



## VERIFICATION REPORT

*ACR VERIFICATION OF THE BLUESOURCE – SHAAN SEET IMPROVED FOREST  
MANAGEMENT PROJECT, REPORTING PERIOD 3 (ACR534)*

Date: 1/19/2023

Version: 2.0

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Project Name	Bluesource – Shaan Seet Improved Forest Management Project
Project ID	ACR534
Reporting Period	1/10/2021 – 1/9/2022
Client	Anew Climate, LLC
Date of Issue	1/19/2022
Prepared By	S&A Carbon, LLC
Contact	7831 SE Stark Street, Suite 202 Portland, OR 97215 <a href="http://www.saacarbon.com">www.saacarbon.com</a>
Audit Team	Lead Auditor: Bill Stack Technical Reviewer: Robert Turner, Alexa Kandarís (under obs.) Technical Expert: Marty Duffany Biometrician: Elizabeth McGarrigle Approver: Alexa Kandarís Project Manager: Kyle Silon

## Summary

The Bluesource – Shaan Seet Improved Forest Management Project (the project) is located on approximately 8,892 acres of old growth hemlock-spruce forests on the West side of Prince of Wales Island in Southeastern Alaska. The project area is part of a much larger landholding of 23,040 acres received by Shaan Seet Inc. under the terms of the Alaska Native Claims Settlement Act. Historically, forests on these lands were utilized for subsistence use. In the early 1900s the forests were used for timber supply to support the construction of a cannery, and then later during the 1980's to provide sawlogs for several harvesting and marketing contract agreements with Sealaska Timber Corporation, an Alaska-based timber company, and Alaska Timber Corporation.

The project activity is Improved Forest Management (IFM), with Shaan Seet, Inc's forest management practices representing a significant improvement in the carbon storage and conservation value than higher return, more aggressive management regimes of industrial private lands in the region, which are characterized by shorter, even-aged rotations. Management decisions of the forest focus on sustainable, natural forest growth and maintenance harvests for essential activities and forest health. The project ensures long-term sustainable management of the forests, which could otherwise undergo significant commercial timber harvesting.

This report presents the project's verification results for the third reporting period to the American Carbon Registry (ACR) Standards. Its purpose is to systematically assess and report the project's conformance with the ACR standard requirements corresponding to this reporting period from 1/10/2021 – 1/9/2022. The evaluation included document analysis and interviews with the associated stakeholders. The scope of the verification included the ACR verification of the project's third reporting period to determine the project's conformance with the ACR Standard (v7.0), the applied ACR Improved Forest Management Methodology for Non-Federal U.S. Forestlands (v1.3), supporting ACR Program documents, and the validated GHG Plan.

The verification was performed through a combination of document reviews, and interviews and communications with the relevant stakeholders. The verification process included several official and documented exchanges between the verifier team and the project proponents to gather additional information for review and for examination of conformance with all applicable criteria. These exchanges entailed two rounds of an Issues Log produced by S&A to which the project proponents were required to respond. The issues identified included 3 non-conformances, 1 clarification and 1 new information requests. Verifiers confirmed in an email to the project proponents dated 11/4/2022 that all remaining issues were satisfied in the responses provided in the Issues Log.

Once all identified issues were adequately resolved, S&A Carbon drafted this final verification report and deems, with a reasonable level of assurance, that the project is in conformance with all of the requirements in the ACR Standards (v7.0), without qualifications or limitations. The project has been implemented in accordance with the validated GHG Plan over the third monitoring period with no deviations from the described project activities in the GHG Plan or from the applied ACR methodology.

S&A Carbon is able to issue a positive verification opinion for the 99,729 tCO<sub>2</sub>e of verified emissions reductions, as reported in the Monitoring Report dated 1/12/2023. The verification assessment covered the reporting period from 1/10/2021 to 1/9/2022 and verified the calculated emission reductions were achieved during the reporting period with a reasonable level of assurance. The overall permanence risk rating was 20%. Therefore, the total number of credits to be deposited in the buffer account for this monitoring period is 19,946 tCO<sub>2</sub>e.

## Abbreviations

ACR	American Carbon Registry
AFOLU	Agriculture, Forestry and Other Land Use
ANAB	ANSI (American National Standards Institute) National Accreditation Board
BMP	Best Management Practices
CO <sub>2</sub> e	Carbon Dioxide Equivalent
EPA	Environmental Protection Agency
ERTs	Emission Reduction Tons
GHG	Greenhouse Gas
HWP	Harvested Wood Products
ICS	Initial Carbon Stocks
IFM	Improved Forest Management
NRCS	USDA Natural Resource Conservation Service
OPR	Offset Project Registry
PD	Project Developer
PP	Project Proponent
RPF	Registered Professional Forester
S&A	S&A Carbon
TC	Technical Consultant
t	Metric Tonnes
USDA	United States Department of Agriculture
U.S.A	United States of America
VVB	Validation & Verification Body
VCS	Verified Carbon Standard

## 1 Introduction

S&A Carbon (S&A) has been asked by Anew Climate, LLC to verify the emission reductions generated by the *Bluesource – Shaan Seet Improved Forest Management Project* (the Project). The verification process is required by the American Carbon Registry's Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands (ACR IFM Methodology, v1.3). S&A verification activities began on 9/28/2022. This report presents the findings from the verification of the project's greenhouse gas (GHG) emission reductions/enhancements.

The Offset Project Registry (OPR) for this project is the American Carbon Registry (ACR), listed as ACR534.

### 1.1 Project Proponents

Role	Organization Name	Contact Information
Project Proponent	Shaan Seet, Incorporated	Ed Douville, President 501 Main Street, Craig, AK 99921 907-826-3251 <a href="mailto:eddouville@shaanseet.com">eddouville@shaanseet.com</a>
Offset Project Developer	Anew Climate	Liz Lott, Director of Forest Carbon Projects 2825 E. Cottonwood Pkwy, Suite 400 Cottonwood Heights, UT 84121 415-434-4165 <a href="mailto:llott@anewclimate.com">llott@anewclimate.com</a>

Entities listed in the table above are collectively referred to as project proponents (PP) throughout this document.

### 1.2 Description of Project

The project is located on approximately 8,892 acres of old growth hemlock-spruce forests on the West side of Prince of Wales Island in Southeastern Alaska. The project area is part of a much larger landholding of 23,040 acres received by Shaan Seet Inc. under the terms of the Alaska Native Claims Settlement Act. Historically, forests on these lands were utilized for subsistence use. In the early 1900s the forests were used for timber supply to support the construction of a cannery, and then later during the 1980's to provide sawlogs for several harvesting and marketing contract agreements with Sealaska Timber Corporation, an Alaska-based timber company, and Alaska Timber Corporation.

The project's forest management practices represent a significant improvement in the carbon storage and conservation value than higher return, more aggressive management regimes of industrial private lands in the region, which are characterized by shorter, even-aged rotations. Management decisions of the forest focus on sustainable, natural forest growth and maintenance harvests for essential activities and forest health. The project ensures long-term sustainable management of the forests, which could otherwise undergo significant commercial timber harvesting.

