# American Carbon Registry (ACR)

# Wolf Lands Forest Carbon Project
# Validation/Verification Report

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| **Offset Project Name:** | Wolf Lands Forest Carbon Project |
| **ACR Project ID** | ACR628 |
| **American Carbon Registry Standard** | Version 7.0 |
| **Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands** | Version 1.3 |
| **Reporting Period:** | 20 May 2020 – 19 May 2021 |
| **Aster Global Project Number:** | 21080.00 |
| **Report Date:** | V2.1: 03 May 2023 |

| **Project Proponent:** | **Technical Consultant:** |
|---|---|
| **Name:** Wolf Lands, Inc.<br>**Contact:** Lloyd Purnell<br>**Phone:** (262) 695-1624<br>**Email:** skytyr2@aol.com<br>**Mailing Address:** PO Box 247 Butler, WI 53007 | **Name:** Spatial Informatics Group (SIG)<br>**Contact:** Ethel Wilkerson<br>**Email:** ewilkerson@sig-gis.com<br>**Secondary Contact**: Tim Kramer<br>**Email:** tkramer@sig-gis.com<br>**Mailing Address:** 2529 Yolanda Ct. Pleasanton, CA 94566 |

| **Offset Verification Body:** |
|---|
| Aster Global Environmental Solutions, Inc.<br>3800 Clermont St. NE<br>North Lawrence, Ohio 44666<br>330-294-1245 |

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# 1 Executive Summary

Aster Global Environmental Solutions, Inc., (Aster Global) prepared this validation and verification report in accordance with the outlined requirements of the American Carbon Registry's (ACR) Standard. Aster Global presents verification findings of the Wolf Lands Forest Carbon Project (hereafter, referred to as "*Project*") – prepared by Wolf Lands, Inc. (hereafter referred to as "*Project Proponent*") and Spatial Informatics Group (SIG). The project validation and verification was conducted as part of ACR's program requirements for GHG offset projects.

By ACR definition, the project is considered an improved forest management project (IFM). Project lands are located within Richland County, Wisconsin; Ontonagon County, Michigan; and Lake and St. Louis Counties, Minnesota. As stated in Section A5 of the GHG Project Plan, the project uses Improved Forest Management practices to increase carbon storage and conservation value by forgoing a higher financial return and more aggressive management regimes of industrial private lands in the region, which are characterized by shorter, even-aged rotations.

The GHG Project Plan validation and implementation verification included carbon sequestered through IFM on multiple non-contiguous parcels (approximately 11,275 acres). The project asserts net emissions reductions of 56,774 $MtCO_2e$ for the reporting period (20 May 2020 – 19 May 2021).

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

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

The GHG assertion provided by the *Project Proponent* and verified by Aster Global has resulted in the net emissions reductions of 56,774 $MtCO_2e$ by the project during the reporting period (20 May 2020 – 19 May 2021).

# 2 Introduction

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

The GHG Project Plan validation and implementation verification included carbon sequestered through IFM on aggregated parcels (approximately 11,275 acres). The project asserts the net emissions reductions of 56,774 $MtCO_2e$ for the reporting period (20 May 2020 – 19 May 2021).

## 2.1 Contact Information – Roles and Responsibilities

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|---|---|
| **Project Owner / Project Proponent:** | Wolf Lands, Inc.<br>Lloyd Purnell<br>262-695-1624<br>Skytyr2@aol.com<br>PO Box 247 Butler, WI 53007 |
| **Accredited V/V Body:** | Aster Global Environmental Solutions, Inc.<br>3800 Clermont St NW<br>North Lawrence, Ohio 44666 |
| **Validation/Verification Team** | Mansfield Fisher-Lead Validator/Verifier |
| | Shawn McMahon-Senior Internal Reviewer |
| | Matthew Campbell-Team Member |
| | Taek Joo Kim-Team Member |
| | Richard Scharf – Team Member |
| | Sandesh Shrestha-Team Member |
| | Caris Lyons-Team Member |
| | Caitlin Sellers-Team Member |
| | Matthew Perkowski-Team Member[1] |
| | Ashley Laux-Team Member/Trainee |
| | Janice McMahon – QA/QC |

## 2.2 Project Description

By ACR definition, the *Project* is considered an improved forest management project (IFM). Project lands are located in Richland County, Wisconsin; Ontonagon County, Michigan; and Lake and St. Louis Counties, Minnesota. As stated in Section A5 of the GHG Plan, the project uses

[1] Please note that Matthew Perkowski was originally denoted as the Lead Verifier for this project on the approved COI form submitted to ACR. Matthew Perkowski has subsequently left Aster Global. A new COI form has been submitted to ACR.

Improved Forest Management practices to increase carbon storage and conservation value by forgoing a higher financial return and more aggressive management regimes of industrial private lands in the region, which are characterized by shorter, even-aged rotations. The Baseline Scenario represents harvest levels that maximize the net present value (NPV) at a 5% (private non-industrial) discount rate (for non-governmental organizations) subject to Wolf Lands, Inc., existing harvest constraints.

## 2.3 Objective

The GHG Project Plan validation objectives included an assessment that the implementation of the GHG Project resulted in the GHG emission removals/enhancements as stated by the project developer (ISO 14064-3:2006). The objective was to also ensure the *Project* was in compliance with the ACR Standard and that Aster Global met the ACR Validation and Verification Standard criteria. The overall objective of verification was to assess Project's claimed GHG Emission reductions/removals against the relevant ACR Standard and the approved methodology.

## 2.4 Criteria

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

- *ACR Carbon Registry Standard (v7.0)*
- *ACR Validation and Verification Standard (v1.1)*
- *Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands (v1.3)*
- *ACR Tool for Risk Analysis and Buffer Determination (v1.1)*
- *Aggregation and Programmatic Development Approach Guidance for Improved Forest Management v1.0*

## 2.5 Scope

The scope of the validation/verification generally included the GHG Plan and Monitoring Report; eligibility criteria of the methodology; GHG project implementation scenario; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; and time periods covered. The geographic scope was defined by the project boundary, which included the carbon reservoir types, management activities, growth and yield models, inventory program, and contract periods. The scope of the *Project* is defined below.

| | |
|---|---|
| Baseline Scenario | The Baseline Scenario represents harvest levels that maximize the net present value (NPV) at a 5% (private non-industrial) discount rate (for non-governmental organizations) subject to Wolf Lands, Inc. existing harvest constraints. |

| | |
|---|---|
| Activities/ Technologies/ Processes | Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands version 1.3 |
| Sources/Sinks/ Reservoirs | Carbon Pools:<br>Above-ground biomass - Included<br>Below-ground biomass - Included<br>Standing dead wood - Included<br>Harvested wood products – Included<br>Lying dead wood – Excluded<br>Forest floor litter – Excluded<br>Soil organic carbon - Excluded<br><br>Sources:<br>Burning of biomass<br>Market leakage<br>Activity Shifting leakage |
| GHG Type | $CO_2$ and $CH_4$ |
| Project Location | Approximately 11,275 acres of forestland in Richland County, Wisconsin; Ontonagon County, Michigan; and Lake and St. Louis Counties, Minnesota |
| Project Boundary and Time Period | Project Start Date: 20 May 2020<br>Project Crediting Period: 20 May 2020 – 19 May 2040<br>Verification/Reporting Period: 20 May 2020 – 19 May 2021 |

## 2.6 Level of Assurance

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

## 2.7 Materiality

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

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

For this Monitoring Period, the calculation is as follows:

| **Materiality Threshold** | |
|---|---|
| **Contributions to Offset Materiality by Type ($mTCO_2e$):** | |
| Total reported GHG Reductions | 56,774 |
| *Project Emission Reduction Assertion* | 56,774 |
| *Verifier Emission Reduction Assertion* | 56,774 |
| [(56,774 – 56,774)/ 56,774] *100 | 0.00% |
| % Error | 0.00% |

As the percent error was less than 5%, the Validation and Verification Team confirms there is no offset material misstatement. The Issues Log, containing all information for determination of the offset material misstatement, has been compiled and is attached as Appendix A.

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

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

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

Related to the uncertainty assessment, the audit team also evaluated; "whether the project data and information supporting the GHG assertion were based on assumptions and industry defaults, future projections, and/or actual historical records (ACR Validation and Verification Standard v. 1.1 Chapter 12). It was determined that the project data and information supporting GHG assertions were of high quality. The project was confirmed to have adopted a sensible and appropriate approach to the grow forward for the inventory. Industry defaults were in line with the audit team's

expectations (e.g., $CO_2$ to Carbon biomass conversion factor of 3.664) and approved IFM methodology.

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

As an accredited VVB by the ANSI National Accreditation Board (ANAB) under ISO 14064-3 and 14065, Aster Global developed the Aster Global Management Systems Manual which provides the procedures, conditions, requirements, and specifically the QA/QC procedures under which Aster Global conducts validations and verifications. For this project specifically, Janice McMahon was responsible for all QA/QC for the project. Additionally, Shawn McMahon was designated as the Senior Internal Reviewer for this project. The Senior Internal Reviewer conducted a full review of all activities performed by the audit team during the course of the joint validation and verification to ensure the audit team followed all procedures that are outlined in the Aster Global Management Systems Manual.

## 3 Validation Process and Findings

### 3.1 Validation Process

The validation process closely followed the guidance provided by The American Carbon Registry Standard, the ACR Validation and Verification Standard, ISO14064-3, ISO 14065, and the Aster Global Management System and Management System Manual.

As defined by ISO 14064-3:2006 (E), "validation is the systematic, independent and documented process for the evaluation of a greenhouse gas assertion in a GHG project plan against agreed validation criteria." Specifically, the project validation included the review of the requirements outlined in the ACR Standard. The assessment included the following items: eligibility criteria, baseline approach, additionality, project boundary, emissions, leakage, selected methodology, data and parameters, monitoring plan design, the process of uncertainty determination and environmental impacts.

### 3.2 GHG Project Plan.

As part of the validation, Aster Global assessed the GHG Project Plan and found that the GHG Project Plan complies with ACR's Standard.

#### 3.2.1 ACR Standard Requirements/Eligibility

The project was found to be in compliance with ACR's project eligibility requirements set forth in ACR's Standard. Specifically, the GHG Project Plan outlined and described the following aspects of the project:

- The Project started in May 2020, which is after the earliest allowable start date of 01 January, 2000.
- The *Project Proponent* commits to a minimum project term of 40 years, meeting the ACR project term requirement.

- Only direct emission mitigation is counted.
- Ownership of offsets is clear.
- Ownership titling of land is clear.
- Project lands are eligible because they are eligible to be harvested by the *Project Proponent.*
- Project lands meet the definition of "forestland."

### 3.2.2 Approved Methodology

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

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

- The project occurs on non-federal U.S. forestlands.
- The project area is able to be harvested by the *Project Proponent*.
- There is clear title to land and timber rights.
- There is clear title to offsets.
- The Project is not subject to commercial timber harvesting at the Project Start Date in the with-project scenario.
- The Project does not occur on Tribal lands.
- There is no use of non-native species where adequately stocked native stands were converted for forestry or other land uses after 1997.
- The Project does not drain or flood wetlands.
- The Project demonstrated an increase in on-site stocking levels above the baseline condition by the end of the crediting period through an ex-ante modeling over the crediting period.

