry Standard (v6.0)*
- *ACR Validation and Verification Standard (v1.1)*
- *Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands (v1.3)*
- *ACR Tool for Risk Analysis and Buffer Determination v1.0*

## 2.5 Scope

The scope of the verification generally included the GHG Monitoring Report; GHG project implementation scenario; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; time periods covered; data management systems; roles and responsibilities of project participants or project proponent staff; QA/QC procedures and results; processes for and results from uncertainty assessments; and project-specific conformance to ACR eligibility criteria. The geographic scope was defined by the project boundary, which included the carbon reservoir types, management activities, growth and yield models, inventory program, and contract periods. The scope of the *Project* is defined below.

Baseline Scenario	The baseline scenario represents an aggressive harvest regime, targeted to maximize net present value at a 4% discount rate, typical of practices in the project region. The baseline practice involves patch cuts and group selection cuts staged over 5 years and left to naturally regenerate from advanced regeneration, stump sprouts, and seed source. The baseline scenario incorporates many conservative assumptions which are described in section B5 of the GHG Plan. Ultimately, 40% of total forest canopy cover will be retained as reserves within each reservation in the project area.
Activities/ Technologies/ Processes	Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands version 1.3
Sources/Sinks/ Reservoirs	Above-ground biomass carbon (Included) Below-ground biomass carbon (Included) Standing dead wood (Included)

	Lying dead wood (Excluded) Harvested wood products (Included) Litter/Forest floor (Excluded) Soil organic carbon (Excluded) Emissions from biomass burning (Included) Market Leakage (Included)
GHG Type	CO <sub>2</sub>
Project Location	The project area of approximately 8,961 acres located in parcels within Cuyahoga, Lake, Lorain, Medina, and Summit counties in Ohio, adjacent to the city of Cleveland.
Project Boundary and Time Period	Project Commencement Date: 15 January 2020 Project Crediting Period: 15 January 2020 – 14 January 2040 Reporting Period 2 Start Date: 01 January 2021 Reporting Period 2 End Date: 31 December 2021

## 2.6 Level of Assurance

The level of assurance was used to determine the depth of detail that the verifier (Aster Global) placed in the Verification and Sampling Plan to determine if there were any errors, omissions, or misrepresentations (ISO 14064-3:2006). Aster Global selected samples of data and information to be verified to provide *reasonable* assurance and to meet the materiality requirements of the project (ACR Validation and Verification Standard). ACR considers verification to be a risk-based process, where the verifier examines a sufficient amount of data and uses the verifier's professional judgment to provide a *reasonable* assurance.

## 2.7 Materiality

Materiality is a concept that the individual or aggregation of errors and omissions which could affect the GHG assertion and the decisions of the intended users. Materiality was also used as part of the Verification and Sampling Plan design, to determine the type of verification processes used by Aster Global to minimize the risk of not detecting a material misstatement. ACR's materiality threshold is +/-5% of the GHG project's emission reductions or removal enhancements. In other words, ACR requires that any differences between emission reductions/removals claimed by the *Project Proponent* and estimated by the verifier be immaterial (less than +/- 5%). 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.

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

For this Reporting Period, the calculation is as follows:

<b>Materiality Threshold</b>
<b>Contributions to Offset Materiality by Type (mTCO<sub>2</sub>e):</b>

Total reported GHG Reductions	141,414
<i>Project Emission Reduction Assertion</i>	141,414
<i>Verifier Emission Reduction Assertion</i>	141,414
$[(141,414 - 141,414) / 141,414] * 100$	0.00%
% Error	0.00%

A quantitative uncertainty assessment was performed as required by ACR. This involved an examination by the audit team where reported uncertainty typically specifies a quantitative estimate of the likely difference between or dispersion among reported values, and a qualitative description of the likely causes of said differences. The major sources of quantitative uncertainty assessed by the audit team included:

- Estimation or model: quantification methods and mathematical equations;
- Parameter: quantifying parameters in method (emission factor, activity data);
- Systematic: estimation bias (e.g., non-representative data, faulty equipment);
- Statistical: random variability of sample data

Quantitative uncertainty was primarily evaluated through independent data checks of the proponent's quantification materials. No differences were found using this method of quantitative uncertainty assessment. Please see Section 4.6.8 of this report where the impacts of Total Project Uncertainty (UNct) are reported. The audit team found no differences or discrepancies in ERT issuance.