Date Description	Date
Project Start Date:	1/10/2019
Crediting Period	1/10/2019 -1/9/2039
Reporting Period	1/10/2021-1/9/2022
Verification Start Date	9/28/2022

### 1.3 Verification Objectives

This is the Project's third verification. This will be a less-intensive desk verification, not including a site visit to assess the Project's conformance with the ACR criteria outlined below, corresponding to the third reporting period from 1/10/2021 – 1/9/2022.

The objectives of verification are to evaluate the following:

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

Further, S&A will review the Monitoring Report's GHG Assertion and any additional relevant documentation to determine:

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

### 1.4 Verification Scope and Criteria

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

The objectives of verification are to evaluate the following:

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

The criteria for the offset verification services are:

- The American Carbon Registry Standard, v7.0, December 2020
- The ACR Validation and Verification Standard, v1.1, May 2018
- The Improved Forest Management (IFM) Methodology for Non-Federal U.S. Forestlands, v1.3, April 2018
- The ACR Forest Carbon Project Standard, v2.1, November 2010
- Errata and Clarifications for ACR IFM Methodology v1.3, April 12, 2022
- ACR Tool for Risk Analysis and Buffer Determination v1.0
- ISO Standards 14064-2 and 14064-3, 2006

## 1.5 Materiality

The verification team must state with reasonable assurance the percent of the total reported GHG emission reductions and removal enhancements are no more than +/- 5.00% of the “true” GHG emission reductions and removal enhancements, as calculated by the verifier using the equation below.

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

## 1.6 Level of Assurance

S&A Carbon provides reasonable assurance that the Project meets the above criteria.

## 1.7 Audit Team

Role	Name
Lead Verifier	Bill Stack
Technical Reviewer	Robert Turner, Alexa Kandarlis (under obs.)
Biometrician	Elizabeth McGarrigle
Technical Expert	Marty Duffany
Approver	Alexa Kandarlis
Project Manager	Kyle Silon

## 2 Audit Process and Methodology

S&A’s verification audit included the following activities:

### 2.1 Desk Review

A kickoff conference call was held on 9/28/2022. The project team and verifiers discussed initial findings from a desk review of submitted documents, targeting aspects of the project and supporting information that might affect the evaluation.

The Monitoring Report and associated supporting documents were provided to the verifiers on 9/28/2022. As eligibility was validated during the initial reporting period, verifiers completed a cursory assessment of the eligibility criteria required to design, measure, and monitor the Project to the requirements of the ACR Standard and IFM Methodology. Verifiers confirmed the ACR eligibility requirements were met. The Verification Plan was completed and sent to the PP on 10/4/2022.

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



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

## 2.2 Quantitative Review (only required for verification)

The data and information supporting the PP's GHG assertion for this Project is based on historical records (forest inventory data from the first Reporting Period) and future projections (modeled tree growth). To verify this assertion, S&A conducted various quantitative analyses of the project & baseline carbon stocks, covering the relevant carbon pools quantified by the PP, and the inputs used in the calculation of the projected ex-ante emission reductions over the first 20-year crediting period as well as the actual ex-post emission reductions for this third reporting period. The audit team implemented a cursory review of the baseline model quantification validated during the initial reporting period; and a detailed review of the estimation process for calculating project stocks including forest inventory design and specifications, inventory datasets, the correct assignment of volume and biomass equations, and checks to confirm that modeled growth used to project carbon stocks forward have been calculated and applied correctly. The modeling methods were assessed to ensure an approved model was used, that it was appropriately calibrated for the region, and inventory data flow through the modeling system was clearly described and accurately implemented.

The reported ex-post emission reductions were confirmed by tracking all components of the PP's emission reduction calculation workbooks. This included checks that the entries for the project and baseline stocks, baseline and project harvested wood products long-term carbon storage, project risk rating determination (and associated buffer), and leakage and uncertainty percentages are all entered and calculated correctly from their computed sources, as well as confirming the accuracy of their sources. The entire RP3 treelist database (inventory + 2.9-yr modeled growth) was independently recalculated by the verifiers and the results were compared to the PP's reported carbon stocks.

According to the ACR IFM Methodology, estimation of uncertainty for pools and emissions sources for each measurement pool requires calculation of both the mean and the 90% confidence interval. In all cases uncertainty should be expressed as the 90% confidence interval as a percentage of the mean. Baseline and project uncertainties, 16.3% and 16.4% respectively, remain unchanged since the time of project validation and the initial inventory.

Total uncertainty and associated uncertainty deductions if applicable are calculated using equation 19 which includes both the baseline and project uncertainty parameters. If total uncertainty is above 10%, then an uncertainty discount is applied to the calculation of ERTs in equation 20. Total uncertainty and associated deductions were also independently calculated by the verifier. Total project uncertainty decreased slightly from 13.91% (RP2) to 13.84% for RP3.

## 2.3 Interviews

The following is a list of the people interviewed as part of the verification. The interviewees included those people directly, and in some cases indirectly, involved and/or affected by the project activities. The training and qualifications of the PP team was confirmed by reviewing bios and team websites on 10/5/2022 (<https://anewclimate.com/> and <https://shaanseet.com>). The verification team also confirmed these qualifications during interviews with the TC staff throughout the verification.

Date	Name	Title
Throughout Verification	Katie Krejsa	Forest Carbon Analyst -Anew Climate LLC
11/1/2022	Greg Staunton	SE AK Forester- Alaska Department of Natural Resources-Division of Forestry

## 2.4 Findings

Throughout the verification, findings were recorded by the audit team as per guidance outlined in the ACR IFM Methodology and supporting documents cited above. Any discrepancies identified by the verification team were documented in the Issues Log. The verification team has also documented in the Issues Log the source of any difference identified, including whether the difference results in a correctable error. The Issues Log was submitted to the client. Prior to completion of the verification, all identified non-conformances were required to be addressed, and correctable errors, where the error exceeded 1%, were required to be fixed. The client submitted additional evidence for S&A's evaluation for conformance during the verification process. All issues were resolved as part of the Issues Log process.

## 2.5 Audit Schedule

The following table summarizes the key audit milestones:

Verification Activity	Proposed Date	Actual Date
Kick-off meeting	9/28/2022	9/28/2022
S&A Carbon submits issues log v1.0	10/7/2022	10/7/2022
PP response to issues	10/19/2022	10/19/2022
S&A Carbon submits issues log v2.0	10/28/2022	10/27/2022
PP response to issues	11/9/2022	11/4/2022
S&A Carbon closes out issues log	11/10/2022	11/4/2022
S&A Carbon submits verification report for Technical Review	11/10/2022	11/8/2022
S&A Carbon submits verification report for PP review & approval	11/15/2022	11/15/2022
S&A Carbon submits final verification documents to ACR	11/16/2022	11/17/2022

## 2.6 Eligibility Requirements

As eligibility requirements were validated and verified during the initial reporting period, verifiers conducted a cursory review of the Project against the eligibility criteria of the ACR Standard as well as the applicability conditions of the ACR IFM methodology applied by the project and determined the project to be still eligible and applicable for the given requirements. The project applied an ACR approved methodology, Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands (v1.3). The project was found to meet the eligibility requirements of the ACR Standards in terms of its Start Date, Minimum Project Term, Crediting Period length, Land Eligibility & Title/Ownership, Adherence to Natural Forest Management Requirements and the Permanence of the generated GHG emission reductions. It was also found to meet the applicability conditions of this methodology in terms of land ownership type, legality of harvesting activities, types of project activities and natural forest management criteria.