### 3.2.3 Programmatic Development Approach – General Requirements

The project utilized the programmatic development approach (PDA) as outlined in the ACR Standard v7.0 and ACR's guidance document Aggregation and Programmatic Development Approach Guidance for Improved Forest Management v1.0.

Aster Global confirms that the project meets the requirements for a PDA project under which the project was validated and verified:

- The Project is under the management of a single Project Proponent and listed under a single ACR account.
- All sites adhere to a single overarching project Start Date.
- The Initial Cohort has been validated within 3 years of the project Start Date.
- Appropriately assessed general and site-specific risk factors and applied a single risk rating at the PDA level.
- All sites within the initial cohort are on the same Validation and Verification schedule.
- Crediting Period requirements have been applied at the PDA level.
- The Project only uses one version of the methodology.

- The Project appropriately specified the PDA boundaries, baseline scenario, and MRV schedules within the GHG Plan.
- The Project has appropriately described in the GHG Plan a management system that includes all required elements.

### 3.3 Validation Findings and Conclusions

During initial validation, the Aster Global team identified non-conformity reports (NCRs) and clarifications (CL). All were addressed satisfactorily by the *Project Proponent* during the project validation process. These NCRs and CLs provided needed clarity to ensure that the GHG Project Plan was in compliance with ACR's Standard. Methodological equations and computational approach for uncertainty were examined and confirmed to be consistent with the detailed requirements of the methodology for the baseline and project scenarios and overall project computations.

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

Aster Global confirmed all validation activities including objectives, scope and criteria, level of assurance and the GHG Project Plan's adherence to the ACR Standard, as documented in the Validation Report, are complete. Aster Global concluded without any qualifications or limiting conditions that the Project meets the requirements of ACR's Standard.

## 4 Verification Process, Findings, and Conclusions

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

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

Aster Global's verification was generally broken down into four parts: desktop assessment, site visit quantitative review, and meetings/interviews.

### 4.1 Desktop Assessment

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

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

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

## 4.2 Site Visit

Following the initial desk review, Aster Global conducted an on-site assessment of the project lands on 07-10 April 2021. The site visit was used to review project records with representatives of the Project Proponent, discuss the calculation of carbon pools and sinks, visit random portions of the ownership for reconnaissance and ground-truth of the submitted data, and review the monitoring approach. The verification sample size of 13 plots included approximately 8% of the total inventoried plots.

During the site visit, the following plots were selected for remeasurement as part of field verification:

| Plots Visited | Stratum |
|---|---|
| 3 | OHFC Canopy_SAF 52: White Oak-Black Oak-Northern Red Oak |
| 7 | OHFC Canopy_SAF 52: White Oak-Black Oak-Northern Red Oak |
| 6 | OHFC Canopy_SAF 52: White Oak-Black Oak-Northern Red Oak |
| 152 | Open Canopy_Mixed Hardwood |
| 156 | Full Canopy_SAF 13: Black Spruce-Tamarack |
| 155 | OHFC Canopy_Mixed Conifer |
| 147 | Open Canopy_SAF 13: Black Spruce-Tamarack |
| 37 | High Canopy_Mixed Hardwood |

| | |
|---|---|
| 38 | Full Canopy_Mixed Hardwood |
| 53 | High Canopy_SAF 13: Black Spruce-Tamarack |
| 12 | High Canopy_Mixed Hardwood |
| 13 | High Canopy_Mixed Hardwood |
| 14 | High Canopy_Mixed Hardwood |

Field review included the following aspects:

- Accuracy of plot locations, including any plot relocation or dropping.
- Adherence to stratification rules outlined by the project's documentation.
- Adherence to plot measurements methods outlined by the project's documentation and alignment with common professional practice.
- Boundary delineation.
- Feasibility of the baseline scenario.

The plot remeasurements made by Aster Global were utilized to calculate carbon on the applicable pools. This was compared to the project's carbon stocks in a paired two sample t-test for means. The t-test provided evidence that the mean carbon stocking value produced by the *Project Proponent* on the 13 sample plots was not statistically dissimilar to the mean carbon stocking value produced by Aster Global on the same plots. The entirety of the site visit paired with the desk review provided *reasonable* assurance that the carbon inventory was implemented in an acceptable and accurate manner.

## 4.3 Quantitative Review

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

## 4.4 Meetings/Interviews

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

| Date | Attendees | Topics Discussed |
|---|---|---|
| 30 March 2021 | Matt Perkowski<br>Ethel Wilkerson | Opening Meeting |

| | | |
|---|---|---|
| 13 October 2021 | Matt Perkowski<br>Taek Joo Kim<br>Ethel Wilkerson<br>Paul Cousar | Calculation walkthrough/Modeling review |
| 28 November 2022 | Mansfield Fisher<br>Taek Joo Kim<br>Ashley Laux<br>Ethel Wilkerson<br>Paul Cousar | Review of Round 3 Findings |
| 18 January 2023 | Mansfield Fisher<br>Ethel Wilkerson | Closing Meeting |

## 4.5 Verification Milestones

| Project/Verification Activity | Date |
|---|---|
| Aster Global Internal Conflict of Interest (COI) process completed and approved (no issues). | 18 March 2021 |
| ACR approval of ACR-Specific COI Form | 24 March 2021 |
| Submission of Draft Verification and Sampling Plan to *Project Proponent* for approval | 30 March 2021 |
| Opening meeting with *Project Proponent* | 30 March 2021 |
| Submission and Receipt of signed Version 1 Verification and Sampling Plan to and from *Project Proponent* for approval | 02 April 2021 |
| Site Visit | 7-10 April 2021 |
| Corrective actions/clarifications submitted | 01 March 2022<br>01 September 2022<br>16 November 2022<br>20 December 2022 |
| Aster Global completes review | 10 January 2023 |
| Aster Global holds closing meeting and finalizes report and submits to ACR and *Project Proponent* | 18 January 2023 |

## 4.6 ACR Forest Carbon Project Standard Requirements

### 4.6.1 Eligibility Requirements

The *Project* is an IFM project that is intended to create additional carbon stocks in the project area through the implementation of Improved Forest Management practices to represent a significant improvement in the carbon storage and conservation value and forgo higher financial returns and more aggressive management regimes of industrial private lands in the region, which are characterized by shorter, even-aged rotations. The *Project* is in compliance with ACR's Standard. Specific details are located in the Validation Report.

### 4.6.2 Additionality

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

### 4.6.3 Permanence and Risk Mitigation

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

The *Project Proponent* utilized the ACR-approved risk assessment tool. Aster Global reviewed and assessed the implementation and outputs of the tool provided by the *Project Proponent* and agrees with the calculated buffer withholding of 18%.

### 4.6.4 Baseline and Leakage

Aster Global confirms the project baseline as harvest levels that maximize the net present value (NPV) at a 5% (private non-industrial) discount rate (for non-governmental organizations) subject to Wolf Lands, Inc. existing harvest constraints. The baseline scenario involves clearcuts throughout the entire project area excluding riparian buffers. The final baseline scenario was calculated as the maximization of NPV of plausible harvest regimes.

The *Project Proponents* accounted for market leakage by applying a default market leakage discount factor of 40% per the methodology requirements, as project activities decrease total wood products produced by the project relative to the baseline by 25% or more over the Crediting Period. The calculation of this default market leakage discount factor of 40% was confirmed by Aster Global through independent data checks. The methodology considers any decrease in production would be transferred to forests of a similar type.

### 4.6.5 Monitoring

Aster Global confirmed the appropriateness and implementation of the project monitoring plan, which details monitored data and parameters, measurements, timing, and data storage procedures. The project has outlined data management procedures including QA/QC procedures in the inventory manual titled *Wolf Lands Forest Carbon Offset Project Inventory Manual* and in Section D of the GHG Project Plan. The VVB reviewed both the GHG Project Plan and forest inventory SOPs and confirmed that the data management system is in place and the VVB is reasonably assured that the implemented data management system has been appropriately applied.

### 4.6.6 Community and Environmental Impacts

Aster Global confirms the project's net positive community and environmental impacts and co-benefits such as carbon sequestration, habitat protection for wildlife, trees, and plant species, water quality protection, and reduced soil erosion.

### 4.6.7 Stakeholders Comments

Stakeholder comments are not applicable for this project. The Project Proponent, Wolf Lands, Inc. is a private forestland owner, and adhere to their internally agreed upon practices of project consultation and notification on associated decision making.

### 4.6.8 GHG Emissions Reduction and Removal Enhancements (ERTs)

| GHG Reductions or Removals | Units |
|---|---|
| Baseline Emissions / Reductions | 121,684 $tCO_2e$ |
| Project Emissions | -12,367 $tCO_2e$ |
| Leakage | 53,621 $tCO_2e$ |
| Uncertainty Deduction Rate | ~13.91% |
| 2020 Buffer Pool Contribution | 7,727 $tCO_2e$ |
| 2021 Buffer Pool Contribution | 4,736 $tCO_2e$ |
| 2020 GHG emission reductions total ($tCO_2e$) | 31,240 |
| 2021 GHG emission reductions total ($tCO_2e$) | 19,147 |
| 2020 GHG removals total ($tCO_2e$) | 3,960 |
| 2021 GHG removals total ($tCO_2e$) | 2,427 |
| Total Emission Reduction Tonne(s) (ERTs) | 56,774 |

## 4.7 Verification Findings

The Aster Global verification team identified non-conformity reports (NCRs) and clarifications (CL). All were addressed satisfactorily by the *Project Proponent* during the project verification

process. These NCRs and CLs provided needed clarity to ensure that the project was implemented in accordance with the approved methodology and was in compliance with ACR's Standard.

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

## 4.8 Forward Action Requests

Aster Global is issuing a Forward Action Request (FAR) related to the fire risk score. After discussion with ACR, VVB determined that a FAR was warranted because there was a fire that occurred during the reporting period within the project area. As a result, during the next Reporting Period this fire may trigger an increase in the Fire Risk score for the project.

## 4.9 Verification Results/Conclusions

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

The GHG assertion provided by the *Project Proponent* and verified by Aster Global has resulted in the GHG emission reductions of 56,774 $tCO_2$ equivalents by the project during the verification period/reporting period (20 May 2020 – 19 May 2021).