Related to the uncertainty assessment, the audit team also evaluated; "whether the project data and information supporting the GHG assertion were based on assumptions and industry defaults, future projections, and/or actual historical records (ACR Validation and Verification Standard v. 1.1 Chapter 12). It was determined that the project data and information supporting GHG assertions was of high quality. Assumptions related inventory adjustments were confirmed to have remained unchanged from the initial verification and validation. The project was confirmed to have adopted a sensible and appropriate approach to the grow forward for the inventory. Industry defaults were in line with the audit team's expectations (e.g. CO<sub>2</sub> to Carbon biomass conversion factor of 3.664) and approved IFM methodology.

## 2.8 Validation and Verification Body's QA/QC System

As an accredited VVB by the ANSI National Accreditation Board (ANAB) under ISO 14064-3 and 14065, Aster Global developed the Aster Global Management Systems Manual which provides the procedures, conditions, requirements, and specifically the QA/QC procedures under which Aster Global conducts validations and verifications. For this project specifically, Janice McMahon was responsible for all QA/QC for the project. Additionally, Shawn McMahon was designated as the Senior Internal Reviewer for this project. The Senior Internal Reviewer



conducted a full review of all activities performed by the audit team during the course of the joint validation and verification to ensure the audit team followed all procedures that are outlined in the Aster Global Management Systems Manual.

### **3 Verification Process, Findings, and Conclusions**

The verification process closely followed the guidance provided by ACR Standard, the Validation and Verification Standard, ISO14064-3 and ISO 14065, and the Aster Global Management System and Management System Manual, Section V.5.

As defined by ISO 14064-3:2006 (E), “verification is the systematic, independent and documented process for the evaluation of a greenhouse gas assertion in a GHG project plan against agreed verification criteria”. Specifically, the project verification included the review of the requirements outlined in the ACR Standard. The assessment included the following items: project boundary, emissions, leakage, quantification of GHG reductions/removals, monitoring, data and parameters, and adherence to the project-level principals (relevance, completeness, consistency, accuracy, transparency, conservativeness).

Aster Global’s verification was generally broken down into three parts: desktop assessment, quantitative review, and meetings/interviews.

#### **3.1 Desktop Assessment**

Aster Global reviewed the Monitoring Report to assess conformance with the requirements of the ACR Standard. Key factors that impacted the reported emissions reductions were identified, and a Verification and Sampling Plan was created to focus on the critical elements presenting potential risk for errors in reported data. These elements included:

- Implementation of appropriate and adequate approach to project boundary definitions, by reviewing documentation of project boundaries and ownership status, and field conditions relative to clearly delineated ownership extents and control over management activities within the project area.
- Implementation of appropriate and adequate approach to baseline emissions calculations, by reviewing documentation and field conditions which reflect the most-likely without-project scenario and the emissions resulting from that scenario.
- Implementation of appropriate and adequate approach to inventory calculations and modeling, by reviewing documentation, reviewing conversion factors, and re-running selected calculations and modeling
- Implementation of appropriate and adequate monitoring, by confirming the application of approved/acceptable monitoring practices in the field, and the appropriate handling and analysis of field data once collated.
- Implementation of appropriate and adequate approach to data and parameters, by reviewing data handling practices, and reviewing documentation at each step of the data analysis procedure.
- Implementation and adherence to project-level principles, by reviewing documentation and discussing the application of project-level principles with core staff.



A complete list of documents received and reviewed is located in Appendix B.

### 3.2 Site Visit

Aster Global conducted an on-site assessment of the project lands on 19 – 21 January 2021, during the validation and initial verification assessment for the *Project*. The site visit was used to review project records with representatives of the *Project Proponent*, discuss the calculation of carbon pools and sinks, visit random portions of the ownership for reconnaissance and ground-truth of the submitted data, and monitoring approach.

For this verification event, no site visit was required nor occurred.

### 3.3 Quantitative Review

Aster Global focused on the quantitative analyses undertaken by the *Project Proponent* to assess the carbon pools accounted for by the project (above-ground biomass, below-ground biomass, standing dead wood, and harvested wood products). Aster Global's review included an assessment of the primary quantitative data supporting the GHG assertion including the direct sampling of biomass carbon and the use of modeling, as well as the *Project Proponent's* use of allometric methods and equations for calculating tree biomass, and the calculation of ERTs.