The minimum project term stated in the GHG Plan is 40 years as required by the methodology. The Crediting period is 20 years, consistent with the applied methodology.

The project is an IFM project type and has consisted of the required forest cover through the project start date and initiation. The current project activities do not include commercial harvesting. The verifiers are reasonably assured the project area is located on non-federally owned lands within the state of Alaska, USA. The project area lands were conveyed to the Shaan Seet, Inc (village corporation listed under Sealaska AK Native Corporation) through the Alaska National Lands Conservation Act, which resulted in the federal US government no longer having jurisdiction over the conveyed lands. As such, the land is considered to be under private ownership, and there are no legally binding restrictions to harvest timber on privately owned lands in Alaska.

The project area is composed of forest cover, made up of 100% native species with western hemlock being the most prevalent species at nearly 53% of the total basal area. The project activity doesn't involve any use of non-native species.

## **2.7 Additionality**

In order to demonstrate the GHG emission reductions from the project are additional and considered to be above and beyond the “business as usual” scenario, the Project must pass the ACR three-prong additionality test prove that it currently exceeds current effective and enforced laws and regulations; exceed common practice in the relevant industry sector and geographic region; and face at least one of the three implementation barriers (financial, technological or institutional). For the initial reporting period, the PP elected to demonstrate there are financial barriers to implementing the project activities. The project's validation and verification for this initial reporting period found the Project passed this test and confirmed that it met the requirements for Additionality. For the third reporting period, verifiers completed a cursory check of the results of the three-prong additionality test completed during the initial reporting period. Based on this check, verifiers can confirm the Project passes the ACR three-prong additionality test in meeting the requirements for Additionality (see the verifiers data check log).

## **2.8 Permanence and Risk Mitigation**

In accordance with the ACR IFM Methodology (Section 5B), the PP has utilized the ACR Tool for Risk Analysis and Buffer Determination (v1.0) to determine the permanence risk rating (%) for Reporting Period 3. Verifiers reviewed the percent contributions for each risk category and found the individual risk ratings reasonable, appropriate, accurate and well supported with documentation to justify the associated risks for RP3. Except for the Diseases & Pests risk category, the risk rating for all the other risk categories remained the same as the previous reporting periods. The risk rating for Diseases & Pests increased from 4% to 8% due to the potential of insect infestations/diseases within or near the project area, which increased the total risk rating from 16% (RP2) to 20% for Reporting Period 3 (see Issues Log #22-4 for further details). Verifiers confirmed the calculation to estimate the total risk rating; it was completed correctly and accurately transferred to the project's Monitoring Report and ERT calculation workbook for RP3.

Thus, 20% of the gross emission reductions will be deposited into the ACR buffer account. This deduction is made to the gross ERT calculations produced by the PP's to determine the total tradeable balance of ERTs generated by the project over the third reporting period. Carbon stocks are projected to increase compared to the baseline conditions, through maintenance of stocks, and continued forest

growth over time, and the supporting quantification materials have shown an increase in on-site carbon stocks since the initial reporting period. As mentioned, percent contributions for each risk category have been applied based on guidance in the tool ACR Tool for Risk Analysis and Buffer Determination.

## 2.9 Baseline

A thorough Baseline review was required for the project's validation and initial verification, as this is a verification for the third reporting period, the degree of baseline review is reduced. Nevertheless, verifiers did trace data from the RP3 Monitoring Report and the GHG Plan back to the results of the baseline modeling and did a general review of the baseline modeling process. The level of review was not further augmented as no issues of concern surfaced during this process. The baseline modelling assumptions have been previously confirmed as being in conformance with the requirements of the ACR Standard during the last (initial) full verification. The analytical methods used to apply growth to current stocks over the first 20-year baseline period are described in the GHG Plan. The verifiers reviewed these calculations and procedures once more and found:

- The FVS model was calibrated and used appropriately;
- The application of the model results is accurate and appropriate; and
- The amount of growth predicted by the model is consistent with FIA estimates for the region and is consistent with published studies.

Baseline carbon in long-term storage in harvested wood products was calculated based on projected harvest volume removals from the FVS model. Harvest volumes were broken out into the categories of softwood sawlog, softwood pulp, hardwood pulp and hardwood sawlog by referencing the merchantability standards in FVS. Harvest volumes were converted to biomass by applying species-specific specific gravity values. Biomass values were then converted to units of tCO<sub>2</sub>e using appropriate conversion factors. Carbon transferred into wood products was estimated by applying the appropriate mill efficiency values. Carbon in wood products was then summed across the established wood categories and distributed to various end wood product classes. Carbon in long-term storage was then summed for in-use wood products and wood products in landfills to produce annual total tCO<sub>2</sub>e stored in in-use and landfill by applying the appropriate 100-year storage factors taken from the ACR IFM Methodology. Emissions due to burning logging slash are conservatively assumed in the baseline to be zero. Verifier checks of the baseline carbon storage in harvested wood confirmed the accuracy of the PP's ERT calculation worksheet in accordance with the ACR IFM methodology.

## 2.10 Leakage

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

As described in the GHG Plan, quantification of leakage is limited to market leakage. The PP does own approximately 14,148 acres of forestland outside of the project area, and the landowner asserts they have not commercially harvested timber anywhere within their ownership during RP3, including these

lands outside of the project area (see the PP's project document: *Shaan Seet RP3 No-Harvesting Confirmation*). The PP therefore asserts there is no activity shifting leakage.

To additionally confirm, the verifiers contacted the Southeast Alaska area forester (Greg Staunton) of the Alaska Department of Natural Resources-Division of Forestry to assess if there was any harvesting conducted during the reporting period on any of the Shaan Seet Inc. lands. He was not aware of any harvesting occurring on these lands during the reporting period. Based on this input and the land owner's attestation, verifiers are reasonably assured there was no activity shifting leakage as a result of the project activities during RP3.

Quantification of leakage of the project is therefore limited to market leakage. Market leakage was determined by quantifying the merchantable carbon removal in both the baseline and with-project scenarios. Carbon in long-term storage in in-use wood products and landfills was used to assess relative amounts of total wood products produced in the baseline and project. No commercial timber harvesting is projected to occur in the implementation of the project. The decrease in wood production relative to the baseline was calculated to determine the applicable market leakage discount factor in accordance with the methodology. Since the project activities decrease total HWP produced by the project relative to the baseline by 25% or more over the crediting period, the leakage deduction is 40%. This leakage deduction was found to be correctly determined and correctly applied in the PP's supporting ERT calculation workbook.