**Submittal Information**:

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|---|---|
| Report Submitted to: | Wolf Lands, Inc.<br>American Carbon Registry<br>Spatial Informatics Group (SIG) |
| Report Submitted by: | Aster Global Environmental Solutions, Inc.<br>3800 Clermont St. NW<br>North Lawrence, Ohio 44666 |
| Aster Global Lead Validator/Verifier Name and Signature: |  <br>Mansfield Fisher |
| Aster Global Internal Reviewer Name and Signature: |  <br>Shawn McMahon |
| Aster Global Sr. Vice President/Technical Director Name and Signature |  <br>Janice McMahon<br>President |
| Date: | 03 May 2023 |

MSF/SM/JPM/CJM/21080.00 SIG Wolflands ACR ValVer Report V2.1_20230503
ACR SP: PF 04/18/2023F

# Appendix A – Aster Global Verification Findings

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|---|---|
| **American Carbon Registry Standard Version 7.0, December 2020** | Regulatory Compliance - Adherence to all laws, regulations, and other legally binding mandates directly related to Project Activities. - Projects must maintain material regulatory compliance. To do this, a regulatory body/bodies must deem that a project is not out of compliance at any point during a re-porting period. Projects deemed to be out of compliance with regulatory requirements are not eligible to earn ERTs during the period of non-compliance. Regulatory compliance violations related to administrative processes (e.g., missed application or reporting dead-lines) or for issues unrelated to integrity of the GHG emissions reductions shall be treated on a case-by-case basis and may not disqualify a project from ERT issuance. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | WolfLand-listing form-SIGNED.pdf<br><br>Section C1 of GHG Plan |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The V/V team did not locate an attestation in the GHG Plan that the project has maintained material regulatory compliance at all points during the reporting period. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please ensure the mentioned attestation is included in the GHG Plan and Monitoring Report. |
| **Round 1 Response from Project Proponent (21 June 2022)** | Required Attestations are located within Section IX of the monitoring report. A signed version of the monitoring report is typically submitted to ACR once all findings have been closed. If you need signed attestations prior to this time, we can provide them on a draft version of the monitoring report. |
| **Aster Findings - Round 2 (01 September 2022)** | Though the MR Section IX discusses adverse environmental and community impacts, this does not actually speak to regulatory compliance. However, Section III.4 does now include the required attestation of regulatory compliance.<br><br>No further regulatory compliance issues were noted during field or desk audit activities. **This item is addressed.** |

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| **American Carbon Registry Standard Version 7.0, December 2020** | Financial - Does the project face capital constraints that carbon revenues could address; or is carbon funding reasonably expected to incentivize the project's implementation; or are carbon revenues a key element to maintaining the project action's ongoing economic viability after its implementation? YES = PASS NO = FAIL |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan Part C3 |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The GHG Plan states: " A financial feasibility assessment is provided separately for verification demonstrating the financial barrier carbon funding overcomes in project implementation." However, the audit team was unable to locate a financial feasibility assessment in the project documents provided. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please provide the financial feasibility assessment demonstrating the project faces a financial barrier. |
| **Round 1 Response from Project Proponent (21 June 2022)** | More details and a reference file were added to this section. |
| **Aster Findings - Round 2 (01 September 2022)** | Additional detail has been provided in the GHG plan referencing the baseline workbook. The audit team notes that the table has not been updated, in line with comment from the project team. This item will remain open pending addressing related items and table update. |
| **Round 2 NCR /CL/OFI** | CL: Please update the table in GHG plan, in line with the baseline workbook. |
| **Round 2 Response from Project Proponent (22 September 2022)** | Table C3.1 has been updated for the baseline NPV. |
| **Aster Findings -** | The audit team confirmed the baseline NPV has been appropriately updated. **This finding is closed.** |

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| **Round 3 (insert date)** | |

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| **American Carbon Registry Standard Version 7.0, December 2020** | The GHG Project Plan shall use the ACR template and include the following information: |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The correct ACR template is used. However, the section lettering is incorrect throughout the GHG Plan after Section B. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please update the GHG Plan with correct section lettering. |
| **Round 1 Response from Project Proponent (21 June 2022)** | Section lettering was updated |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team confirmed the GHG Project Plan has been appropriately updated to include the correct section lettering. Item closed. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | Project title, purpose(s), and objective(s); |

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| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan Part A1 |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The GHG Plan provides a project title, but the audit team was unable to locate a purpose or objective. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please update the GHG Plan to include a project purpose and objective. |
| **Round 1 Response from Project Proponent (21 June 2022)** | See section A5.3 Project Purpose and Objectives on page 16 |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team confirmed that the project purpose and objective are appropriately described in Section A5.3 of the GHG Project Plan. Item closed. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | The regulatory compliance attestation must disclose all violations or other instances of non-compliance with laws, regulations, or other legally binding mandates directly related to Project Activities. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess** | |

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| **(Location in PD, MR or Supporting Documents** | |
| **Validation or Verification or Both** | |
| **Findings - Round 1 (01 March 2022)** | Section III: Project Details Part 4: Regulatory Compliance of the MR does not appear to be filled out correctly, as no attestation was located in that section. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please update Section 4: Regulatory Compliance of the MR to satisfy this criteria. |
| **Round 1 Response from Project Proponent (21 June 2022)** | This section was updated. |
| **Aster Findings - Round 2 (01 September 2022)** | Section III.4 now includes the required attestation. This item is addressed. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | Project Proponents shall use the template for Project Monitoring Reports available at www.americancarbonregistry.org. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | MR |
| **Validation or Verification or Both** | Both |
| **Findings - Round 1 (01 March 2022)** | Pending updates. |

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| **Round 1 NCR/CL/OFI (01 March 2022)** | |
| **Round 1 Response from Project Proponent (21 June 2022)** | |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the monitoring report and noted that the template used is not in line with the file on the ACR website, version 4.0. It is unclear how this is appropriate or was approved by ACR. |
| **Round 2 NCR /CL/OFI** | NCR: Please use the correct monitoring report template, in line with the standard or provide written guidance from ACR that an old template is appropriate. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The Monitoring report has been updated. |
| **Aster Findings - Round 3 (insert date)** | The monitoring report has been updated to use the correct template. **This finding is closed.** |

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| **American Carbon Registry Standard Version 7.0, December 2020** | If an environmental impact analysis is required by the methodology, provide confirmation of compliance with any applicable analysis requirements, unless the analysis was undertaken for the whole Aggregated Project and applies equally to each site. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan Section F |
| **Validation or Verification or Both** | |

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| **Findings - Round 1 (01 March 2022)** | The project undertook an EIA in Section F of the GHG Plan, and it can be assumed it applies equally to each site, although the GHG Plan does not state this, so it is somewhat unclear. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please add confirmation that the EIA included in Section F applies equally to each aggregate site. |
| **Round 1 Response from Project Proponent (21 June 2022)** | Language added to section F1. "This analysis was undertaken for the whole Aggregated Project and applies equally to each site. " |
| **Aster Findings - Round 2 (01 September 2022)** | The noted language was confirmed to be added to the GHG Plan and adds the necessary clarity to ensure this requirement has been met. This item is addressed. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | Assess general and project-specific risk factors for an Aggregated Project as for any other project. The risk rating is applied at the overall Aggregate; |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan B8 |
| **Validation or Verification or Both** | Both |
| **Findings - Round 1 (01 March 2022)** | The Project has taken the default values for all categories except fire. The risk for fire was provided for the aggregated sites based on the Wildfire Hazard Potential (WHP) map provided by the USFS. It appears some of the areas in Minnesota were in a higher bracket, so it is unclear how the value of 2% was established. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please provide more information for how the fire score of 2% was calculated at the aggregate project level. |

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| **Round 1 Response from Project Proponent (21 June 2022)** | Language added to GHG Plan "The USFS Fire Risk Map (Figures B8.1.1, B8.1.2, B8.1.3) show that the majority of the project area has very low to moderate fire risk which supports selection of the 2% default value. " |
| **Aster Findings - Round 2 (01 September 2022)** | It is still unclear how 2% is appropriate given the project area revision brought on by the fire event. |
| **Round 2 NCR /CL/OFI** | CL: Please clarify in line with the findings. |
| **Round 2 Response from Project Proponent (22 September 2022)** | According to the ACR Risk Tool, the appropriate fire risk score to apply is 2% if the project is located in a low fire risk region or 4% if project is located within a high fire risk region. The USFS Fire Risk Map shows and confirms that 70% of the project area is in the very low category, 18% of the project area is in the low risk category, 7% of the project area is in the moderate class, and only 3% of project area acres can be considered as having high fire risk. Since 88% of the project area acres are classified as having low to very low fire risk, the appropriate risk score to apply is 2%.<br><br>The 8% risk value is applicable "if project is located in an area where fire greater than 1000 acres has occurred within 30-mile radius within the prior 12 months." Reporting period 1 (5/20/2020-5/20/2021) currently undergoing verification did not experience fire activity within 30 miles of the project area within those dates, or the prior 12 months. An unusual fire event occurred between August 2021 and October 2021. |
| **Aster Findings - Round 3 (insert date)** | The VVB is going to take this issue to ACR, discussed this issue with ACR and ACR confirmed that the project proponent is correct. The VVB will issue a FAR to ensure the risk score is re-analyzed at the next verification. This finding is closed. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | The Project Proponent shall assess general and project-specific risk factors for a PDA project as for any other project. The risk rating is applied at the overall PDA level. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess** | GHG Plan B8 |

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| **(Location in PD, MR or Supporting Documents** | |
| **Validation or Verification or Both** | |
| **Findings - Round 1 (01 March 2022)** | It is unclear how risk described in Section B8 of the GHG Plan was applied at the overall PDA level. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please demonstrate how the risk rating was applied at the overall PDA level. |
| **Round 1 Response from Project Proponent (21 June 2022)** | Language added to section B8. "The calculated risk score is applied in aggregate to all acres within the project. The risk score will be revisited at subsequent verifications as described in the applicable ACR Standards and reevaluated when additional sites are included in the carbon project. " |
| **Aster Findings - Round 2 (01 September 2022)** | The language added to Section B8 of the GHG Plan adds sufficient clarification that the risk rating was applied at the aggregate level. The appropriateness of this designation can be further confirmed in review of the project's applicability of the risk tool. This item is addressed here. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | The GHG Project Plan shall specify the programmatic boundaries (geographic, temporal, and GHG assessment boundary), a baseline scenario, and a monitoring/verification plan for the entire PDA (i.e., for the initial and future participating sites), to include a proposed recruitment schedule for future sites to be enrolled in the project. It must also include the site-specific details for at least one enrolled project site upon listing. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan |
| **Validation or Verification or Both** | |

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| **Findings - Round 1 (01 March 2022)** | The GHG Plan Section A9 includes the geographic, temporal, and GHG assessment boundaries, a baseline scenario, and a monitoring/verification plan for the PDA. It is unclear where the recruitment schedule is located in the GHG Plan. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please include a recruitment schedule as mentioned in the requirement. |
| **Round 1 Response from Project Proponent (21 June 2022)** | Language added in section A9.1 (page 23). "The recruitment schedule for additional future sites is rolling. Additional sites will have a site-specific implementation date and will be enrolled within the project by May 20, 2025, 5 years from start date. " |
| **Aster Findings - Round 2 (01 September 2022)** | The newly added language provides sufficient detail of the rolling recruitment schedule. This item is addressed. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | The reason why all expected project participants and sites cannot be included upon initial validation; |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | |
| **Validation or Verification or Both** | |
| **Findings - Round 1 (01 March 2022)** | The audit team was unable to locate where this requirement is met in the GHG Plan. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please include the reason why all expected project participants and sites cannot be included upon initial validation |