### 3.4 Meetings/Interviews

During the course of the project verification, Aster Global and the *Project Proponent* held multiple meetings. All other correspondence occurred via email. The details of the meetings are briefly described in the table below.

Date	Attendees	Topics Discussed
10 May 2022	Mansfield Fisher – Aster Global Josh Fain – TCT Madeline Montague - TCT	Opening Meeting, preliminary review of verification and sampling plan, review of travel logistics, project timeframes and deadlines.
01 September 2022	Janice McMahon – Aster Global Ashley Laux – Aster Global Caris Lyons – Aster Global Josh Fain – TCT Madeline Montague - TCT	Closing Meeting - Review of draft verification report - Next steps - Request feedback on process

### 3.5 Verification Milestones

Project/Verification Activity	Date
Aster Global Internal Conflict of Interest (COI) process completed and approved (no issues).	12 April 2022
ACR approval of ACR-Specific COI Form	03 May 2022

Submission of Verification and Sampling Plan to <i>Project Proponent</i> for approval	10 May 2022
Opening meeting with <i>Project Proponent</i>	10 May 2022
Submission and Receipt of signed Verification and Sampling Plan to and from <i>Project Proponent</i> for approval	16 May 2022
Round 1 - Corrective actions/clarification submitted	10 June 2022
Round 2 - Corrective actions/clarification submitted	28 June 2022
Aster Global completes review	18 August 2022
Aster Global's IPR completes review	22 August 2022
Aster Global holds closing meeting and finalizes report and submits to ACR and <i>Project Proponent</i>	01 September 2022

### 3.6 ACR Forest Carbon Project Standard Requirements

#### 3.6.1 ACR Standard/Eligibility Requirements

The *Project* is an IFM project that is intended to create additional carbon stocks in the project area through establishing tree cover on land that has been in agricultural land use for decades. The *Project* is in compliance with ACR's Standard. Specific details are located in the Validation Report.

- The project has a start date of 15 January 2020 and was successfully validated within 3 years of the start date.
- The *Project Proponent* commits to a minimum project term of 40 years, meeting the ACR project term requirement.
- The Project Proponent employs a 20-year initial crediting period in compliance with the criterion for IFM project.
- Only direct emission mitigation is counted and the project is only seeking ex-post credits.
- Ownership of offsets is clear.
- Ownership titling of land is clear.
- Project lands are eligible because they are eligible to be harvested by the *Project Proponent*.
- Project lands meet the definition of "forestland."

#### 3.6.2 Approved Methodology

The project utilized the following methodology and tools: Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands, version 1.3; and the ACR Tool for Risk Analysis and Buffer Determination, version 1.0.

Aster Global confirms that the project meets the applicability requirements of the methodology under which the project was validated and verified:

- The project occurs on non-federal U.S. forestlands.
- There is clear title to land and timber rights.
- There is clear title to offsets.
- The project area is able to be harvested by the *Project Proponent*.
- The project area meets the definition of Forestland.

### 3.6.3 Additionality

Aster Global confirms that the *Project* conducted the proper additionality analysis and conforms to both the methodology additionality requirements and ACR's Three-Prong Additionality Test. The *Project Proponent* sufficiently demonstrated in the GHG Project Plan and through the validation process that as of the project start date, the project activities exceed enforced laws and regulations, exceed common practice in the geographic region and forest type, and faced a financial implementation barrier.

### 3.6.4 Permanence and Risk Mitigation

The *Project Proponent* commits to a 40-year agreement with ACR. Aster Global confirmed that the *Project Proponent* adequately addressed other potential causes of unintentional reversals including tree death from wildfire, disease, drought, or wind.

The *Project Proponent* utilized the ACR-approved risk assessment tool. Aster Global reviewed and assessed the implementation and outputs of the tool provided by the *Project Proponent* and agrees with the calculated buffer withholding of 20%.

