



&



Validation and Verification Report

ACR637 ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project

June 1, 2022

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1 INTRODUCTION

The Indian Land Tenure Foundation (ILTF) contracted with Ruby Canyon Environmental, Inc. (RCE) to perform the validation and verification of the ACR637 ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project (Project) for the reporting period of February 13, 2019 – June 30, 2021 and a crediting period of February 13, 2019 – February 12, 2039 under the American Carbon Registry (ACR) program. ILTF acts the project proponent for the landowner, Keweenaw Bay Indian Community (KBIC). Spatial Informatics Group, LLC (SIG) acts as the project developer and manages the Project through the validation and verification process.

This report is documentation of validation and verification activities that RCE performed for the Project. For the validation, RCE reviewed the project information as described in the Project Plan “ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project, Greenhouse Gas Plan, Version 1.1, February 14, 2022”. For the verification, RCE ensured that the GHG assertion was materially correct, that the data provided to RCE was well documented, and that if ILTF and SIG made any material errors, that these errors were corrected.

RCE worked with Forest Resource Solutions and Technologies (FRST) to complete this validation and verification.

1.1 OBJECTIVES

The objectives of the validation are to evaluate:

- Conformance to the ACR standard and the approved ACR Methodology for Improved Forest Management (Methodology);
- GHG emissions reduction project planning information and documentation in accordance with the applicable ACR-approved methodology, including the project description, baseline, eligibility criteria, monitoring and reporting procedures, and quality assurance/quality control (QA/QC) procedures;
- Reported GHG baseline, ex ante estimated project emissions and emissions reductions/removal enhancements, leakage assessment, and impermanence risk assessment and mitigation (if applicable).

The objectives of the verification are to evaluate:

- The emissions reductions and to ensure that the assertion is materially correct;
- The data provided to RCE can be documented and if errors or omissions are detected, they be corrected

RCE retains all data and documents for seven years after the end of the project reporting period or for the duration required by ACR, whichever is longer.

1.2 PROJECT BACKGROUND

The Project area is located on 15,356 acres of upland forests in the Upper Peninsula of Michigan.

The Keweenaw Bay Indian Community was established under the 1936 Treaty with the United States Government. It is one of the four original member tribes in Michigan that founded the Inter-Tribal Council of Michigan, Inc.

The Keweenaw Bay Indian Community Forest Carbon Project is situated within 18,811 acres of tribal land, of which approximately 16,500 acres is forested. By committing to maintain forest CO₂ stocks above the regional baseline, the project will provide significant climate benefits through carbon sequestration.

1.3 RESPONSIBLE PARTIES

Project Proponent

Indian Land Tenure Foundation
151 County Road B2E
Little Canada, Minnesota 55117
Bryan Van Stippen, NICC Program Director
Phone: 651-789-1744

Project Developer

Spatial Informatics Group, LLC.
2529 Yolanda Ct.
Pleasanton, CA 94566
Charles Kerchner, Carbon Domain Manager
Phone: 802-999-6986

1.4 VALIDATION AND VERIFICATION TEAM

Lead Validator and Verifier: Zach Eyler
Biometrician: Andrea Eggleton, FRST
Professional Forester: Christian Eggleton, FRST
Forestry Analyst: Tim Facemire, FRST
Internal Reviewer: Phillip Cunningham

1.5 VALIDATION AND VERIFICATION CRITERIA

1.5.1 Validation and Verification Standards, Guidelines, and Tools

- ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project, Greenhouse Gas Plan, Version 1.1 (February 28, 2022)
- ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project Monitoring Report (February 28, 2022)
- ACR Standard, Version 7.0 (December 2020)

- ACR Validation and Verification Standard Version 1.1 (May 2018)
- Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non - Federal U.S. Forestlands v.1.3, April 2018
- Errata and Clarifications - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non - Federal U.S. Forestlands v.1.3, September 30, 2021
- ISO 14064-3:2006 “Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions”

1.5.2 Level of Assurance

The verification was conducted to a reasonable level of assurance.

1.5.3 Materiality

The verification was conducted to ACR’s required materiality threshold of +/-5% of the GHG project’s emissions reductions or removal enhancements.