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| **Round 1 Response from Project Proponent (21 June 2022)** | Language added to section A9. "Additional sites may be added as additional acreage is acquired by the project proponent. " |
| **Aster Findings - Round 2 (01 September 2022)** | The newly added language clarifies that the reason future projects are not currently included is because they are not under ownership of the Project Proponent. This item is addressed. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | Project Proponents shall disclose in their Monitoring Reports any negative environmental or community impacts or claims of negative environmental and community impacts and the appropriate mitigation measure applied. They shall also attest to no undisclosed or unmitigated adverse environmental or community impacts as a result of the project. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | MR Section IX |
| **Validation or Verification or Both** | Both |
| **Findings - Round 1 (01 March 2022)** | The audit team was unable to locate a signed attestation included in the project documents. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please provide a signed attestation stating no undisclosed or unmitigated adverse environmental or community impacts. |
| **Round 1 Response from Project Proponent (21 June 2022)** | Required Attestations are located within Section IX of the monitoring report. A signed version of the monitoring report is typically submitted to ACR once all findings have been closed. If you need signed attestations prior to this time, we can provide them on a draft version of the monitoring report. |
| **Aster Findings - Round 2 (01 September 2022)** | Section IX of the MR contains the required attestations, and future signing of the MR will ensure this requirement is met. This item is addressed. |

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| **American Carbon Registry Standard Version 7.0, December 2020** | The risk rating is applied at the overall aggregate or PDA level. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan Section B8 |
| **Validation or Verification or Both** | |
| **Findings - Round 1 (01 March 2022)** | It is unclear how this was carried out. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please demonstrate how the risk rating was applied at the overall aggregate or PDA level. |
| **Round 1 Response from Project Proponent (21 June 2022)** | Language added to section B8. "The calculated risk score is applied in aggregate to all acres within the project. The risk score will be revisited at subsequent verifications as described in the applicable ACR Standards and reevaluated when additional sites are included in the carbon project. " |
| **Aster Findings - Round 2 (01 September 2022)** | The language added to Section B8 of the GHG Plan adds sufficient clarification that the risk rating was applied at the aggregate level. The appropriateness of this designation can be further confirmed in review of the project's applicability of the risk tool. This item is addressed here. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | This methodology is applicable only on non-federally owned forestland within the United States |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | Table A3.1, Section G1, 2_Ownership sub-folder |
| **Validation or Verification or Both** | |
| **Findings - Round 1 (01 March 2022)** | Section G1 of the GHG Plan states "Forestlands included in the project are owned directly by the Project Proponent, Wolf Lands, Inc."<br><br>Initial review of provided Wisconsin deeds shows some lands have been granted to Wolfwood Corporation. Additionally, some lands in Michigan have been granted to Wolf Lands Wisconsin. It is unclear how these entities legally comprise Wolf Lands, Inc. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please provide documentation or an explanation linking the different legal entity names to Wolf Lands, Inc. - the Project Proponent. |

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| **Round 1 Response from Project Proponent (21 June 2022)** | Folder called "Wolf Lands Legal Docs" has incorporation, certificates, and correspondences for multiple organizations stating that, currently, Wolf Lands Wisconsin, Inc. is the parent/holding company and Wolf Lands, Inc. and Wolfwood Corp are subsidiaries. Wolf Lands Wisconsin is a S-corp and others disregarded entities (or treated as disregarded entities). Michel Costley was the incorporator and Lloyd Purnell is the registered agent for the parent company (and certificates of ownership for Wolfwood Corp were transferred to Lloyd and Michael Purnell). |
| **Aster Findings - Round 2 (01 September 2022)** | Documents were provided to the audit team demonstrating that Wolf Lands Wisconsin and Wolfwood Corporation and under Wolf Lands, Inc., which are all owned by Lloyd and Michael Purnell. This item is addressed. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | CH4 - Burning of biomass - Included - Non-CO2 gas emitted from biomass burning |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | Table B4.2, Wolflands_GHGPlan_081621.pdf |
| **Validation or Verification or Both** | Validation |

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| **Findings - Round 1 (01 March 2022)** | CH4- burning of biomass is excluded. It is conservatively assumed to be zero in the baseline. More clarification is needed since it is a required source to be included. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please clarify why this required source was excluded. |
| **Round 1 Response from Project Proponent (21 June 2022)** | There is no burning of any kind on this project, ever, per Justin at Green Timber. |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team understands that no burning of any kind is anticipated throughout the life of the project. However, this is a GHG source that is required to be included by the methodology. |
| **Round 2 NCR /CL/OFI** | NCR: Please update the GHG Project Plan to include all relevant GHG sources in line with the methodology. Alternatively, please provide written guidance from ACR that the required pool is not required for this project. |
| **Round 2 Response from Project Proponent (22 September 2022)** | Table B4.2 in the GHG plan has been updated to include this source. It is zero in all the mathematical accounting formulas and thus its inclusion has no impact on modeled ERTs. |
| **Aster Findings - Round 3 (insert date)** | The GHG source has been included. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | The IFM baseline is the legally permissible harvest scenario that would maximize net present value (NPV) of perpetual wood products harvests, used as a proxy for the multiple forest management objectives typical of each owner class eligible under this methodology. |
| **Applicability to** | Y |

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| **the Project (Y or N/A)** | |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL12_LPA_Baseline_v3_20210810.xlsb / B5. BASELINE, Wolflands_GHGPlan_081621.pdf |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The baseline scenario is developed as per the requirement: "The Baseline Scenario represents harvest levels that maximize the net present value (NPV) at a 5% (private non-industrial) discount rate (for non-governmental organizations) subject to Wolf Lands, Inc. existing harvest constraints."<br><br>In “Tab E5.1,.2, PC378_WL14_ERTs_v3_20210818.xlsx”, it is unclear to the audit team why the buffer deduction included in carbon revenue.<br><br>The audit team reviewed the STMPG_Rates tab of the PC378_WL12_LPA_Baseline_v3_20210810 workbook and noted errors within this tab. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please clarify in-line with the finding.<br><br>CL: Please ensure that all values within the STMPG_Rates tab are correct, if necessary update all downstream calculations. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1a) Do not clearcut stands with < 40 sq ft of basal area >= 5" DBH<br>1b) Do not harvest at all in riparian buffers<br>1c) Limit total harvest to 10,000 MBF/year due to limited local mill capacities<br>2) Buffer credits are included in the NPV analysis because SIG planned to purchase lower cost credits to replace them. This replacement did not occur and update file PC378_WL14_ERTs_v3_F1_2022_04_20.xlsx has removed them from the NPV calcs.<br>3) The row-shift error has been fixed on tab [STMPG_Rates] in file PC378_WL12_LPA_Baseline_v3_F1_2022_04_20.xlsb, note that the [STMPG_Rates] tab is informational only and has no impact on the LP solution. |

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| **Aster Findings - Round 2 (01 September 2022)** | The audit team notes the buffer credits have been removed. The item no longer applies.<br><br>The audit team understands that the tab has no impact in the LP solution. The item has been addressed.<br><br>The audit team noted that the LP solution values (acreages) have been provided but the model itself has not been provided or shown, to ensure accurate application of the procedure. |
| **Round 2 NCR /CL/OFI** | CL: Please provide the LP model run or a demonstration of the specific LP model as run. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The Baseline Excel file is an LP model. Use the OpenSolver add-in to solve. |
| **Aster Findings - Round 3 (insert date)** | Thank you for the clarification. Please provide a screen shot or similar showing the OpenSolver-Model, e.g. Objective cell, variable cells, constraints, etc. |
| **Round 3 NCR /CL/OFI** | CL: Please clarify in line with the finding. |
| **Round 3 Response from Project Proponent (DD Month YYYY)** | See word doc, response #1 |
| **Aster Findings - Round 4 (insert date)** | Thank you for providing the additional documentation. The audit team reviewed the screenshot provided by the project demonstrating the OpenSolver model implementation and is reasonably assured the model was run appropriately. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands -** | The baseline determination is project-specific and must describe the harvesting scenario that would maximize NPV of perpetual wood products harvests over a 100-year modeling period. |

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| **Version 1.3 April 2018** | |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL12_LPA_Baseline_v3_20210810.xlsb |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The baseline scenario is defined by maximizing NPV at 5% discount rate based on linear programming approach.<br><br>The audit team reviewed the PC378_WL12_LPA_Baseline_v3_20210810 and is unclear how the values in the FVS_C_AG_LIVE_ALL tab are derived. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please clearly describe where the data in FVS_C_AG_LIVE_ALL is derived from and clearly describe what intermediate steps are taken to convert the FVS outputs to this tab. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) The RxIDs are simply the year (121000 is CC in 2021), and RxID2 is either for plots cut in the 1st decade (10060) with a 60 year rotation or later (50060).<br>2) The RxIDs are part of the StdIdent keyword<br>3) When FVS is completed, the StdIdent keyword text with the RxIDs are in table FVS_Cases in field 'runtitle'. This is standard FVS behavior.<br>4) SIG has added fields to all FVS tables for the RxIDs, and has queries in Access that populate those fields, that is they parse the IDs from the 'runtitle' field and copy them into FVS_Carbon, FVS_Summary, etc.<br>5) The values in FVS_C_AG_LIVE_ALL are a simple crosstab of table FVS_Carbon, times 3.664, by plot ID, RxID1 and RxID2 |

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| **Aster Findings - Round 2 (01 September 2022)** | The audit team examined the response and independently sourced from the Access tables. The audit team noted different values when multiplying FVS_Carbon tables by 3.664. Further, the audit team noted that not all run prescriptions for a given plot were included in the final table. For example, plot 2 only has 5 runs, rather than the 16 produced, similar to plot 1. It is unclear how or certain run prescriptions were or were not included. Similarly, this phenomena occurs for the other input tabs from FVS related output. |
| **Round 2 NCR /CL/OFI** | CL: Please address verifier findings and clarify how the FVS_C_AG_LIVE_ALL table and similar as presented are appropriate. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The difference was due to the starting CO2 in the LP model being from FVS online vs the Rxs which were run in the DOS version. SIG updated all CO2 values on tabs [FVS_C_AG_LIVE_All] and [FVS_C_BG_LIVE_All] to the DOS FVS version the Rxs were run with. See files RawAG_LP_Yields_2022_09_08.xlsx and RawBG_LP_Yields_2022_09_08.xlsx. These files have the FVS_Carbon values from each of the 3 yield files. There is a tab for each file, and an LP tab. The LP tab adds the LP key and converts from C to CO2. This tab is copied into the LP model. The difference you noted when muliplying by 3.664 have been fixed and led to 8.7 less tonnes total.<br><br>The Rx databases have all the original plots, for all the original Rxs, which are clearcut timings. Stands with < 3.5 mbf/acre at time of clearcut, and plots in the burn have been removed from the data going into the LP. A stand with > 3.5 mbf/acre at the project start will have clearcuts every year for the first decade, and then at the midpoint of the remaining decades for 15 clearcuts and 1 no-cut. A stand with only 0.5 mbf may not have 3.5 mbf/acre until year 55, and will thus only have 4 Rxs. |