### 3.6.5 Baseline and Leakage

Aster Global confirms the project baseline as an aggressive harvest regime, targeted to maximize net present value at a 4% discount rate, typical of practices in the project region. The baseline practice involves patch cuts and group selection cuts, staged over 5 years. The baseline scenario incorporates conservative assumptions such as no harvesting within SMZs and including forest reserves in which no harvests will be conducted. Ultimately, in the baseline scenario 40% or approximately 3,808 acres of the total forest canopy cover will be retained in forest reserves. The final baseline scenario was calculated as the maximization of NPV of plausible harvest regimes.

The *Project Proponents* accounted for market leakage by applying a default market leakage discount factor of 40%, per the methodology requirements. The calculation of this default market leakage discount factor of 40% was confirmed by Aster Global.

### 3.6.6 Monitoring

Aster Global confirmed the continued appropriateness and implementation of the project monitoring plan, which details monitored data and parameters, measurements, timing, and data storage procedures.

### 3.6.7 Community and Environmental Impacts

Aster Global confirms the project's net positive community and environmental impacts and co-benefits including biodiversity, water quality, and natural habitat enhancements. Forests in the project area will be managed by monitoring and removing invasive species, preventing the clearing of mature hardwood trees, and ongoing monitoring of trees with harmful pests and pathogens. Ultimately, these management efforts will protect and enhance the health and diversity of natural resources within the Project Area.

### 3.6.8 Stakeholders Comments

While the community around the project area does not rely on the property for livelihood, the project addressed stakeholder comments sufficiently. The Reserves exist largely within an urban landscape and are heavily used by private and public interests. The Board of Park Commissioners of the Cleveland Metroparks District meets regularly to discuss all aspects of park management, and board meetings are open to the public and include a public comment period. Periodic updates about the status of the Project are expected to be provided at future Board meetings. Additionally, information about the Project will be made available on the CMP website.

### 3.6.9 GHG Emissions Reduction and Removal Enhancements (ERTs) for the Current Reporting Period 01 January 2021 – 31 December 2021

GHG Reductions or Removals	Units
Baseline Emissions / Reductions	(209,979) tCO <sub>2</sub> e
Project Emissions	25,712 tCO <sub>2</sub> e
Leakage	94, 277 tCO <sub>2</sub> e
Uncertainty Deduction Rate	0% <sup>1</sup>
Buffer Pool Contribution	28,283 tCO <sub>2</sub> e <sup>2</sup>
2021 GHG emission removals total (tCO <sub>2</sub> e)	15,427 tCO <sub>2</sub> e
Total Emission Reduction Tonne(s) (ERTs)	141,414 tCO <sub>2</sub> e

### 3.7 Verification Findings

The Aster Global verification team identified non-conformity reports (NCRs) and clarifications (CL). All were addressed satisfactorily by the *Project Proponent* during the project verification process. These NCRs and CLs provided needed clarity to ensure that the project was implemented in accordance with the approved methodology and was in compliance with ACR's Standard.

<sup>1</sup> Please note that the uncertainty was calculated as ~7.19% but was below the 10% ACR threshold.

<sup>2</sup> Please note that the risk buffer of 20% was not deducted, as project elected to source the buffer pool contribution from ERTs that were previously registered by The Climate Trust.



The complete list of verification findings and resolutions has been compiled and located in Appendix A.

### 3.8 Verification Results/Conclusions

Aster Global confirms all verification activities, including objectives; scope and criteria; level of assurance; and the Monitoring Report's adherence to the ACR Standard and validated GHG Project Plan, as documented in this report, are complete. Aster Global concludes without any qualifications or limiting conditions that the Project meets the requirements of ACR.

The GHG assertion provided by the *Project Proponent* and verified by Aster Global has resulted in the GHG emission removal of 141,414 tCO<sub>2</sub> equivalents by the project during the reporting period (01 January 2021 – 31 December 2021).