2 VALIDATION AND VERIFICATION PROCESS

As the first step in validation/verification activities, the Lead Validator/Verifier developed a Validation/Verification Plan to be followed throughout the validation and verification. The plan included the following activities:

- RCE completed a COI form on June 28, 2021 to identify any potential conflict of interest with the Project or Project Developer. The COI form was approved by ACR on July 6, 2021.
- RCE, FRST and SIG held a validation/verification kick-off meeting on July 7, 2021. During the kick-off meeting RCE reviewed the validation/verification objectives and process, reviewed the schedule, and submitted an initial document request.
- RCE performed a strategic review and risk assessment of the received data and support documents to understand the scope and areas of potential risk in the GHG emissions reductions.
- RCE developed a risk-based sampling plan based upon the strategic review and risk assessment. The validation/verification plan and sampling plan were used throughout the process and were revised as needed based upon additional risk assessments.
- The validation/verification team conducted the site visit to the Project to verify the inventory quality and forest management practices on July 27-28, 2021. During the site visit the Verification Team performed key personnel interviews, conducted sequential sampling of inventory plots, conducted reconnaissance of the Project area boundary, observed elements of natural forest management, and observed harvest locations (if applicable) during and preceding the reporting period.
 - The site visit was attended by the following verification team personnel:
 - FRST:
 - Tim Facemire
 - During the site visit, the Verification team met with the following individuals:

- ILTF
 - Bryan Van Stippen
 - Green Timber Forestry
 - Justin Miller
- RCE performed a risk-based desktop review of the submitted validation/verification documents. The desktop review included an assessment of the GHG calculation methods and inputs, source data completeness, GHG management and monitoring systems and eligibility documentation.
- RCE conducted interviews and had conversations with Project personnel during the verification. Personnel interviewed include:
 - Tim Kramer – SIG
 - Paul Cousar – SIG
- RCE submitted requests for corrective actions, non-material findings, additional documentation, and clarifications as necessary to ILTF and SIG throughout the validation/verification.
- RCE’s internal reviewer conducted a review of the validation/verification sampling, report, and statement.
- RCE issued a final validation/verification report, verification statement, and List of Findings.
- RCE and FRST held an exit meeting with SIG.

3 VALIDATION AND VERIFICATION FINDINGS

3.1 PROJECT BOUNDARY AND ACTIVITIES

The Project area is located on 15,356 acres of upland forests in the Upper Peninsula of Michigan. GHG emission reductions for the Project are quantified by comparing actual onsite carbon stocks against modeled baseline onsite carbon stocks and baseline carbon in harvested wood products. The difference in these Project and baseline carbon stocks year over year is the basis for calculating the Project’s primary goal of maintaining and enhancing forest GHG pools.

The Project’s temporal boundary is the crediting period from February 13, 2019 – February 12, 2039.

3.2 GHG SOURCES SINKS, AND RESERVOIRS

Table 1 shows the GHG emission sources included in the project boundary based on the Methodology. RCE confirmed that the Project Plan appropriately identifies the offset project boundary and includes all relevant SSRs.

Table 1. GHG Emissions Sources

| Source | GHG | Description |
|-----------------------|-----------------|--|
| Above-ground biomass | CO ₂ | Major carbon pool for project activity |
| Below-ground biomass | CO ₂ | Major carbon pool for project activity |
| Standing dead wood | CO ₂ | Major carbon pool in unmanaged stands for the project activity |
| Harvest wood products | CO ₂ | Major carbon pool for project activity |
| Market Effects | CO ₂ | Reductions in project outputs due to project activity may be compensated by other entities in the marketplace. Those emissions must be included in the quantification of project benefits. |

3.3 ELIGIBILITY

3.3.1 ACR Eligibility

RCE confirmed the following ACR eligibility criteria listed in the ACR Standard, Version 7.0 by reviewing the project proponent's Project Plan, Monitoring Report, and calculations as well as other supporting documentation described throughout this report (a full list of documents reviewed is in Appendix A).