## **2.11 Monitoring Requirements**

Section D of the GHG Plan outlines the project's monitoring plan. All appropriate data and parameters to be monitored over the life of the project are outlined including details on the unit of measurement for the data/parameter, a description of the parameter, the data source used, the measurement methodology, monitoring frequency, values applied, procedural and QA/QC references, the purpose of the data and the calculation method. The monitoring plan also indicates that each year, the project will sign and submit to ACR the required attestations confirming: the continuation of the project activities, that ownership of the project area remains clear and uncontested, and a disclosure of any negative environmental or community impacts and if necessary documented plans to mitigate any reported negative environmental or community impacts. These attestations are now included as a component of the signed Monitoring Report for this third reporting period, which satisfies the ACR Standard's requirements noted in Chapters 3, 8 & 10.

Project monitoring is generally focused on the project's on-site carbon stocks through updates to the project's forest inventory data. A full re-inventory of the project area is to take place at least once over each decade following validation & initial verification to allow for calibration of the growth model and improve the project's carbon sequestration estimates. For those years in-between when an updated inventory is carried out (such as RP3), on-site carbon stocks will be monitored through forest growth and yield modeling. Beyond forest inventory updates, the PP continually monitors the general health and condition of the forest through the course of regular forest management activities by Shaan Seet including road maintenance, water quality and quantity monitoring or boundary maintenance. For the project's third reporting period ending in January 2022, the PP utilized the inventory treelists collected in Reporting Period 1 (May 2019) to estimate the project stocks for RP3: the 2019 inventory data was grown forward (2.9 years) via modeling to the end of the reporting period.

QA/QC for both forest and desk-based procedures have been established as part of the monitoring plan and are outlined in section D2 of the GHG Plan and the Inventory Methodology document (*Shaan Seet Carbon Plot Methodology*). Procedures are described more fully in these noted documents that include (1) collecting reliable field measurements (contractor measurement tolerances & checking cruising); (2) verifying data entry techniques; and (3) data storage.

In accordance with the forest inventory-based QA/QC procedures, at least 5% of the 2019 inventory plots were checked by a different cruiser than the individual who measured the plot. The plot check cruise involved a full plot measurement to identify any issues or significant discrepancies. Any consistent errors were resolved through discussion with the cruisers who carried out the original measurements or removal of the individual if deemed necessary. Further details on the methods and results of the checking cruising are provided in the Verification Report for RP1.

The desk QA/QC procedures involve a three staged review process with the intent of ensuring that all data is appropriately managed and maintained, and that all subsequent modeling and carbon calculations that feed into the ERT issuance are correct and accurately transferred to the Monitoring Report. This three-staged review process involves independent forester review, technical review and senior management review (additional details are provided the verifiers data check log for Reporting Period 1).

The technical consultant, Anew Climate, manages the carbon project on behalf of Shaan Seet Inc. including inventory, management planning and report preparation, and database and record keeping (GIS, mapping, etc.). The PP's forest management records and associated GIS data are stored locally and on cloud-based servers. Anew Climate prepares, monitors, and maintains the carbon project database. Both systems are backup on a regular basis.

The verifiers found no significant issues with the 2019 inventory data during the RP3 verification process nor with the grown forward inventory data to estimate the end of reporting period stocks. Verifiers do not believe there were any systematic issues or a lack of quality control on behalf of the PP's processes. While the verifiers did uncover some minor issues during the verification process for this third reporting period (i.e., re-assessment of the permanence risk rating and uncertainty calculations), we find no reason to further question the implementation or effectiveness of the PP's established QA/QC mechanisms. Verifiers discussed these QA/QC procedures during the verification process. Based on our review results, the verifiers are reasonably assured the PP's established QA/QC procedures were followed and the underlying data for the project carbon stock estimate for RP3 is accurate and correctly calculated.

## **2.12 Community and Environmental Impacts**

Community and environmental project impacts were assessed during the initial reporting period. Section F1 of the project's GHG Plan summarizes the Community and Environmental Impact Assessment addressing the requirements of the ACR Standard. For Reporting Period 3, the Monitoring Report (Part III) provides this summary which has not changed since the initial reporting period. Within the Monitoring Report (Parts III & IX), the PP attests there were no undisclosed or unmitigated adverse environmental or community impacts.

As stated in the GHG Plan and clarified during the initial verification and validation process, the project is not a community-based project. The project area is privately owned and no communities or other

stakeholders are affected by the project activities. Updates regarding project development and monitoring are discussed and communicated by the Boards of Directors in their scheduled board meetings. For Reporting Period 3, the verifiers agree with this determination based on the review of the project's ownership and design as well as the findings from the initial reporting period (please refer to the RP1 Validation/Verification Report for additional information).

The GHG Plan gives a general assessment of the project's environmental risks and impacts, covering the relevant factors outlined in the standard. Environmental benefits include reduced soil erosion and degradation, improved water quality, increased recreational opportunities, and habitat protection (e.g., wildlife, fisheries, plants). Verifiers continue to agree with these positive environmental impacts of the Project for Reporting Period 3. As there are no negative environmental impacts there is no need to describe how these impacts will be avoided or minimized. Additionally, as stated in the Monitoring Report for RP3 (Section IX), the PP attests the project is in compliance with all applicable environmental laws and regulations; the verifiers concur with this statement.

Monitoring of the risks and impacts is covered in section D.2 of the GHG Plan which gives an outline of forest inventory monitoring through on-the-ground measurements and through forest growth and yield monitoring. In addition, the landowners management staff will consistently monitor the general health and condition of the forest through the course of normal management activities. Since the project activities are projected to not include any timber harvesting, these monitoring methods are considered to be sufficient. The Impact Assessment includes a description on how the positive impacts contribute to the Sustainable Development Goals as required by the ACR Standard.

## **2.13 Stakeholder Comments**

As noted in the initial reporting period's Verification Report, the GHG Plan asserts that Stakeholder comments are non-applicable. The Project Proponent, Shaan Seet Incorporated is a private forestland owner, and adhered to their internally agreed upon practices of project consultation and notification on associated decision making. The PP indicated they would provide references to the publicly available documentation for the project when requested. Information regarding the carbon project can be requested from the Board of Directors of the Corporation. Information on the project is available from the Shaan Seet's Board of Directors which the verifiers deemed to be sufficient for the initial reporting period and RP3 in addressing this requirement. The GHG Plan indicates the project is not a community-based project. The verifiers continue to agree with this determination considering the project ownership and design as well as the findings from RP1.

## **3 Verification Activities**

### **3.1 Project Implementation Status**

As previously described in this report, the project was validated to the ACR Standards, and its initial reporting period verified. For this third reporting period, the PP submitted a completed copy of the Monitoring Report that provides the information required in the ACR monitoring report template (v4). The verifiers are reasonably assured there were no changes to the landowner, project area, or inventory data during this reporting period.

The Monitoring Report outlines the data and parameters monitored over the reporting period, which are found to be consistent with the data and parameters included in the monitoring plan of the GHG

Plan. This report also includes the updated project's GHG emission reductions including baseline emissions, project emissions, leakage emissions, contributions to the buffer pool, and a summary of the net GHG emission reductions at the end of the reporting period. The verifiers confirmed the supporting calculations for these carbon sinks, sources and reservoirs were correctly estimated in the PP's ERT calculation workbook and the final values were accurately transferred and reported in the Monitoring Report. During the verification process, minor calculation discrepancies were identified (e.g., project uncertainty percentage), which were subsequently addressed and resolved by the PP (see the Issues Log items 22-3, 22-4 and 22-5 for further details).