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| **Aster Findings - Round 3 (insert date)** | Thank you for the responses and additional files.<br><br>1. It is unclear to the audit team why only the year 2021-2029 values in the 'FVS_C_AG_LIVE' tab in the "PC378_WL12_LPA_Project_NoCut_PB_2022_09_14.xlsx" workbook are discounted for % defect.<br><br>2. The audit team used the access databases provided dated 20210722 to check the values in the WL12 Baseline workbook dated 20220914. In review of the FVS_C_BG_LIVE_ALL tab, the audit team found many values do not match the FVS outputs. For example, S1P141:165005-50060 in 2021 the project reports 4.90262162689046; however, the FVS output value for 2025 is 2.20380139350891 and when linearly interpolated the audit team found the value to be 5.07707651443481. It is unclear why these discrepancies exist.<br><br>3. The audit team used the access databases provided dated 20210722 to check the values in the WL12 Baseline workbook dated 20220914. In review of the FVS_C_BG_LIVE tab, the audit team found that for the 10060 prescriptions values in the harvest year are the pre-harvest values but for the 50060 prescriptions values in the harvest year are post-harvest values. For example, S1P031:126000-10060 in year 2026 the value is 9.3039828414917 and the 2027 value is 0.0814092913269997; however, for S1P037:135000-50060 the value in 2035 is 0. It is unclear why these discrepancies between pre-harvest and post-harvest values within the harvest year exist between different prescriptions.<br><br>4. Please clarify for all values used in the baseline modeling which values are pre-harvest vs. post-harvest.<br><br>5. The GHG Plan states "1. The only regeneration harvest modeled was clearcutting.<br>a. Clearcuts were modeled starting in 2020, and then in one-year intervals for the 1st decade, and then at the midpoint of each latter decade.<br>b. Clearcuts were allowed on stands IF they have a minimum inventory of 2,500 board feet/acre, and IF the stand was growing less than the 5% discount rate.<br>c. The subsequent rotation age was modeled at 60 years." However in review of the WL12 baseline workbook the audit team noted that many plots do not have all the modeling prescriptions. For example, Plot 116 doesn't have clearcuts modeled every year for the first decade. It is unclear why the discrepancy between what is stated in the GHG Plan and the implementation of the modeling occurs. The audit team needs additional detail to understand how it was determined which plots would receive the different clearcut modeling that are used in the WL12 baseline workbook. Additionally, the audit team reviewed the Rx databases described in the project's response but it still appears there are missing prescriptions.<br><br>6. Please clarify how the values in the FVS_C_HRV tab are derived.<br><br>7. The audit team reviewed the Cut_STMPG tab of the WL12 Baseline workbook and it is unclear why there are numerous missing values for the year 2085.<br><br>7. In "Trees, PC378_WL00_Carbon_TreeList_2022_06_14.xlsx", the audit team noted that the plots included were different from "GTCF_WolfLands_Carbon_TreeList_03172021.xlsx", where Plots 56/129/175/176/179/180 were not included and fire plots. In addition, species code is different, where 356 is assigned for Plot ID:2 / Tree # 4&5 whereas 681 for "Trees, PC378_WL00_Carbon_TreeList_2022_06_14.xlsx". Please clarify.<br>8. In "Trees, PC378_WL00_Carbon_TreeList_2022_06_14.xlsx", the plots included don't match with the ones in "Trees" tab.It is unclear to the audit team why this occurs. |

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| | 9. In "Column L, Snag CO2, PC378_WL06_May2020_PlotAvgs_PB_2022_09_14.xlsx", it is unclear why 0.95 is applied to all trees. Please clarify.<br>10. In "MODEL, PC378_WL12_LPA_Baseline_PB_2022_09_14.xlsb", the audit team noted that S1P189:122000-10060 (Row 1257) / S1P190:175005-50060 (Row 1271) / S1P191:155005-50060 (Row 1274) were not assigned with any values from "FVS_C_AG_DEAD (Columns IR-JT)" tab although these RxKey have assigned values. |
| **Round 3 NCR /CL/OFI** | CL: Please clarify in line with the standings, updated downstream calculations if necessary, and update reporting documents if necessary. |
| **Round 3 Response from Project Proponent (DD Month YYYY)** | See "FindingsResponse_details_11_17_2022.docx". |

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| **Aster Findings - Round 4 (insert date)** | 1. The VVB reviewed the updated WL12 LPA Project No Cut workbook dated 20221117 and it is unclear why values in years 2021-2120 in the "FVS_C_AG_LIVE" tab do not appear to be discounted for defect. For example, S1P003:999999-90005 in 2021 reports 272.72, however the VVB calculated the value to be 271.81 when discounted for defect. Similarly, it appears that the values in the FVS_C_AG_LIVE tab in the WL12 LPA Baseline workbook dated 20221117 are not discounted for defect in years 2021-2120.<br><br>2. The VVB confirmed that using a formula for compound growth, the FVS_C_BG_LIVE ALL tab is reported correctly for all stands and RxIDs. **This finding is closed.**<br><br>3. The VVB confirms that the FVS_C_BG_LIVE tab consistently utilizes pre-harvest values across all stands and RxIDs. **This finding is closed.**<br><br>4. The VVB confirms that all values used in the baseline modeling are pre-harvest values. **This finding is closed.**<br><br>5. Thank you for the clarification. It is unclear to the audit team how certain Rxs not being run affects the downstream quantification. Furthermore, this doesn't appear to be described in the GHG Plan. Additionally, the project's response states, "Now only plot 3 has an incomplete set (5 out of 10) due to FVS crashing on the black locust records when trying to model planting post clearcut." However, the audit team noted that other plots, for example stand S1P109 and S1P108 don't have a complete set of Rxs.<br><br>6. The VVB reviewed the "FVS_Hrv_Carbon" tab and confirmed that the values were appropriately derived from the FVS output Rx files. **This finding is closed.**<br><br>7. It remains unclear to the audit team why there are no values reported in year 2085 on the Cut_STMPG tab of the WL12 Baseline workbook, as there are values for the year 2085 in the Cut_MBF tab, suggesting that harvesting did occur in the year 2085.<br><br>7. The VVB confirms that “PC378_WL00_Carbon_TreeList_2022_06_14.xlsx” is used consistently throughout carbon stocks modeling. **This finding is closed**.<br><br>8. The VVB confirmed the difference between Plots and Trees tabs in “PC378_WL00_Carbon_TreeList_2022_06_14.xlsx” was in line with the response. **This finding is closed**.<br><br>9. The VVB confirmed in “Snag CO2, PC378_WL06_May2020_PlotAvgs_PB_2022_11_17.xlsx” that 0.95 was removed. **This finding is closed**.<br><br>10. The VVB confirmed that the values were sourced correctly. **This finding is closed**. |
| **Round 4 NCR /CL/OFI** | CL: Please clarify in line with the finding. |

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| **Round 4 Response from Project Proponent (DD Month YYYY)** | #1 SIG has found and corrected this error. The Vlookup to defect was not anchored to the RxKey. The LP was rerun. #5 Stand S1P108 is too poorly stocked to be harvested by 2075 (the last year of modeled CC Rxs), and thus only has the No Cut Rx. Stands S1P109 has 5 Rxs, and the CC in 2045 is selected. Stands S1P008, S1P009, S1P018, S1P029 and others only have No Cut Rxs b/c they have no trees. #7 This has been corrected in file PC378_WL12_LPA_Baseline_PB_2022_12_20.xlsb and the LP model was rerun. |
| **Aster Findings - Round 5** | 1. The VVB reviewed the updated WL12 LPA Project No Cut workbook and WL12 LPA Baseline workbook and confirms that the defect discount has been applied across all years. **This finding is closed.**<br><br>5.<br><br>7. The audit team reviewed the Cut_STMPG tab of the WL12 baseline workbook and is reasonably assured that stumpage values for year 2085 are correctly reported. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | Private Non-Industrial - 5% |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or** | Section B5. Baseline, Wolflands_GHGPlan_081621.pdf, PC378_WL12_LPA_Baseline_v3_20210810.xlsb [MODEL], cell C18 |

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| **Supporting Documents** | |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | GHG plan states 5% discount rate was used as required by IFM methodology, i.e., 5% for Private Non-industrial. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | |
| **Round 1 Response from Project Proponent (21 June 2022)** | |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed PC378_WL12_LPA_Baseline_PB_2022_06_14.xlsx and noted the discount year starts at 2 for the year 2020 and continues to increment in cells EH7:EZ7 of the "Model" tab. It is unclear how the applied discount values are appropriate. |
| **Round 2 NCR /CL/OFI** | CL: Please clarify how use of the discount values are appropriate in line with the finding. |
| **Round 2 Response from Project Proponent (22 September 2022)** | This has been corrected in PC378_WL12_LPA_Baseline_PB_2022_09_07.xlsb. The first cash flow in 2020 is assumed to occur at the end of 2020, thus a discount of 1 year. |
| **Aster Findings - Round 3 (insert date)** | The audit team confirmed in the updated "PC378_WL12_LPA_Baseline_PB_2022_09_14.xlsb" that Cell EH7 was reflected with the updated discount of 1 year. **This finding is closed**. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-** | The baseline management scenario shall be based on silvicultural prescriptions recommended by published state or federal agencies to perpetuate existing onsite timber producing species while fully utilizing available growing space. |

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| **Federal U.S. Forestlands - Version 1.3 April 2018** | |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | 2021_WolfLands_FMP_05182021.pdf / Wolf_Lands_MgmtPlan_Tract_locators_compressed.pdf / VerifierMeet_20211012.docx |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The baseline management scenario is developed upon forest management plans "2021_WolfLands_FMP_05182021.pdf / Wolf_Lands_MgmtPlan_Tract_locators_compressed.pdf", and discussions with the land manager, Justin Miller, for example, no more than 10 MMBF/year can realistically be cut and sold in the project area. No substantiation for the limit of 10 MMBF/year has been provided to the audit team from Justin Miller.<br><br>Further the baseline includes a minimum harvest level of 2.5MBF/acre for when a plot can be clearcut. Based on professional experience it is unclear that lands would be commercially clearcut with that amount of volume. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please provide the audit team with statements from the forester that the modeling decisions are appropriate for the project area. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) Justin has provided documentation that clearcuting can occur once the plot exceeds 40 sq. ft. of merchantable basal area. An analysis of the 1st 2 decades of harvesting shows all clearcuts that happen at less than 40 sq ft have less than 3.0 mbf/acre (see file PC378_WL17_CCvolsInBaselineSoln_2022_04_20.xlsx). The updated LP model has removed 220 Rxs that cut below 3.5 mbf/acre. |

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| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the provided response, the audit team in uncertain of the document referred to in the response provided by Justin Miller.<br><br>Further, the provided response states that cuts below 3.5mbf/acre have been removed. The audit team understands this would be in line with the related statement above from Justin Miller. This item will be closed, pending clarification from above. |
| **Round 2 NCR /CL/OFI** | CL: Please provide clear reference to the documentation provided by Justin Miller. |
| **Round 2 Response from Project Proponent (22 September 2022)** | SIG does not see any mention of external documentatoin in file GreenTimber-Wolflands_Mill_Rx_Statement_04272022.pdf. SIG requests clarification on the CL in J21. |
| **Aster Findings - Round 3 (insert date)** | The VVB determined that this CL was issued in error. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | If the project activity area is not homogeneous, stratification may be used to improve the modeling of management scenarios and precision of carbon stock estimates. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in** | PC378_WL12_LPA_Baseline_PB_2022_06_14.xlsb |