- Start Date: The project start date is February 13, 2019.
- Minimum Project Term: The minimum project term is 40 years.
- Crediting Period: The crediting period is 20 years as specified by the Methodology, February 13, 2019 – February 12, 2039.
- Real: RCE confirmed that the GHG reductions follow the ACR methodology and are verifiable.
- Emission or Removal Origin: RCE confirmed that KBIC and ILTF own and has control over, or document effective control over the GHG sources/sinks from which the emissions reductions or removals originate.
- Offset Title: RCE confirmed that title to all emission reductions from the Project are owned by the Project Proponent (ILTF).
- Additional: RCE confirmed that the project is additional as described in Section 3.4.
- Regulatory Compliance: RCE confirmed that the Project was in compliance with all applicable regulations.
- Permanent: RCE confirmed that the Project correctly applied the ACR Tool for Risk Analysis and Buffer Determination to account for permanence. A total risk score of 16% was confirmed.
- Net of Leakage: RCE confirmed that the Project correctly accounted for leakage per the Methodology.
- Independently Validated and Verified: RCE is a third-party validation and verification body that the project proponent has contracted to validate and verify the Project.
- Environmental and Community Assessments: RCE reviewed project impacts as described in section 3.6 of this report.

3.3.2 Methodology Eligibility

RCE reviewed the Project against the ACR Methodology eligibility and applicability conditions and confirmed the following:

- The Project is on lands not federally owned.
- KBIC controls the timber rights on the forestland and can legally harvest.
- The Project does not have commercial timber harvesting occurring on or after the project start date.
- The Project is on tribal lands.
- The Project is not on public non-federal lands.
- The Project does not use non-native species where adequately stocked native stands were converted for forestry or other land uses after 1997.
- The Project has not drained or flooded wetlands on or after the project start date.
- KBIC owns the land and timber rights and transferred all carbon credit title to ILTF.
- The Project's stocking levels will increase well above the baseline conditions for the duration of the Project and by the end of the Crediting Period.

3.4 ADDITIONALITY

The Project meets the requirements for the demonstration of additionality specified by the ACR Standard and the Methodology.

3.4.1 Regulatory Surplus Test

RCE confirmed that there are no existing laws, regulations, statutes, legal rulings, or other regulatory frameworks in effect as of the start date that requires the Project activity and the associated GHG emissions reductions; thus the Project passes the regulatory surplus test.

3.4.2 Common Practice Test

The Project area is most similar to industrial forestland, which is most common for private lands in the region. Private land is typically heavily clearcut to maximize NPV. With Project implementation the forestland carbon stocks will exceed the common practice found in the region.

3.4.3 Implementation Barriers Test

The Project chose to assess the financial barriers test per the ACR Standard and Methodology. RCE confirmed that carbon funding is reasonably expected to incentivize the Project's implementation. Due to the Project being implemented, KBIC loses the ability to monetize timber harvests during the life of the Project. SIG provided a financial assessment comparison of NPV between the baseline scenario with harvesting and the project scenario without harvesting but including revenue from carbon credits. Without carbon funding the project scenario NPV is zero compared to a positive NPV for the baseline scenario with harvesting.

3.5 PERMANENCE

RCE confirmed that the Project correctly applied the ACR Tool for Risk Analysis and Buffer Determination to account for permanence. A total risk score of 16% was confirmed.

3.6 LEAKAGE

RCE and FRST confirmed that the Project correctly accounted for leakage. The Project demonstrated that there is no activity-shifting leakage since there is an entity-wide management certification that covers all entity owned lands. The Project also correctly accounted for market leakage per the Methodology – since wood products decreased by greater than 25%, the market leakage is 40%.

3.7 ENVIRONMENTAL AND COMMUNITY IMPACTS

The Project Plan includes a summary of the Project activity's net positive environmental and community impacts. The Project will provide environmental benefits including carbon sequestration, habitat protection for wildlife, trees, and plant species, water quality protection, and reduced soil erosion. The Project is not expected to cause any negative environmental impacts.