As mentioned, project level live carbon stocks for the third reporting period were projected from the original inventory data (May 2019) by deriving individual live tree diameter growth rates from the FVS model run with no management (growth only) as there was no commercial harvesting. Inventory data was grown forward 10 years in FVS, and for each plot, the average CO<sub>2</sub> growth was calculated by dividing the difference between 2019 – 2029 by 10. No burning of any biomass occurred so emissions from the burning of logging slash is considered to be zero. No commercial harvesting took place so project harvested wood products also equals zero.

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

### 3.2 Data-Checks & Materiality

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

SSR (rank)	Data reviewed	Reported (PP) tCO <sub>2</sub> e	Calculated (VB) tCO <sub>2</sub> e	Discrepancy tCO <sub>2</sub> e	Impact on materiality/ conformance
	Checks performed				
Rank 1 Sum of Project stocks; end of RP (CP,TREE,t, CP,DEAD,t, CP,HWP,t, GHGP,t)	2019 Inventory grown to EORP based on modeling, volume and biomass equations, calculation methods	1,572,425	1,572,412	13	Impact on Materiality
	Calculate carbon stocks from inventory.				
Comment: Discrepancy due to slight differences in strata averages and rounding.					
Rank 2 20 Yr Average Baseline stocks (live and dead tree CO <sub>2</sub> e)	Monitoring Report and supporting modeling documents. Model appropriateness and use. Data systems.	753,354	753,354	0	No impact on Materiality



CBSL,AVE (total)	Model calibration. Model performance against independent benchmarks. Checks of accumulations and correct transfer to Monitoring Report.				
Comment: NA					
Rank 3 Emissions Reduction at t (after buffer deduction) (CACR,t)	Monitoring Report	99,729	99,723	6	Impact on materiality
	Checks that all PP entries are correct. Check sources. Checks that calculations within the worksheet are correct. Calculation check uses PP and VVB values.				
Comment: Discrepancy due to difference in estimate of the project stocks					
Rank 4 Market Leakage Discount Factor (LK)	Monitoring Report, supporting documents.	53,189 (40%)	53,189 (40%)	0	No impact on Materiality
	Confirm model projections and sums. Correct use of HWP worksheet				
Comment: NA					
Rank 5 Buffer Credits and Risk Rating (TBt)	Monitoring Report, supporting worksheets	19,946 (20%)	19,946 (20%)	0	No impact on Materiality
	Checks all PP entries for buffer estimate have been calculated correctly. Calculation check uses PP values.				
Comment: NA					
Rank 6 Total Uncertainty (UNCT)	Monitoring Report supporting worksheets	12,819 (13.84%)	12,819 (13.84%)	0	No impact on Materiality
	Use PP data for initial stocks; checks the calculation of total uncertainty was done correctly. Recalculated from initial inventory.				
Comment: NA					
Rank 7 Baseline Harvested Wood	Monitoring Report, supporting worksheets	9,333	9,333	0	No impact on Materiality

Products (CBSL,HWP,t)	Model results, HWP worksheet. Confirm model projections and sums. Correct use of appropriate mill efficiencies, product classes and long-term storage factors.				
Comment: NA					
Rank 8 HWP Project (CP,HWP,t)	Monitoring Report, supporting worksheets	0	0	0	No impact on Materiality
	GIS review, interviews with the PP and stakeholders				
	Confirm no project harvesting during the RP				
Comment: NA					

The verification team must state with reasonable assurance the percent of the project's total reported GHG emission reductions and removal enhancements is +/- 5.00% of the "true" GHG emission reductions and removal enhancements for the reporting period, as calculated by the verifier using the equation below. The analysis must consider all errors, omissions or misstatements, for the subset of data included in the data checks. Any errors, omissions or misstatements are identified separately in the table above.

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

$$\text{Percent error} = \frac{[99,729-99,723]}{99,723} \times 100 = 0.006\%$$

Project ERTs – Verifier ERTs	Verifier ERTs	Percent Error*
6	99,729	0.006%

\*Note: In this column, a positive value represents *over-reporting* by the PP.

The materiality check was carried out according to ACR guidance using the equation above. The verifiers independently calculated the reporting period ERTs using their internal calculation of total project level stocks. The verifiers' calculation of ERTs was 6 tCO<sub>2</sub>e lower than the PP's calculation using their quantified parameter values. The materiality calculation shows the project is 0.006% over-reporting. Thus, the project is less than the 5.0% materiality threshold.

### 3.3 Verification Conclusion

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

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

S&A has verified the PP's Total GHG assertion of **99,729 tCO<sub>2</sub>e** for Reporting Period 3, which is summarized by vintage year below.

Vintage Year	Total ERTs (tCO <sub>2</sub> e)	Total ERTs to Buffer Pool (tCO <sub>2</sub> e)	ERTs Net (tCO <sub>2</sub> e)
<b>2021</b>	97,270	19,454	77,816
<b>2022</b>	2,459	492	1,967
<b>Total for RP3</b>	99,729	19,946	79,783

S&A has also verified the PP's removals by vintage years for Reporting Period 3.

Vintage Year	Removals (tCO <sub>2</sub> e)	Other ERTs (tCO <sub>2</sub> e)	Total (tCO <sub>2</sub> e)
<b>2021</b>	16,112	81,158	97,270
<b>2022</b>	407	2,052	2,459
<b>Total for RP3</b>	16,519	83,210	99,729

## Appendix A:

### Project Documents

Document Description		Filename
Listing		ShaanSeet_ListingForm_12_13_19
Monitoring Report		ShaanSeet_RP3_MonitoringReport_1_12_23
GHG Plan		ShaanSeet_GHG_Plan_03_09_21 ShaanSeet_100Yr_Calcs_12_7_2020.xlsx
Calculation Workbooks	Monitoring/ER	ShaanSeet_RP3_ERT_HWP_11_3_22
	Live Tree Calcs	ShaanSeet_RP3_CO2_Calc_10_18_22
	Risk Rating RP3	ShaanSeet_RP3_RiskScore_10_31_22
Inventory	Methodologies	ShaanSeet_Carbon_Plot_Methodology_11_22_21 ShaanSeet_Inventory_Checks.pdf
	Sampling Design	Shaan Seet Stratification Methodology.pdf
	Inventory Results	ShaanSeet_InventoryNotes_8_6_20.xlsx
Spatial	Strata	ShaanSeet_Strata_9_25_20.shp
	Plots	ShaanSeet_Plots_9_25_20.shp; ShaanSeet_RemovedPlots_12_2_20.shp
	Ownership	ShaanSeet_Boundary_10_2_20.shp; ShaanSeet_FullProperty_10_2_20.shp
Attestations	No harvesting	Shaan Seet RP3 No-Harvesting Confirmation