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| **PD, MR or Supporting Documents** | |
| **Validation or Verification or Both** | Both |
| **Findings - Round 1 (01 March 2022)** | |
| **Round 1 NCR/CL/OFI (01 March 2022)** | |
| **Round 1 Response from Project Proponent (21 June 2022)** | |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed PC378_WL12_LPA_Baseline_PB_2022_06_14.xlsb and noted that the pivot table located in the "Rx Allocations" tab cells B1:E13 has not been updated. |
| **Round 2 NCR /CL/OFI** | CL: Please update the referenced pivot table in line with revised quantification or clarify if this table is not used. |
| **Round 2 Response from Project Proponent (22 September 2022)** | This table has been updated in file PC378_WL12_LPA_Baseline_PB_2022_09_08.xlsb. |
| **Aster Findings - Round 3 (insert date)** | The table has been appropriately updated in the revised baseline workbook. **Item closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S.** | Equation (5) |

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| **Forestlands - Version 1.3 April 2018** | |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL14_ERTs_v3_20210818.xlsx |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The audit team reviewed the Model tab of the PC378_WL12_LPA_Baseline_v3_20210810 workbook and it is unclear how the equation in cell GH4 is inline with the methodology. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please clarify in line with the finding and if necessary update the quantification workbook, all downstream calculations, and the any project documents that require changes. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1)The values in cells GH4 are not part of any report. The ERT file has the correct equation for the average baseline stocking; specifically on tab [Tab E5.1,.2], Row 15. These values have been deleted from file PC378_WL12_LPA_Baseline_v3_F1_2022_04_20.xlsb. |
| **Aster Findings - Round 2 (01 September 2022)** | Thank you for the clarification. The audit team confirms that these values have been removed from the baseline file and acknowledges that the ERT file includes the average baseline stocking. Item closed. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | The Project Proponent shall provide a graph of the projected baseline stocking levels and the long-term average baseline stocking level for the entire Crediting Period (see Figure1). |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL14_ERTs_v3_20210818.xlsx / Figure A7.1., Wolflands_GHGPlan_081621.pdf |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | A graph of the projected baseline stocking levels for the entire Crediting Period is provided in "PC378_WL14_ERTs_v3_20210818.xlsx / Wolflands_GHGPlan_081621.pdf", however the long-term average baseline stocking level is not included in the graph. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please include the long-term average baseline stocking level in "Figure A7.1., Wolflands_GHGPlan_081621.pdf", as suggested by the IFM methodology. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) The average has been added to figure A7.1 in file PC378_WL14_ERTs_v3_F1_2022_04_20.xlsx |
| **Aster Findings - Round 2** | The audit team confirms the GHG Project Plan has been appropriately updated to include the referenced figure. Item closed. |

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| **(01 September 2022)** | |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | Prior to year T (T = year projected stocking reaches the long-term baseline average) the value of ΔCBSL,t will most likely be negative for projects with initial stocking levels higher than CBSL,AVE or positive for projects with initial stocking levels lower than CBSL,AVE. If years elapsed since the start of the IFM project activity (t) is ≥T to compute long-term average stock change use: |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL14_ERTs_v3_20210818.xlsx |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The audit team reviewed the WL14 workbook and noted that the Year T values calculated in row 16 of the Tab E5.1,.2 of the WL14 workbook is not calculated in line with the methodology. Specifically, projected baseline stocking does not appear to be calculated correctly as it does not account for HWPs from previous years. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please update the calculation of the Year T value to meet the requirements of the methodology. If necessary, please update all downstream calculations.<br><br>CL: Please update the GHG plan to reflect the new calculation. |

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| **Round 1 Response from Project Proponent (21 June 2022)** | 1) SIG is unclear on the finding as this ERT form has been verified for several projects including last week by ACR. SIG requests additional information on the error. |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the provided response and noted that HWP is summed over multiple rows rather than in a single row, resulting in equivalent computation for Equation 5. This item has been addressed. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | CBSL,TREE,t and CBSL,DEAD,t must be estimated using models of forest management across the baseline period. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | Section D. Quantification (Growth and Yield Simulation), Wolflands_GHGPlan_081621.pdf |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | FVS with Lake States variant is used.<br><br>It is unclear to the audit team what calculations were applied in the FVS_C_AG_DEAD/FVS_C_AG_DEAD_All tabs in the PC378_WL12_LPA_Baseline_v3_20210810 workbook. |

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| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please provide clear documentation as to how the values in the tabs referenced in the finding are calculated and in-line with the methodology. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1a) dead stock CO2 is computed using the Jenkins equations on table FVS_SnagDet. 1b) the calculations for the project start dead stocks can be found in file PC378_WL06_FVS_May2020_PlotAvgs_20210729.xlsx, tab [Snag CO2] 2) FVS_C_BG_LIVE_ALL has the output from FVS. Because FVS does not output preharvest C, the LP model needs to get that value from an Rx that did not cut in that year. This occurs on tabl FVS_C_BG_LIVE. For example, on the 'All' tab, cell E2 is zero b/c it was cut in that year. But cell E2 on the FVS_C_BG_LIVE grabs the value from the cell below it so there is a value for that Rx. |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the provided response. The additional detail provided is helpful in understanding where outputs were sourced. The item is addressed as related findings have been issued elsewhere in this workbook. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | FVS: Forest Vegetation Simulator |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | Section D. Quantification (Growth and Yield Simulation), Wolflands_GHGPlan_081621.pdf |

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| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | FVS is used for growth and yield modeling.<br><br>The audit team reviewed the PC378_WL10_FIA_BdFt_Defect_20210513_AsterCheck_Initial workbook and is unclear on a few issues.<br>1. It is unclear to the audit team why data from 2001-2010 only is used.<br>2. It is unclear to the audit team why land other than forestland is included in the analysis.<br>3. It is unclear to the audit team how the minimum diameter of 9 inches for the estimates of VOLBFNET and VOLBFGRS is appropriate and in line with the baseline scenario minimum harvest DBH.<br>4. It is unclear to the audit team if chokecherry, pin cherry, and mountain maple are merchantable species.<br><br>5. The audit team reviewed the "PC378_WL09_1Yrto5Yr_BAImults_20210613.xlsx" workbook and it is unclear to the audit team which values correspond to "BAImults" in "PC378_WL07_RxInputs_20210710.xlsx" and how "BAImults" were determined. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please clarify in line with findings 1-4 and update the analysis in the PC378_WL10_FIA_BdFt_Defect_20210513 workbook if necessary.<br><br>CL: Please clarify in line with finding 5. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) Years 2001-2010 were used b/c those are the years that were last measured, there is no data after 2010 for this region. Including earlier years would be to include earlier measurements, and thus count plots twice.<br>2) It is unclear to SIG how the verifier has determined that plots with trees are non-forest in the FIA data. SIG will pull those plots from the dataset once the verifier explains the methods.<br>3) The FIA data only has sawlog defect and BFDEFECT keyword only applies to sawlogs<br>4) The species mentioned are submerchantable when harvested, and therefore do not contribute to the volume cut or NPV<br>5) The values in file PC378_WL09_1Yrto5Yr_BAImults_20210613.xlsx are to calibrate annual growth results to periodic growth results, over the 1st 3 five-year periods, on a plot by plot basis; and therefore have no interaction or relationship to the regeneration calibration values in file PC378_WL07_RxInputs_20210710.xlsx. The values in file PC378_WL07_RxInputs_20210710.xlsx are computed in file PC378_WL08_RxRegn_1YrMlts_20210710.xlsx. The evaluation methods are described in file PC378_WL_Quant_Files_20210812.docx. |

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| **Aster Findings - Round 2 (01 September 2022)** | 1)The audit team understands the logic applied and agrees that range is therefore appropriate.<br>2)The audit team reviewed the response and agree. The item has been addressed.<br>3)The audit team understands the logic applied and agrees the approach is appropriate.<br>4)The response implies these species are submerchantable and not used for other parts of the analysis, however prices in the stumpage lookup tables exist for the species in question. It is unclear how the response provided is applied, given the tblLkupStumpage tables.<br>5)The additional detail provided was helpful in helping to rectify audit team understanding of the presented files. The item has been addressed. |
| **Round 2 NCR /CL/OFI** | CL: Please clarify item 4, in line with audit team findings. |
| **Round 2 Response from Project Proponent (22 September 2022)** | Those species never grow to 5" DBH in the Rx the LP model selected. Those small trees can not be sold and are typcially cut, slashed and scattered. Stumpage only applies to trees >= 5" DBH. |
| **Aster Findings - Round 3 (insert date)** | While the audit team noted the growth of > 5" for those species in FVS_CutList_East (e.g. StandID: 1_140, Year: 2095, TreeIndex: 198, Species: MM, DBH: 6.08972454, SBdFt: 12.6000004 / PC378_RxsCCs_1yrOtrDecades_20210722.accdb), it is also noted that a large portion of SBdFt are 0 and the number of those species are small in comparison to other merchantable species, in addition, mostly DBH < 6. It is audit team's understanding that stumpage price only affects NPV maximization and even if those species are included in the NPV max., the effect will be very limited which does not impact the final LP model. Additionally, those species are not included in "PC378_WL07_RxInputs_20210710.xlsx". Therefore, the audit team concludes that the response is deemed appropriate and **this finding is closed**. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands -** | Parameterized for the specific conditions of the project |

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| **Version 1.3 April 2018** | |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | FVS / Calculation files / Calculation call on OCT 13, 2021 |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | FVS is calibrated to LS. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | |
| **Round 1 Response from Project Proponent (21 June 2022)** | |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the updated site index workbook and noted that Plot 29 did not have a measured site index and does not reference the nearest plot in line the procedure outlined in the GHG Plan. |
| **Round 2 NCR /CL/OFI** | CL: Please clarify how the selection of the Plot 29 site index is in line with the GHG Plan as presented. If unable, please update site index in line with the method presented. |

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| **Round 2 Response from Project Proponent (22 September 2022)** | Plots 31 and 26 are the same distance from plot 29. Plot 26 was selected b/c its closer to the project areas average site. Plot 31's site of 36 is very low for the project and is likely to result of a low quality site tree instead of a good representation of localized site quality. |
| **Aster Findings - Round 3 (insert date)** | The audit team agrees with the logic for the response and concludes that the response is appropriate. **This finding is closed**. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | Where model projections are output in five or ten year increments, the numbers shall be annualized to give a stock change number for each year. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL12_LPA_Baseline_v3_20210810.xlsb |
| **Validation or Verification or Both** | Validation |
| **Findings - Round 1 (01 March 2022)** | The audit team reviewed the PC378_WL14_ERTs_v3_20210818 and PC378_WL12_LPA_Baseline_v3_20210810 workbooks and it is unclear to the audit team why carbon stock values are "smoothed" using 10 year increments when FVS outputs are provided in 5 year increments. |