Sustainable Development Goals

Table 2. SDGs

| Goal | Impact (+, -, N/A) | Rationale | RCE Conclusion |
|---|-----------------------|---|------------------------------------|
| GOAL 1: No Poverty | N/A | | Not included. |
| GOAL 2: Zero Hunger | N/A | | Not included. |
| GOAL 3: Good Health and Well-being | N/A | | Not included. |
| GOAL 4: Quality Education | N/A | | Not included. |
| GOAL 5: Gender Equality | N/A | | Not included. |
| GOAL 6: Clean Water and Sanitation | + | By maintaining forests and ensuring sustainable forest management the project reduces erosion and non-point source water pollution. | Project will provide this benefit. |
| GOAL 7: Affordable and Clean Energy | N/A | | Not included. |
| GOAL 8: Decent Work and Economic Growth | + | By maintaining forest, habitats, and recreational opportunities the project contributes to tourism, an important resource to the local economy. | Project will provide this benefit. |
| GOAL 9: Industry, Innovation and Infrastructure | + | The project provides a new revenue. | Project will provide this benefit. |
| GOAL 10: Reduced Inequality | N/A | | Not included. |
| GOAL 11: Sustainable Cities and Communities | + | By maintaining forests and ensuring sustainable forest | Project will provide this benefit. |

| | | | |
|---|-----|---|------------------------------------|
| | | management the project sustains the character and economic viability of local communities. | |
| GOAL 12: Responsible Consumption and Production | N/A | | Not included. |
| GOAL 13: Climate Action | + | By maintaining forest and ensuring sustainable forest management the project increases sequestration of carbon. | Project will provide this benefit. |
| GOAL 14: Life Below Water | N/A | | Not included. |
| GOAL 15: Life on Land | + | By maintaining forest and ensuring sustainable forest management the project protects habitat benefits both within the project area and the larger landscape. | Project will provide this benefit. |
| GOAL 16: Peace and Justice Strong Institutions | N/A | | Not included. |
| GOAL 17: Partnerships to achieve the Goal | N/A | | Not included. |

3.8 LOCAL STAKEHOLDER CONSULTATION

No formal stakeholder consultation occurred since the Project is held on private tribal lands.

3.9 MONITORING PLAN

The Project Plan includes a Monitoring Plan that identifies all monitored data and parameters. RCE confirmed that the monitoring parameters and approaches conform to the methods required by the Methodology. The plan includes all relevant data parameters and appropriately identifies units of measurements, data sources, methodologies, uncertainty, monitoring frequency and procedures, and QA/QC procedures. After discussions with SIG and reviews of project documents, RCE determined that the Monitoring Plan accurately reflects how Project data is monitored and recorded and there are no deviations relevant to the Project activity against the requirements of the Methodology. ILTF and SIG implemented the monitoring plan as stated in the Project Plan during Project activities.

3.10 BASELINE SCENARIO

The Project's baseline scenario represents harvest levels that maximize the net present value (NPV) at a 5% discount rate (for Tribal Land) subject to KBIC's existing harvest constraints, which limits harvest regimes to be more conservative than typical practices in the project region. The baseline also includes restrictions due to Michigan State Forest Practice Laws.

The Project's baseline model simulates a range of harvest types and rotation lengths based on legal requirements and simulated growth within each stratum. The objective of modeling was to determine

possible timber harvests in the project area over 100-years within the framework of legal and reasonable harvest constraints.

Stands were modeled for different prescriptions including no harvest and clearcut.

ILTF and SIG utilized the USDA's Forest Vegetation Simulator (FVS) Lake States variant to model harvests and yields. Growth models were calibrated using site index values obtained from tree cores of dominant/codominant species located in or close to project plots. With this site tree data, Carmean site index curves from GTR 88 and 128 were then used to calculate site specific indices to appropriately calibrate growth. The process was confirmed to be consistently and systematically applied to each plot.

RCE reviewed the resulting baseline outputs to ensure that they reflected the modeling objectives and the legal additionality requirements. The model grows trees and volumes at a reasonable rate compared to regional averages.

3.11 ON-SITE INVENTORY VERIFICATION CHECK

In preparation for and during the site visits, the Verification Team reviewed evidence necessary to verify Project inventory estimates.