### Verifier Documents

Document Description	Filename
Project Specific COI Form	ACR534-RP3_COI Form
Verification Plan	ACR534_Verification Plan_v1.5
Sampling Plan	ACR534_Sampling Plan_v1.5
Data Check Log	ACR534_RP3_DataCheckLog_10Nov2022
Issues Log	ACR534_IssuesLog_v1.2_4Nov2022_Closed

## Appendix B: Findings List

Verifier Issue							
Issue ID:	22-1	Status:	Closed	Checked by:	BS	Date Identified	4-Oct-22
ACR Standard ref	GHG Plan Section	Significance	Issue Description			Comments	
	Monitoring Report	Possible non conformance. May impact conformance; no materiality issue	<p>As discussed on the October 3, 2022 kickoff call, verifiers understand the ACR Standard listed in the Monitoring Report (Section 2, line 9) needs to reflect the latest version of the ACR Standard. This is based on recent ACR guidance (W.Reed; Sept 22, 2022), which is pasted below:</p> <p>“Projects are subject to eligibility rules of the standard version they list under, but everything else is subject to latest version. To reiterate, projects are always subject to the latest version of the ACR Standard (7.0 currently). This differs from the methodology version. Methodology versions (for example, IFM v1.3 vs newly updated IFM v2.0) are locked in at the time of Validation.”</p> <p>Also, the Monitoring Report (Section V), the description for the monitoring parameter “Forest Carbon” states: “Carbon stores in above and below ground live trees at the beginning of the year t”. As dead trees are included in the project’s forest carbon, this sentence needs to be revised to reflect this.</p> <p>Please review and update the Monitoring Report as appropriate.</p>			DRAFT_ShaanSeet_RP3_MonitoringReport_09_19_22	
			<p><b>October 25, 2022 Findings</b></p> <p>The updated Monitoring Report (10/18/22) has been revised to reflect the most current ACR Standard Version (Standard v7.0; Section 2, line 9) and to include standing dead wood in the description for the monitoring parameter “Forest Carbon”. This issue is closed.</p>			DRAFT_ShaanSeet_RP3_MonitoringReport_10_18_22	
PP Response							
Date	PP Comment					Additional evidence submitted for review by PP	
10-Oct-22	The Relevant ACR Standard Version was updated in the Monitoring Report (Section 2, line 9).					DRAFT_ShaanSeet_RP3_MonitoringReport_10_18_22	
	The description for the monitoring parameter “Forest Carbon” was updated to include standing dead wood.						

Verifier Issue	Issue ID:	22-2	Status:	Closed	Checked by:	BS	Date Identified	4-Oct-22
ACR Standard ref	GHG Plan Section	Significance	Issue Description					Comments
	Monitoring Report	Possible non conformance. <i>May impact conformance; no materiality issue</i>	Verifiers note the Monitoring Report submitted is based on ACR’s version 3.0 form. Please update to the latest MR form version (v4.0, May 2022).					<i>DRAFT_ShaanSeet_RP3_MonitoringReport_09_19_22</i>
			<u>October 25, 2022 Findings</u> The revised Monitoring Report has been updated to the latest ACR form version (MR v4.0, May 2022). This issue is closed.					<i>DRAFT_ShaanSeet_RP3_MonitoringReport_10_18_22</i>
PP Response								
Date	PP Comment					Additional evidence submitted for review by PP		
10-Oct-22	The Monitoring Report has been updated to the latest MR form version (v4.0, May 2022).					<i>DRAFT_ShaanSeet_RP3_MonitoringReport_10_18_22</i>		

Verifier Issue		Issue ID:	22-3	Status:	Closed	Checked by:	BS	Date Identified	4-Oct-22
ACR Standard ref	GHG Plan Section	Significance	Issue Description			Comments			
	Monitoring Report	Clarification. <i>May impact materiality or conformance.</i>	There is a 1 tCO <sub>2</sub> e discrepancy in the total project stocks reported between the Monitoring Report (Section IV- carbon pools & Section VI-project emissions) and the ERT workbook (cells g19 & g20, tab "ACR IFM ERT Calcs").  Another potential discrepancy: The Monitoring Report (Section VI, project emissions) states: "No burning of any kind took place in the project area. Thus, parameter BSP equals zero and the outcome of equation 13 of the methodology, parameter GHGP, equals zero." The ERT workbook (cell g22, tab "ACR IFM ERT Calcs"), however, shows a value of 1 for burning of logging slash.  Lastly, in the Monitoring Report (Section VI, project emissions, item 2, step 3) the PP notes the inventory tree list was grown forward 2.9 years from the inventory date 5/15/19 to the end of the reporting period (1/9/2022). In the CO <sub>2</sub> Calc workbook, the formula used to calculate the growing seasons for estimating growth (e.g., D2),			DRAFT_ShaaS e e t _ R P 3 _ M o n i t o r i n g R e p o r t _ 0 9 _ 1 9 _ 2 2  ShaaS e e t _ R P 3 _ E R T _ H W P _ 0 7 _ 2 8 _ 2 2  ShaaS e e t _ R P 3 _ C O 2 _ C a l c _ 0 7 _ 2 1 _ 2 2			

		<p>specifically for year 2021, includes the year's growth percentage for May, June, July &amp; August. While it does change the total grow forward years (2.9), shouldn't this formula include half of May, June, July, August &amp; September?</p> <p>Please review, clarify, and revise as appropriate.</p>	
		<p><b>October 25, 2022 Findings</b></p> <p>To clarify the 1 tCO<sub>2</sub>e discrepancy between total project stocks values reported in the ERT workbook and Monitoring Report, the PP has revised the Monitoring Report (Section IV) by including both the AG live and BG live. Verifiers note the discrepancy is due to summing the rounded AG live and BG live values to the nearest integer in reporting the total project stocks in the MR. Verifiers concur with the PP's revision as it provides the needed clarification in the MR while retaining conservatism in calculating and reporting the ERTs (i.e., calculations based on the decimal values for the live &amp; dead project stocks).</p> <p>The revised ERT workbook Monitoring Report now shows zero for the burning of logging slash (cell g22, tab "ACR IFM ERT Calcs") which aligns with the lack of project harvesting noted in the Monitoring Report (Section VI, project emissions).</p> <p>The formula used to calculate the growing seasons for estimating growth in the revised CO<sub>2</sub> Calcs workbook (tab "InvDate" cell D2, for example) has been updated to include half of May, June, July, August &amp; September. The total grown forward years remains the same (2.9 years).</p> <p>The PP has made the needed revisions and clarifications to the noted project documents; these issue items are considered closed.</p>	<p><i>DRAFT_ShaanSeet_RP3_MonitoringReport_10_18_22</i></p> <p><i>ShaanSeet_RP3_ERT_HWP_10_18_22</i></p> <p><i>ShaanSeet_RP3_CO2_Calc_10_18_22I</i></p>
<b>PP Response</b>			
<b>Date</b>	<b>PP Comment</b>	<b>Additional evidence submitted for review by PP</b>	
<b>10-Oct-22</b>	<p>We did not note a similar 1 tonne discrepancy in the total project stocks reported between the Monitoring Report (Section IV- carbon pools &amp; Section VI-project emissions) and the ERT workbook (cells g19 &amp; g20, tab "ACR IFM ERT Calcs"); however, in updating to the latest MR template we did revise the values in Section IV to instead report AG Live and BG Live as opposed to total live.</p> <p>The value of 1 in the ERT workbook (cell g22, tab "ACR IFM ERT Calcs") has been updated to show a value of 0 for burning of logging slash. Changes to any ERT values as a result of this update are reflected in the monitoring report.</p> <p>The formula used to calculate the growing seasons for estimating growth in the CO<sub>2</sub> Calcs workbook (tab "InvDate" cell D2, for example) has been updated to include half of May, June, July, August &amp; September.</p>	<p><i>DRAFT_ShaanSeet_RP3_MonitoringReport_10_18_22</i></p> <p><i>ShaanSeet_RP3_ERT_HWP_10_18_22</i></p> <p><i>ShaanSeet_RP3_CO2_Calc_10_18_22</i></p>	