#### Submittal Information:

Report Submitted to:	The Cleveland Metroparks The Climate Trust TerraCarbon LLC
Report Submitted by:	Aster Global Environmental Solutions, Inc. 3800 Clermont St. NW North Lawrence, Ohio 44666
Aster Global Lead Validator/Verifier Name and Signature:	 Mansfield Fisher Lead Verifier
Aster Global Internal Reviewer Name and Signature:	 Shawn McMahon Senior Internal Reviewer
Aster Global Sr. Vice President/Technical Director Name and Signature	 Janice McMahon President
Date:	1 September 2022

MSF/SM/JM/AL/CJM 20090.01 TCT Cleveland Metro Parks ACR Ver Report Final  
 ACR SP: pf 9/1/2022f

## Appendix A – Aster Global Verification Findings

<b>Item Number</b>	<b>1</b>
<b>American Carbon Registry Standard Version 6.0, July 2019 Section</b>	2.B.4 Conservativeness
<b>American Carbon Registry Standard Version 6.0, July 2019 Requirement</b>	Claimed emissions reductions shall be rounded down to the nearest whole number; and
<b>Evidence Used to Assess (Location in PD, MR or Supporting Documents)</b>	MR
<b>Findings - Round 1</b>	The correct rounding rule has not been applied appropriately.
<b>Round 1 NCR/CL/OFI</b>	CL: Please update the quantification and all reporting documents to satisfy this requirement.
<b>Round 1 Response from Project Proponent</b>	Emissions reductions have been rounded down to the nearest whole number. Only once instance was found: pg 7 of the Monitoring Report.
<b>Findings - Round 2</b>	Emissions reductions are correctly rounded down in the calc workbook, however Table B5 in the MR RP2 Appendix has not been updated to correct for rounding.
<b>Round 2 NCR/CL/OFI</b>	CL: Please clarify in line with the finding and provide updated reporting documentation, as necessary.
<b>Round 2 Response from Project Proponent</b>	Thank you for this clarification. The Appendix has been updated: CMP Monitoring Report RP 2 APPENDIX_rev2022-06-30.docx
<b>Findings - Round 3</b>	Emissions reductions have been correctly rounded. This finding is closed.

<b>Item Number</b>	<b>2</b>
<b>American Carbon Registry Standard Version 6.0, July 2019 Section</b>	Table 4: Eligibility Criteria for AFOLU-Based Carbon Offset Projects
<b>American Carbon Registry Standard Version 6.0, July 2019 Requirement</b>	Project monitoring reports shall be completed for each verified reporting period using the template for Project Monitoring Report available at <a href="http://www.americancarbonregistry.org">www.americancarbonregistry.org</a> .
<b>Evidence Used to Assess (Location in PD, MR or Supporting Documents)</b>	MR

<b>Findings - Round 1</b>	The verification team notes that the MR uses template version 3. ACR released an updated Monitoring Report Template version 4 in May 2022.
<b>Round 1 NCR/CL/OFI</b>	CL: Please confirm that MR Template Version 3 is the correct version to be used by the project or update to Version 4.
<b>Round 1 Response from Project Proponent</b>	Version 3 was the most current template when we completed the form; we have updated to version 4.
<b>Findings - Round 2</b>	The MR has been updated to version 4, which is the most up-to-date template available on the ACR website. This item is addressed.

<b>Item Number</b>	3
<b>American Carbon Registry Standard Version 6.0, July 2019 Section</b>	6.E PROJECT MONITORING REPORTS
<b>American Carbon Registry Standard Version 6.0, July 2019 Requirement</b>	<p>Crediting Period - Crediting Period is the finite length of time for which a GHG Project Plan is valid, and during which a project can generate offsets against its baseline scenario. Crediting Periods are limited in order to require Project Proponents to reconfirm, at intervals appropriate to the project type, that the baseline scenario remains realistic and credible, the Project Activity remains additional, and GHG accounting best practice is being used. This is important because once a project has demonstrated its additionality, it is not required to do so again until applying to renew the Crediting Period. - All AR projects shall have a Crediting Period of 40 years. All IFM projects shall have a Crediting Period of 20 years. Avoided Conversion projects on both forest and non-forest land with land conservation agreements in place shall have a Crediting Period of 40 years, unless otherwise specified in chosen methodologies. Wetland Restoration/Revegetation projects shall have a Crediting Period of 40 years. The Crediting Periods for agriculture projects that avoid emissions by changing to lower GHG practices and those that include a soil sequestration component will be specified in the applicable methodology. Unless otherwise specified in the methodology, a Project Proponent may apply to renew the Crediting Period by complying with all then-current ACR requirements, re-evaluating the baseline scenario, re-confirming additionality, and using emission factors, tools, and methodologies in effect at the time of Crediting Period renewal. ACR does not limit the allowed number of renewals. Projects that are deemed to meet ACR additionality criteria are considered additional for the duration of their Crediting Period. If regulations or common practice change during the Crediting Period, this may make the project non-additional and thus ineligible for renewal, but does not affect its additionality during the current Crediting Period. If a project chooses not to renew its Crediting Period, it must continue monitoring and verification activities for the duration of the Minimum Project Term.</p>
<b>Evidence Used to Assess (Location in PD, MR or Supporting Documents)</b>	GHG Plan; MR