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| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please clarify in line with the finding and if necessary update the quantification workbooks, downstream calculations, the GHG Plan, and Monitoring Report. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) Years 2001-2010 were used b/c those are the years that were last measured, there is no data after 2010 for this region. Including earlier years would be to include earlier measurements, and thus count plots twice.<br>2) It is unclear to SIG how the verifier has determined that plots with trees are non-forest in the FIA data. SIG will pull those plots from the dataset once the verifier explains the methods.<br>3) The FIA data only has sawlog defect and BFDEFECT keyword only applies to sawlogs<br>4) The species mentioned are submerchantable when harvested, and therefore do not contribute to the volume cut or NPV<br>5) The values in file PC378_WL09_1Yrto5Yr_BAImults_20210613.xlsx are to calibrate annual growth results to periodic growth results, over the 1st 3 five-year periods, on a plot by plot basis; and therefore have no interaction or relationship to the regeneration calibration values in file PC378_WL07_RxInputs_20210710.xlsx. The values in file PC378_WL07_RxInputs_20210710.xlsx are computed in file PC378_WL08_RxRegn_1YrMlts_20210710.xlsx. The evaluation methods are described in file PC378_WL_Quant_Files_20210812.docx. |
| **Aster Findings - Round 2 (01 September 2022)** | The provided response does not address the previous finding. The previous finding will be reissued. |
| **Round 2 NCR /CL/OFI** | CL: Please clarify in line with the finding and if necessary update the quantification workbooks, downstream calculations, the GHG Plan, and Monitoring Report. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The simple math of using the average of the beginning of decade and end of decade stocking for estimating mid-decade stocking when the full decade's harvest is modeled in a single year in the middle of the decade, is the only mathematical operation that can be used given that the mid-decade harvest covers ten annual years of harvest. Looking at MBF in 2030 (FM15) the model reports 14,277, five years later in the model it has grown to 18,810, and a decades worth of harvest is cut, and then to forest grows to 12,305. However, in reality, the modeled cut in 2035 takes palce in 2031, 2032, 2033 etc, so that by 2035, there is much less than 18,810. The 'reality' number is in row 16 and is 13,291, aka the average of 14,277 and 18,810.<br><br>The mid-decade AG CO2 is handled the same way, but for this metric, FVS outputs the POST harvest C after modeling a decade of harvest in 1 year. The 2030 AG is 294,319 and 2035 is 249,307 but in reality after 5 annual harvests it is really 311,693 aka the average of 2030 and 2040 stocking. |

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| **Aster Findings - Round 3 (insert date)** | Thank you for the additional clarification. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | The mean carbon stock in aboveground biomass per unit area is estimated based on field measurements in sample plots. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GTCF_WolfLands_Carbon_TreeList_03172021.xlsx |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | Field measurements in sample plots are provided in "GTCF_WolfLands_Carbon_TreeList_03172021.xlsx".<br><br>The audit team was unable to find the raw data from the Winget & Kozlowski 1965 paper.<br><br>The audit team noted that the original inventory included 5 plots that were not included in the project (175, 176, 177, 179, and 180). It is unclear why these plots were dropped from the project. |

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| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please provide the raw data from the Winget & Kozlowski 1965 paper.<br><br>CL: Please clarify why the plots were dropped or excluded from carbon computation. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) Winget_1965.pdf is on dropbox for your review<br>2) The cruisers marked plots 175, 176, 177, 179, 180 as non-forest, and they were thus cut out of the project area and the carbon quantification. |
| **Aster Findings - Round 2 (01 September 2022)** | 1. The audit team reviewed the provided paper. It is unclear to the audit team how the values used to degrow inventory data in PC378_WL05_Degrowth_2022_06_14.xlsx were obtained from the provided paper.<br>2. Thank you for the clarification. The audit team acknowledges theses plots were appropriately dropped as they are non-forest. |
| **Round 2 NCR /CL/OFI** | CL: Please clarify how the values used to degrow inventory data were obtained from the provided paper. |
| **Round 2 Response from Project Proponent (22 September 2022)** | File WK_1965_LINEAR_INTERPOLATED_CURVES.xlsx has been added to dropbox in the Additional Materials folder. This file has the raw data from the paper. This data was averaged by week (some weeks had observations in 2 years) to compute the multipliers. |
| **Aster Findings - Round 3 (insert date)** | Thank you for providing the additional data. The audit team reviewed the additional file and is reasonably assured the degrow has performed appropriately. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | The Project Proponent must use the same set of equations, diameter at breast height thresholds, and selected biomass components for ex ante and ex post baseline and project estimates. |
| **Applicability to the Project (Y or N/A)** | Y |

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| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | FVS, Quantification workbooks |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | The same set of equations for determining values in the Tab E5.1,.2 tab of the PC378_WL14_ERTs_v3_20210818 are not used in determining values in the AG+BG Live Tree row. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please update the quantification workbook, all downstream calculations and the GHG Plan to satisfy this requirement of the methodology. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) Live carbon AG and BG is computed by FVS in all cases. |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team has reviewed the response and the related workbook. The item has been addressed. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | Dead wood included in the methodology comprises two components only – standing dead wood and lying dead wood. |

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| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL03_FVS_AvgDefect_20210810.xlsx |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | Only standing dead wood is included. The audit team noted an error in Table E1.1.10 of the GHG Plan. Specifically the last column of this table does not match the workbook specified in the GHG plan. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please update the GHG Plan to ensure that the GHG plan is up-to-date and report all values correctly. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) This will be corrected in the document once all findings are resolved and documented in the GHG plan. |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the updated GHG Plan and noted, that in line with the Project Proponent's response, a number of tables have not been updated. The previous item will be reissued and remain open as all GHG tables are not in line with provided materials. |
| **Round 2 NCR /CL/OFI** | CL: Please update the GHG Plan to ensure that the GHG plan is up-to-date and report all values correctly. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The GHG plan has been updated on page 49. |
| **Aster Findings - Round 3 (insert date)** | The audit team reviewed the updated GHG Plan and confirmed that the table has been appropriately updated. However, the audit team noted that table E5.1 incorrectly reports the HWPs per year. |
| **Round 3 NCR /CL/OFI** | CL: Please ensure that all values reported in the GHG plan are accurate. |

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| **Round 3 Response from Project Proponent (DD Month YYYY)** | |
| **Aster Findings - Round 4 (insert date)** | The project did not provide a finding response, so the same finding has been issued again.<br><br>The audit team reviewed the updated GHG Plan and confirmed that the table has been appropriately updated. However, the audit team noted that table E5.1 incorrectly reports the HWPs per year. |
| **Round 4 NCR /CL/OFI** | CL: Please ensure that all values reported in the GHG plan are accurate. |
| **Round 4 Response from Project Proponent (DD Month YYYY)** | The GHG plan has had all tables and charts updated. |
| **Aster Findings - Round 5** | The VVB reviewed the updated GHG Plan and confirmed the reported changes. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | a. Baseline harvested wood quantities and species are derived from modeling a baseline harvesting scenario using an approved growth model. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |

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| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | FVS / PC378_WL12_LPA_Baseline_v3_20210810.xlsb |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | The amount of carbon in trees harvested is determined from FVS projection (FVS-LS Fire and Fuels Extension cutlist) based on developed baseline scenario.<br><br>1. It is unclear to the audit team how values in the INV_MBF tab of the PC378_WL12_LPA_Baseline_v3_20210810 workbook are appropriate for the "999999" prescriptions.<br><br>2. It is unclear to the audit team how values in the Cut_STMPG tab of the PC378_WL12_LPA_Baseline_v3_20210810 workbook are determined.<br><br>3. It is unclear to the audit team what the basis for the equations applied in cells JW13:14 in the MODEL tab of the PC378_WL12_LPA_Baseline_v3_20210810 workbook are. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL1: Please clarify in line with the finding and update the quantification workbooks and all downstream calculations.<br><br>CL2: Please provide clear documentation to allow the VVB to understand how the values in the Cut_STMPG tab were derived.<br><br>3. Please clarify in line with finding 3 and if necessary update the quantification workbooks and all downstream calculations. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) The protocol does not require reporting inventory board feet. The no-cut 999999 Rxs were inadvertanly run without board foot defect. The formulas refered to in the protocol are to estimate the net board feet of inventory for client reporting purposes only.<br>2) The stumpage prices per species are in an Access table, and that table is in a query with FVS_CutList to compute total revenue as the sum of the per species $/mbf and mbf of that species, over all species.<br>3) Cells JW14:14 are used to compute the % of growth harvested on a CO2 basis, for client reporting, and do not impact the LP solution. |

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| **Aster Findings - Round 2 (01 September 2022)** | 1. The audit team reviewed the provided response and noted that the board feet inventory is not used for the protocol requirements, making this item N/A.<br>2. The audit team noted a crosstab query within the Access files, however noted that the results were null for two of the access files. Please clarify how the values determined were presented. Further GHG values applied appear to be different between the provided access files. It is unclear why the stumpage values are applied are different for the different files. Related, the audit team is unclear why an average of reported Timber Mart North values is appropriate, where plots modeled are in different states and different effective markets.<br>3. The audit team understands that the cells in JW14:14 are not used and this is therefore, not applicable. |
| **Round 2 NCR /CL/OFI** | CL: Please address verifier item 2 findings. |
| **Round 2 Response from Project Proponent (22 September 2022)** | Query stumpage__2 generates the data found on LP tab [Cut_STMPG]. In 2 of the 3 yield DBs the 1st decade values are zero, but the later values, in columns off the screen to the right have non-zero values.<br><br>Timber Mart North provides data for all 3 states the project is in. File PC378_WL11_Stumpage_20210723.xlsx has the stumpage for each of the 3 states the project is in; in columns G, J, and N. Due to the lack of sales in some states for some species, aka limited data, SIG determined it prudent to average stumpage across states. This data can be found in table tblLkupStumpage, which is identical in all 3 yield files.<br><br>The verifier writes, 'Further GHG values applied appear to be different between the provided access files.' SIG is unclear on this sentence's relevance in this finding as it does not refer to stumpage. |
| **Aster Findings - Round 3 (insert date)** | 1. Thank you for the clarification. This finding is closed.<br><br>2. The audit team reviewed the WL11 workbook and confirmed that the species prices in this workbook were quantified appropriately.<br><br>3. It is unclear to the audit team why AB_HRV_CO2e values (columns JW:KG in the Model tab of the PC378_WL12_LPA_Baseline_PB_2022_09_14.xlsx) are only used out to 2030 and not through the entire 20 modeling period that ultimately feeds the ERT workup in the WL14 workbook. |
| **Round 3 NCR /CL/OFI** | CL: Please clarify in line with the findings. |
| **Round 3 Response from Project Proponent (DD Month YYYY)** | Please see response #3. |