Verifier Issue	Issue ID:	22-4	Status:	Closed	Checked by:	BS	Date Identified	6-Oct-22
ACR Standard ref	GHG Plan Section	Significance	Issue Description					Comments
Standard (5.A); Verif/Valid (8.B)	Monitoring Report	New information request. May impact materiality or conformance.	In the Monitoring Report (Section VI, item 4), the buffer contribution is listed at 16%. This Permanence risk rating assessment was completed in RP1 (Section B8 of the GHG Plan) using the ACR Tool for Risk Analysis and Buffer Determination (v1.0). As some of the risks may change overtime, verifiers are requesting the risk rating assessment that was completed for RP3. One such change may result from insect infestation. For example, according to the USDA Forest Health Report (Alaska 2021), verifiers understand some forest health issues may exist near or within the project area (e.g., western blackheaded budworm impacts on hemlock and spruce). Depending on extent and damage, these recent infestations may affect the project stocks and the associated risk rating.					DRAFT_ShaanSeet_RP3_MonitoringReport_09_19_22  ShaanSeet_GHG Plan_03_09_21
			<u>October 26, 2022 Findings</u> Due to potential insect infestation and/or disease conditions within or near the project area, the PP has updated the total risk rating, increasing it from 16% in RP2 to 20% for RP3. Verifiers concur with this update. The updated risk rating has been incorporated in the revised ERT workbook and Monitoring Report.  Before this issue can be closed, verifiers request the various risk category ratings and calculation be provided for the updated total risk rating. This can be shown within the ERT workbook, Monitoring Report and/or an updated ACR Tool for Risk Analysis and Buffer Determination (v1.0).					DRAFT_ShaanSeet_RP3_MonitoringReport_10_18_22  ShaanSeet_RP3_ERT_HWP_10_18_22
			<u>November 4, 2022 Findings</u> The PP has provided the requested revised permanence risk rating (i.e., ACR Tool for Risk Analysis). Verifiers concur with the calculations in assessing the 20% risk rating. This issue is now closed.					ShaanSeet_RP3_RiskScore_10_31_22
PP Response								
Date	PP Comment					Additional evidence submitted for review by PP		
10-Oct-22	After checking US Forest Service Insect and Disease Maps, it was determined that some forest health insects or diseases have occurred near or within the project area. The risk rating for RP3 was updated to reflect this observation, for a total risk score of 20%. The ShaanSeet_RP3_ERT_HWP workbook and Monitoring Report have been updated to reflect this.					DRAFT_ShaanSeet_RP3_MonitoringReport_10_18_22  ShaanSeet_RP3_ERT_HWP_10_18_22		
31-Oct-22	An updated ACR Tool for Risk Analysis and Buffer Determination v1.0 (“ShaanSeet RP3 RiskScore 10 31 22”) has been provided.					ShaanSeet_RP3_RiskScore_10_31_22		



Verifier Issue	Issue ID:	22-5	Status: Closed	Checked by: BS	Date Identified	6-Oct-22
ACR Standard ref	GHG Plan Section	Significance	Issue Description		Comments	
IFM v1.2, (D8)	Monitoring Report & ERT workbook	Non conformance. <i>May impact materiality or conformance.</i>	<p>Verifiers recalculated the Project Uncertainty (equation 18, IFM methodology) and found a discrepancy with the PP's value provided in the ERT workbook (tab "ACR IFM ERT Calcs", cell G26 and the Monitoring Report-Section VI). The discrepancy may be related to the inventory values used for live and dead stocks.</p> <p>Please review and revise as appropriate.</p>		<p><i>DRAFT_ShaaS e e t _ R P 3 _ M o n i t o r i n g R e p o r t _ 0 9 _ 1 9 _ 2 2</i></p> <p><i>S h a a n S e e t _ R P 3 _ E R T _ H W P _ 0 7 _ 2 8 _ 2 2</i></p>	
			<p><b>October 26, 2022 Findings</b></p> <p>Verifiers agree the baseline uncertainty will continue to use the original project inventory uncertainty.</p> <p>However, for Project Uncertainty (cell G26 in the ERT workbook) our understanding it is calculated using Equation 18 in the IFM methodology:</p> $UNC_{P,t} = \frac{\sqrt{(C_{P,TREE,t} \cdot e_{P,TREE})^2 + (C_{P,DEAD,t} \cdot e_{P,DEAD})^2 + (C_{P,HWP,t} \cdot e_{P,TREE})^2 + (GHG_{P,t} \cdot e_{P,TREE})^2}}{C_{P,TREE,t} + C_{P,DEAD,t} + C_{P,HWP,t} + GHG_{P,t}} \quad (18)$ <p>Where <i>ep,tree</i> &amp; <i>ep,dead</i> values are determined based on the last remeasurement of the inventory (RP1) as specified for Equation 18:</p> <p><i>ep,tree</i>      Percentage uncertainty expressed as 90% confidence interval percentage of the mean of the carbon stock in above and below ground live trees (in metric tons CO<sub>2</sub>) <b>for the last remeasurement of the inventory prior to year t.</b></p> <p><i>ep,dead</i>      Percentage uncertainty expressed as 90% confidence interval percentage of the mean of the carbon stock in dead wood (in metric tons CO<sub>2</sub>) <b>for the last remeasurement of the inventory prior to year t.</b></p> <p>Verifiers are unclear what ACR template is being referenced by the PP to support using the percentage uncertainty of the modeled tree list for <i>ep,tree</i> &amp; <i>ep,dead</i> for RP3.</p> <p>Please review, clarify and/or revise as needed.</p>		<p><i>S h a a n S e e t _ R P 3 _ E R T _ H W P _ 1 0 _ 1 8 _ 2 2</i></p>	
			<p><b>November 4, 2022 Findings</b></p> <p>The PP has revised the project uncertainty (cell G26 in the ERT workbook) in accordance with Equation 18 in the IFM methodology by using <i>ep,tree</i> &amp; <i>ep,dead</i> from the initial inventory (cells D2 and D3 in the ERT workbook). This revised value</p>		<p><i>S h a a n S e e t _ R P 3 _ E R T _ H W P _ 1 1 _ 3 _ 2 2 . x l s</i></p> <p><i>D R A F T _ S h a a n S e e t _ R P 3 _ M o n i t o r i n g R e p o r t _ 1 1 _ 3 _ 2 2 . p d f</i></p>	