<b>Findings - Round 1</b>	The project crediting period is stated in the GHG Plan as January 15 2020 - January 14 2040. The crediting period stated in the MR is January 15 2020 - December 31 2040.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify why there is a discrepancy and if necessary please update the project documentation.
<b>Round 1 Response from Project Proponent</b>	Thank you for bringing this to our attention. The project crediting period is January 15 2020 - January 14 2040, as stated in the GHG plan. We have fixed the error in the MR.
<b>Findings - Round 2</b>	The audit team confirmed that the crediting period has been corrected in the CMP monitoring report RP 2_rev2022-06-13. This item is addressed.

<b>Item Number</b>	1
<b>American Carbon Registry Standard Version 6.0, July 2019 Section</b>	C3. BASELINE NET REDUCTIONS AND REMOVALS
<b>American Carbon Registry Standard Version 6.0, July 2019 Requirement</b>	Equation (5)
<b>Evidence Used to Assess (Location in PD, MR or Supporting Documents)</b>	MR Calcs workbook
<b>Findings - Round 1</b>	The audit team reviewed the CMP_ACR_Calcs_2021_MonReport.xlsx workbook and it appears that equation 5 is not applied appropriately. Additionally, the audit team noted that this value differs from the value presented in the validated GHG Plan and Monitoring Report.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify in line with the finding. If necessary, please update all necessary downstream calculations and reporting documentation.
<b>Round 1 Response from Project Proponent</b>	Equation 5 has been corrected in CMP_ACR_Calcs_2021_MonReport_rev2022-06-13; it now agrees with the GHG Plan. This correction does not affect downstream calculations for RP 2.
<b>Findings - Round 2</b>	The audit team reviewed the updated Equation 5 calculation and confirmed that the equation is applied correctly and now agrees with the GHG Plan.

<b>Item Number</b>	2
<b>American Carbon Registry Standard Version 6.0, July 2019 Section</b>	<b>D3. MONITORING OF CARBON STOCKS IN SELECTED POOLS</b>
<b>American Carbon Registry Standard Version 6.0, July 2019 Requirement</b>	The forest management plan, together with a record of the plan as actually implemented during the project shall be available for validation and verification, as appropriate.

<b>Evidence Used to Assess (Location in PD, MR or Supporting Documents)</b>	MR
<b>Findings - Round 1</b>	<p>The audit team reviewed the management plan that was provided at validation; however, it is unclear to the audit team if this is still the relevant version of the management plan.</p> <p>Additionally, the audit team is unclear what portions of the management plan have been implemented during the reporting period.</p>
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify in line with the finding and provide supporting documentation as necessary.
<b>Round 1 Response from Project Proponent</b>	The Mgmt Plan NR_Plan_Final.pdf provided from 2019 is the current plan.
<b>Findings - Round 2</b>	Thank you for the clarification. The project has asserted that no commercial harvest have occurred and thus are not subject to this requirement. This item is closed.

<b>Item Number</b>	3
<b>American Carbon Registry Standard Version 6.0, July 2019 Section</b>	<b>D6. MONITORING OF ACTIVITY-SHIFTING LEAKAGE</b>
<b>American Carbon Registry Standard Version 6.0, July 2019 Requirement</b>	<b>D6. MONITORING OF ACTIVITY-SHIFTING LEAKAGE</b>
<b>Evidence Used to Assess (Location in PD, MR or Supporting Documents)</b>	MR
<b>Findings - Round 1</b>	<p>The audit team was unable to confirm if there has been harvesting on other lands owned by the project proponent, there is no indication within the MR as to whether or not harvesting as occurred on other lands owned by the project proponent.</p> <p>The audit team was unable to find a shapefile of the lands that are owned by the project proponent but not included in the project.</p>
<b>Round 1 NCR/CL/OFI</b>	<p>CL: Please clarify in line with the finding.</p> <p>CL: Please provide a shapefile showing parcels owned by the project proponent but not included in the project.</p>