The Project inventory consists of a single forested stratum. The Verification Team confirmed that stocking and vegetation were consistent with the description in the inventory data and the Project Plan. FRST chose plots per a random sampling method.

The current inventory contains 217 permanent, fixed-radius plots. At each plot location, trees were measured in two nested plots: a larger 1/24th acre plot with radius of 24 feet, and a smaller 1/300th acre plot with radius of 6.8 feet. The larger plot measured all trees greater than or equal to 5 inches DBH while the smaller, nested plot measured all living trees between 1-4.9 inches DBH.

Given this sample design and Project size, the Verification Team was required to achieve a minimum of eleven successful plots within the project to successfully verify inventory stocking levels. The Verification Team successfully verified site data after measuring a total of 12 site plots. The Project passed the t-test during the first site visit.

Project Area

During the site visit, the Verification Team conducted boundary-line reconnaissance by visiting Project boundary edge lines and points, plotting edge points with GPS receivers, and determining whether there were discrepancies with the digital Project boundary files provided by SIG and the physical boundary witnessed on-site. This was done to determine the risk that Project area inaccuracies could contribute to a material misstatement in Project emission reductions. To the extent feasible, the Verification Team confirmed that the Project area boundary was appropriate and accurate.

3.12 PROJECT DATA AND GHG EMISSIONS REDUCTION ASSERTION

RCE reviewed the Project Plan and Project data and calculations to ensure that appropriate equations were used in calculating baseline emissions, project emissions, and net emissions reductions.

3.12.1 Baseline Emissions

RCE and FRST confirmed that the baseline emissions were correctly calculated. See more detail in section 3.9.

3.12.2 Project Emissions

RCE and FRST confirmed that the project emissions were correctly calculated.

3.12.3 Emissions Reductions

RCE verified that SIG calculated emissions reductions according to relevant Methodology equations and that the methods are included in the Project Plan.

RCE and FRST assessed quantitative uncertainty of the emission reduction calculations and the methodologies and applicable data sets and sources. RCE and FRST confirmed that the Project has appropriate measures in place to address uncertainty and that the sampling error associated with the mean of the estimated emission reductions/removals was less than +/-10%. RCE and FRST also confirmed that all defaults, projections, and other data used were correct and consistent with expectations.

RCE recalculated emissions reductions for the first reporting period according to the equations defined in the Methodology and the Project Plan and found the Project assertion to be free of material misstatement.

4 VALIDATION AND VERIFICATION RESULTS

RCE developed a combined List of Findings for both the validation and verification. The List of Findings noted all corrective action requests (CARs), non-material findings (NMs), additional documentation requests (ADRs), clarification requests (CRs), and recommendations for improvement (RFI). ILTF and SIG appropriately responded to all items in the List of Findings. The List of Findings is provided as Appendix B.

5 VALIDATION AND VERIFICATION CONCLUSION

RCE conducted a risk-based validation and verification of the ILTF/NICC & SIG Keweenaw Bay Indian Community Forest Carbon Project that included a strategic review of the project data, documentation, and emission reduction calculations. The objective of the validation activities was to assess the project design, baseline scenario, and monitoring plan and to ensure compliance of the Project Plan to the assessment criteria defined in Section 1.5.1. The objective of the verification activities was to conduct an independent assessment of the Project's initial reporting period and resulting ex-post GHG emission reductions.

Based on the review and the historical evidence collected, RCE concludes to a reasonable level of assurance that the Project's GHG assertion is free of material misstatement. The emission reductions resulting from the reporting period February 13, 2019 – June 30, 2021 can be considered in conformance with the:

- ACR Standard, Version 7.0 (December 2020)

- ACR Validation and Verification Standard Version 1.1 (May 2018)
- Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non - Federal U.S. Forestlands v.1.3, April 2018
- Errata and Clarifications - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non - Federal U.S. Forestlands v.1.3, September 30, 2021
- ISO 14064-3:2006 “Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions”

Table 3 provides a summary of the emissions reductions.