		has been incorporated into the revised ERT workbook and monitoring report. This issue is now closed.	
<b>PP Response</b>			
<b>Date</b>	<b>PP Comment</b>	<b>Additional evidence submitted for review by PP</b>	
<b>10-Oct-22</b>	As guided by ACR's template, we calculate project uncertainty using the current RP stocking. Therefore, our RP3 uncertainty calculations are in-line with the updated grown-forward RP3 stocking and will not match RP1 or RP2 uncertainty. The baseline uncertainty will continue to use the original project inventory uncertainty.		
<b>03-Nov-22</b>	The project uncertainty (cell G26 in the ERT workbook) has been updated in accordance with Equation 18 in the IFM methodology by using ep,tree & ep,dead from the initial inventory (cells D2 and D3 in the ERT workbook). An updated ERT workbook and monitoring report with associated updated values have been provided.	<i>ShaanSeet_RP3_ERT_HWP_11_3_22.xls</i> <i>DRAFT_ShaanSeet_RP3_MonitoringReport_11_3_22.pdf</i>	

## Appendix C: Project Team

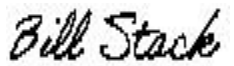

Verification Team	Qualifications
Bill Stack	<p>Bill Stack is a forester, natural resource manager, and ecosystem restoration specialist with over 29 years experience working on forest and aquatic ecosystems in the northeast and northwest US. He holds a master's degree in Forest Engineering from Oregon State University. He is an ARB accredited lead verifier and forest project specialist. Bill has participated on the verification of forest offset projects throughout the US including Alaska. Verification responsibilities included pre-site visit prep, forest inventory, data processing and analysis, developing findings, and report writing.</p> <p>Bill also provides a broad range of forest management consultation services to private landowners in preparing and implementing ecologically-based forest stewardship plans. He holds professional forester licenses in New Hampshire and Vermont. His comprehensive approach balances water, soil, wildlife, timber, recreation, aesthetics, and other resources with landowner goals and values.</p> <p>Previously, Bill has worked as a Senior Project Scientist with Stantec consulting on ecosystem restoration projects and as a Forest Hydrologist on interdisciplinary project teams for the USDA Forest Service.</p>
Robert Turner	<p>Robert Turner holds a BS in finance and a MS in forest management. He brings over 25 years of experience in forest management consulting, primarily in the northeastern US. This experience spans a broad range of technical and analytical services, often related to forest inventory and management planning, mensuration, growth and yield modeling, financial modeling, information and decision support systems, and spatial analysis. His expertise in long-term timber supply modeling has supported state and regional forest policy in all the states of the Northern Forest. Robert gained accreditation (expired) as a lead verifier by ARB and CAR under their Forest and Urban Forest protocols and has been a verifier/biometrician on sixteen forest carbon projects under CAR, ARB &amp; VCS standards.</p> <p>Robert joined S&amp;A Carbon in June of 2015. As a Senior Auditor, he is responsible for leading assessments of GHG projects under various carbon offset standards, including the California Air Resources Board.</p>
Elizabeth McGarrigle	<p>Elizabeth McGarrigle holds three forestry degrees (BScF, MScF, PhD). Her work has focused on forest inventory, growth and yield, and forest management planning. Her research focused on examining the impact of uncertainties in the inputs to long term forest management plans when optimization models are employed during the Master's program. While completing her PhD, she was part of the team developing a regional growth and yield model for the Acadian forest in the Northeastern United States and Canada. She developed a stand level model that is used to</p>

Verification Team	Qualifications
	predict survivor growth, ingrowth, and mortality in the region. As part of her dissertation, she focused on several variants of the Forest Vegetation Simulator and several regional growth and yield models from across Canada and the United States. Dr. McGarrigle is currently working with the provincial government in Nova Scotia Canada as a Forest Inventory Data Analyst where she is responsible for the design and analyses of permanent sample plots. In addition to her work as a biometrician on several ARB forest projects, she has also been involved in research at Natural Resources Canada using a fine scale forestry model to assess the impact of climate change on species composition in forest types across Canada.
Alexa Kandarīs	Alexa Kandarīs has 6 years' experience in carbon auditing and climate change mitigation policy and is accredited by ARB as a lead verifier under their US Forests protocol and the Ozone Depleting Substances protocol, and by the Climate Action Reserve (CAR) as a lead verifier. In this time, she has participated in verifications of carbon offset projects and corporate inventories under a variety of GHG programs, including the Air Resources Board, Climate Action Reserve, American Carbon Registry, Verified Carbon Standard/Climate Community & Biodiversity Standard, and Carbon Disclosure Project. Alexa developed tracking systems for a program registered under the Clean Development Mechanism and registered with the Gold Standard. Alexa is currently responsible for implementation of S&A's corporate management system to ensure ongoing improvement and compliance with ISO requirements. In addition to this, she has field experience with Forestry, Ozone Depleting Substances, and Livestock verification projects. She holds a Bachelor of Arts in Economics with a focus on natural resource and environmental Economics.
Marty Duffany	Martin Duffany holds a BS in Forestry from SUNY College of Environmental Science and Forestry. He brings over 35 years of experience in forest management working for forest industry and Timberland Investment Organizations (TIMOs) primarily in the northeastern and Appalachian regions of the US and eastern Canada. This experience focuses mainly on managing all aspects of forest inventory and mapping projects but includes extensive work in forest management planning, modeling and analysis. He has years of experience working in compliance with FSC and SFI certification standards and protocols. Martin joined S&A Carbon in February 2019 as a contractor providing support on desk and field verification projects. He is an SAF Certified Forester and holds forester licenses in Maine, New Hampshire and Vermont.
Kyle Silon	Kyle Silon holds an M.S. in Energy and Environmental Economics. He has ten years' experience in climate change mitigation strategies and carbon reduction projects. Prior to founding S&A, he worked for a leading international certification company, specializing in validation and

Verification Team	Qualifications
	verification of small-scale household energy demand projects (such as cook stove and water filter projects), primarily located in South America, Asia, and Africa. He has participated in numerous verifications of forestry, landfill, and livestock projects, and has worked across all major GHG programs, including the Air Resources Board, Verified Carbon Standard, Climate Action Reserve, American Carbon Registry, Gold Standard, and Clean Development Mechanism (CDM).

#### Appendix D: Version Tracking

Version	Date	Developed By	Version Notes
1.0	11/4/2022	Bill Stack	Draft Report
1.1	11/9/2022	Alexa Kandarlis	Technical Review (under observation)
1.2	11/13/2022	Robert Turner	Technical Review
1.3	11/14/2022	Bill Stack	Final Report- updated based on Technical Review comments
1.4	11/17/2022	Bill Stack	Final Report- updated based on PP review comments
1.5	12/16/2022	Bill Stack	Finalized upon signed MR being provided
2.0	1/19/2023	Bill Stack	Updated based on ACR Review comments

S&A Carbon Lead Verifier	Bill Stack
Name and Signature:	
S&A Carbon Technical Reviewer	Robert Turner
Name and Signature:	
Date:	1/19/2023