<b>Round 1 Response from Project Proponent</b>	For reporting period 1, the Mgmt Plan and attestation of no harvest from project proponent was accepted as evidence of no harvest or activity-shifting leakage. From the approved GHG plan pg. 43, "Quantification of leakage is limited to market leakage, as no activity-shifting leakage is allowed by the methodology beyond de minimis levels. A management plan, approved for use by ACR, was written prior to the project start and details harvest plans across all properties owned and managed by Cleveland Metroparks during the project lifetime, demonstrating that no activity-shifting leakage will occur."
<b>Findings - Round 2</b>	Thank you for the clarification. However, the requirement states "Forest management plans prepared $\geq$ 24 months prior to the start of the project showing harvest plans on owned/managed lands <b>paired with records from the with-project time period showing no deviation from management plans;</b> "
<b>Round 2 NCR/CL/OFI</b>	CL: Please clarify in line with the finding and provide documentation as required.
<b>Round 2 Response from Project Proponent</b>	We have provided an email from Constance Hausman, Sr. Conservation Resource Manager at CMP, attesting that no harvesting was conducted in 2021. File name: Re Reporting Period 2 Monitoring Report Update.pdf
<b>Findings - Round 3</b>	Thank you for the clarification. The VVB reviewed the attestation and is reasonably assured that no activity shifting leakage has occurred.

<b>Item Number</b>	4
<b>American Carbon Registry Standard Version 6.0, July 2019 Section</b>	<b>D8. ESTIMATION OF WITH-PROJECT UNCERTAINTY</b>
<b>American Carbon Registry Standard Version 6.0, July 2019 Requirement</b>	Equation (18)
<b>Evidence Used to Assess (Location in PD, MR or Supporting Documents)</b>	
<b>Findings - Round 1</b>	The audit team reviewed the MR and CMP_ACR_Calcs_2021_MonReport workbook and noted the following: 1. The MR incorrectly states UNC,P,t is 7.19%. Per the methodology, the parameter UNC,P,t refers to "with-project uncertainty" not "total project uncertainty." 2. The project fails to state UNC,P,t in the MR. Additionally, it is unclear to the audit team where this parameter is quantified.
<b>Round 1 NCR/CL/OFI</b>	CL: Please clarify in line with the finding and update reporting documentation and quantification documents as necessary.
<b>Round 1 Response from Project Proponent</b>	1. The MR Appendix and calculation workbook were corrected such that UNCT refers to total project uncertainty. 2. UNCP,t calculations were added to the workbook on the 'Uncertainty' tab. Updated cells are highlighted in yellow. UNCP,t was added to the MR appendix.

<b>Findings - Round 2</b>	The Project correctly calculated UNCP,t in "CMP_ACR_Calcs_2021_MonReport_rev2022-06-13_AG_CHECK" and updated relevant sections of the MR Appendix accordingly. This finding is closed.
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## Appendix B – List of Documents Received and Reviewed by Aster Global

Name	Received
CMP Monitoring Report 2021 APPENDIX.pdf	4/20/2022
CMP monitoring report RP 2.pdf	4/20/2022
CMP_ACR_Calcs_2021_MonReport.xlsx	4/26/2022
CMP_InventoryCalcsORIGINAL_rev20210510_BR (1).xlsx	4/26/2022
20090.01_TCT_ClevelandMetroParks_Round 1 Findings.xlsx	6/21/2022
CMP Monitoring Report RP 2 APPENDIX_rev2022-06-13.docx	6/21/2022
CMP monitoring report RP 2_rev2022-06-13.docx	6/21/2022
CMP_ACR_Calcs_2021_MonReport_rev2022-06-13.xlsx	6/21/2022
20090.01_TCT_ClevelandMetroParks_Round 2 Findings_20220628_TCT response.xlsx	6/30/2022
CMP Monitoring Report RP 2 APPENDIX_rev2022-06-30.docx	6/30/2022
Re Reporting Period 2 Monitoring Report Update.pdf	6/30/2022
CMP Monitoring Report RP 2 APPENDIX_rev2022-08-15.docx	8/15/2022
CMP monitoring report RP 2_rev2022-06-13.docx	8/15/2022