Table 3. Total ERTs

| Vintage | Removal ERTs (mtCO ₂ e) | Other ERTs (mtCO ₂ e) | Net ERTs (mtCO ₂ e) | | Risk Buffer (mtCO ₂ e) | Total GHG Reductions and Removals (mtCO ₂ e) |
|--------------|------------------------------------|----------------------------------|--------------------------------|--|-----------------------------------|---|
| 2019 | 27,556 | 108,953 | 136,509 | | 26,002 | 162,511 |
| 2020 | 31,333 | 123,888 | 155,220 | | 29,566 | 184,787 |
| 2021 | 15,452 | 61,095 | 76,547 | | 14,581 | 91,128 |
| Total | 74,340 | 293,936 | 368,276 | | 70,149 | 438,425 |

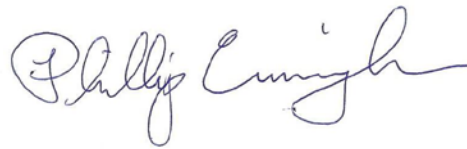
Note: Totals might not sum due to rounding.

Lead Verifier Signature



Zach Eyler

Internal Reviewer Signature



Phillip Cunningham

APPENDIX A—DOCUMENTS REVIEWED

1. ACR634_KBIC_GHGPlan_series
2. Buffers png
3. CarbonProjectTSRs
4. CulturalZones png
5. KBIC Carbon inventory manual_series
6. KBIC carbon project MOU [signed by all parties] (4)
7. fdl_carbon_tractlist_march2021
8. KBIC_DevelopmentData_20210930 geodatabase
9. KBIC_Geospatial20210817 geodatabase
10. KBIC_IRMP-101817
11. KBIC_Monitoring Report_RP1_series
12. KBIC_ProjectArea_20211117V2 geodatabase
13. KBIC_StrataData_20211013 geodatabase
14. KBIC_StumpageValues_Feb2021
15. KBICDevelopmentData_20210415 shapefiles
16. GTCF_KBIC_Audits
17. GTCF_KBIC_Carbon_TreeList_12-28-20
18. ILTF_KBIC_Carbon Agreement signed ILTF 2020.12.08 (1)
19. ILTF_KBIC_PC277_Invoice1001_1_9_2019
20. ncsn_northern_hardwoods
21. PC368_KBIC_Quant_Files_20210922
22. PC368_KBIC01_GIS_Acres_Plots_series
23. PC368_KBIC02_SiteIndexforPlots_series
24. PC368_KBIC03_FIA_BdFt_Defect_series
25. PC368_KBIC04_FVS_December2020_PlotAvgs_Strata_series
26. PC368_KBIC05_Degrowth_series
27. PC368_KBIC06_FVS_January2019_PlotAvgs_series
28. PC368_KBIC07_RxInputs_series
29. PC368_KBIC08_RxRegn_1YrMlts_series
30. PC368_KBIC08_RxRegn_5YrMlts_series
31. PC368_KBIC09_1Yrto5Yr_BAlmults_series
32. PC368_KBIC10_Stumpage_series
33. PC368_KBIC11_FVS_AvgDefect_series
34. PC368_KBIC12_LPA_Baseline_MaxNPV_series
35. PC368_KBIC13_LPA_NoCut_series
36. PC368_KBIC14_ERTs_Strata_MaxNPV_series
37. PC368_KBIC15_FVS_Dbs_Keys_outs series
38. PC368_KBIC16_Monitoring_Report_series
39. PC368_KBIC17_MerchPercentages_series
40. RipnAcres100 png
41. Rxs_CC1yr1stDecade_series
42. Rxs_CC1yrOtrDecades_series

- 43. Rxs_CC5yr_series
- 44. Rxs_Project_NoCut_series
- 45. Spatial Informatics Group, LLC Mail - Title Status Report - tribal ownership
- 46. StumpageDef_20211105.png
- 47. SusYldDef_A.png
- 48. Voluntary - Project Start Date

APPENDIX B—LIST OF FINDINGS

Includes Corrective Action Requests (CAR), Non-Material Findings (NMs), Additional Documentation Requests (ADR), and Clarification Requests (CR), as necessary.