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| **Aster Findings - Round 4 (insert date)** | The audit team reviewed and noted the project's response.<br><br>It is unclear to the audit team why the value in Cell S19 (1,026,426) in the Tot_ERTs tab of the PC378_WL14_ERTs_PB_2022_11_17.xlsx workbook does not match the value in cell GS5 from the Model tab of the PC378_WL12_LPA_Project_NoCut_PB_2022_11_17.xlsx workbook.<br><br>The audit team reviewed the updated WL14 workbook and found that the project incorrectly calculates Year T and therefore the ACR ERT Ex-ante calcs are not correct. |
| **Round 4 NCR /CL/OFI** | CL: Please clarify in line with the finding and if necessary update quantification workbooks and all reporting documents. |
| **Round 4 Response from Project Proponent (DD Month YYYY)** | In response to cell S19: This has been corrected in file PC378_WL14_ERTs_PB_2022_12_20.xlsx. In response to ACR ERT Ex-ante SIG has reviewed this finding and finds no issue with year T in file PC378_WL14_ERTs_PB_2022_12_20.xlsx which uses the equations in the ACR IFM1.3 template, which compute year 2024 as the last year with Reduction credits. |
| **Aster Findings - Round 5** | Thank you for the clarification. The VVB reviewed the updated ERT workbook and confirmed the ERT workup is now correct. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | If a verified report cannot be obtained, looking up default wood product classes for the project's Assessment Area, as given in the most current Assessment Area Data File found on the Reference Documents section of this methodology's website. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |

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| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL14_ERTs_v3_20210818.xlsx |
| **Validation or Verification or Both** | Val/Ver |
| **Findings - Round 1 (01 March 2022)** | The audit team reviewed the HWP tab of the PC378_WL14_ERTs_v3_20210818.xlsx and project shapefiles. The project area appears to span multiple supersections and it is unclear to the audit team how this is accounted for in the calculation of wood products as the values of wood products generated uses a single supersection. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please clarify in line with the finding or update the HWPs calculation, all downstream calculations, and the GHG Plan. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) The harvest by supersection has been tracked, HWPs are now based on the average wood products %s |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team confirmed the appropriate supersections have been included and appropriately averaged. However, the audit team noted that the GHG Project Plan was not updated to include the newly added supersections. |
| **Round 2 NCR /CL/OFI** | CL: Please update the GHG plan to include the newly updated supersections. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The GHG plan has been updated on page 51. |
| **Aster Findings - Round 3 (insert date)** | The audit team confirmed that the GHG Plan correctly reports the newly updated supersections. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | Equation (10) |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL14_ERTs_v3_20210818.xlsx |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | The audit team reviewed the calculation of uncertainty and found that the incorrect t-value is applied. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please update the uncertainty calculation to use the correct t-value. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) SIG did not include the 20-year average value of GHG emmisions in the uncertaintly calculation because no burning was modeled. See email from local forest Justin. |

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| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the provided response and it is unclear how it addresses the finding and clarification request. Additionally, the audit team noted the incorrect t-value is still incorrectly sourced. Specifically, the audit team noted that a value of 1.645 was applied in the determination of the confidence interval. It is unclear the use of this value is appropriate given 151 plots were sampled. |
| **Round 2 NCR /CL/OFI** | CL: Please update the uncertainty calculation to use the correct t-value in line with the finding. |
| **Round 2 Response from Project Proponent (22 September 2022)** | SIG updated the t value to 1.655076 per https://goodcalculators.com/student-t-value-calculator/ for 151 plots. This value is in cells M20, M42, S16, S35 on tab CO2Stats of file PC378_WL06_May2020_PlotAvgs_PB_2022_09_08.xlsx. |
| **Aster Findings - Round 3 (insert date)** | The audit team reviewed the updated workbook and confirmed that the appropriate t-value is applied. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | Equation (18) |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL06_FVS_May2020_PlotAvgs_20210729.xlsx / PC378_WL14_ERTs_v3_20210818.xlsx |

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| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | The audit team reviewed the calculation of uncertainty and found that the incorrect t-value is applied. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please update the uncertainty calculation to use the correct t-value. |
| **Round 1 Response from Project Proponent (21 June 2022)** | 1) SIG did not include the 20-year average value of GHG emmisions in the uncertaintly calculation because no burning was modeled. See email from local forest Justin. |
| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the provided response and it is unclear how it addresses the finding and clarification request. Additionally, the audit team noted the incorrect t-value is still incorrectly sourced. Specifically, the audit team noted that a value of 1.645 was applied in the determination of the confidence interval. It is unclear the use of this value is appropriate given 151 plots were sampled. |
| **Round 2 NCR /CL/OFI** | CL: Please update the uncertainty calculation to use the correct t-value in line with the finding. |
| **Round 2 Response from Project Proponent (22 September 2022)** | SIG updated the t value to 1.655076 per https://goodcalculators.com/student-t-value-calculator/ for 151 plots. This value is in celss M20, M42, S16, S35 on tab CO2Stats of file PC378_WL06_May2020_PlotAvgs_PB_2022_09_08.xlsx. |
| **Aster Findings - Round 3 (insert date)** | The audit team reviewed the updated workbook and confirmed that the appropriate t-value is applied. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands -** | The Project Proponent must make an ex ante calculation of all net anthropogenic GHG removals and emissions for all included sinks and sources for the entire Crediting Period. |

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| **Version 1.3 April 2018** | |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL14_ERTs_v3_20210818.xlsx |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | The relevant information is contained in "PC378_WL14_ERTs_v3_20210818.xlsx".<br><br>The audit team reviewed the workbook and it is unclear why "smoothed" estimates of carbon stocking are applied for some years but not others used in the workup of ex-ante estimates. To be clear, the interpolation between FVS output years is appropriate but there appears to be additional smoothing and it is unclear why the implementation of these values is different depending on year. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please clarify in line with the finding. |
| **Round 1 Response from Project Proponent (21 June 2022)** | The Wolflands baseline modeled yields in FVS for merchantable and submerchantable plots with a TIMEINT of 1, for annual results. After the first decade, the modeling period is five years. However, FVS does not generate pre-harvest carbon metrics, only post harvest. Therefore, the standard procedure is to set the start of the decade to the FVS output carbon values, and the middle of the decade to the average of the start decade values it is between. This models a smooth annual change in stocking over the decade's years. This is appropriate because harvest is modeled taking place in the middle of the decade, and the total is assusmed to happen equally over the decade. |

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| **Aster Findings - Round 2 (01 September 2022)** | The audit team reviewed the response and are unclear where the standard procedure applied is defined within the methodology or similar document, for the application of smoothing over the 5 year period. |
| **Round 2 NCR /CL/OFI** | CL: Please provide evidence to support the approach as a standard method, otherwise provide guidance from ACR that a smoothing approach, is allowable. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The simple math of using the average of the beginning of decade and end of decade stocking for estimating mid-decade stocking when the full decade's harvest is modeled in a single year in the middle of the decade, is the only mathematical operation that can be used given that the mid-decade harvest covers ten annual years of harvest. Looking at MBF in 2030 (FM15) the model reports 14,277, five years later in the model it has grown to 18,810, and a decades worth of harvest is cut, and then to forest grows to 12,305. However, in reality, the modeled cut in 2035 takes palce in 2031, 2032, 2033 etc, so that by 2035, there is much less than 18,810. The 'reality' number is in row 16 and is 13,291, aka the average of 14,277 and 18,810.<br><br>The mid-decade AG CO2 is handled the same way, but for this metric, FVS outputs the POST harvest C after modeling a decade of harvest in 1 year. The 2030 AG is 294,319 and 2035 is 249,307 but in reality after 5 annual harvests it is really 311,693 aka the average of 2030 and 2040 stocking. |
| **Aster Findings - Round 3 (insert date)** | Thank you for the clarification. After a review of the project and baseline workbooks, the audit team is reasonably assured this approach is in line with the methodology. |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | DCBSL,t Change in the baseline carbon stock and GHG emissions (in metric tons CO2e) for year t. (Section C3) |

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| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL14_ERTs_v3_20210818.xlsx, Section VI-1 of Monitoring Report |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | |
| **Round 1 NCR/CL/OFI (01 March 2022)** | |
| **Round 1 Response from Project Proponent (21 June 2022)** | |
| **Aster Findings - Round 2 (01 September 2022)** | ΔCBSL,t is correctly applied to calculate ERT. However, it is unclear to the audit team why the value in Section VI-1 of the Monitoring Report is not consistent with the value applied in calculation. |
| **Round 2 NCR /CL/OFI** | CL: Please provided clarification regarding the discrepancy between the ΔCBSL,t value used in calculation of ERTs and the ΔCBSL,t value reported in Section VI-1 of the Monitoring Report. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The Monitoring Report has been updated. |
| **Aster Findings - Round 3 (insert date)** | The audit team reviewed the updated MR and confirmed that the MR now correctly reports baseline values. **This finding is closed.** |

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| **ACR - Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands - Version 1.3 April 2018** | BUF The non-permanence buffer deduction as calculated in Section B5. BUF will be set to zero if an ACR approved insurance product is used. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | PC378_WL14_ERTs_v3_20210818.xlsx, Section VI-4 of Monitoring Report |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | |
| **Round 1 NCR/CL/OFI (01 March 2022)** | |
| **Round 1 Response from Project Proponent (21 June 2022)** | |
| **Aster Findings - Round 2 (01 September 2022)** | BUF is correctly applied to calculate ERT. However, Section VI-4 of the Monitoring Report states the buffer contribution is 24% in one place and 18% in the other. |

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| **Round 2 NCR /CL/OFI** | CL: Please update the Monitoring Report to include only the appropriate buffer pool contribution. |
| **Round 2 Response from Project Proponent (22 September 2022)** | The correct buffer percent, with Fire at 2% is 18%. This has been updated in the ERT file and Monitoring Report. |
| **Aster Findings - Round 3 (insert date)** | The VVB is going to take this issue to ACR, discussed this issue with ACR and ACR confirmed that the project proponent is correct. The VVB will issue a FAR to ensure the risk score is re-analyzed at the next verification. This finding is closed. |

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| **ACR AGGREGATION AND PROGRAMMATIC DEVELOPMENT APPROACH GUIDANCE FOR IMPROVED FOREST MANAGEMENT Version 1.0 January 2021** | Assess general and Site-specific risk factors. A weighted risk rating shall be evaluated across all participating Sites and applied at the Aggregate level; |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | |
| **Validation or Verification or Both** | |
| **Findings - Round 1 (01 March 2022)** | It is unclear how this was carried out. |

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| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please demonstrate how the risk rating was weighted across all participating sites and applied at the PDA level. This is related to other Findings issued under the ACR Standard requirements. |
| **Round 1 Response from Project Proponent (21 June 2022)** | Language added to section B8. "The calculated risk score for the reporting period is applied in aggregate to all acres within the project. The same enrolled lands are currently being subject to validation and verification. The risk score will be revisited at subsequent verifications as described in the applicable ACR Standards and reevaluated when additional sites are included in the carbon project." |
| **Aster Findings - Round 2 (01 September 2022)** | The language added to Section B8 of the GHG Plan adds sufficient clarification that the risk rating was applied at the aggregate level. The appropriateness of this designation can be further confirmed in review of the project's applicability of the risk tool. This item is addressed here. |

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| **ACR Tool for Risk Analysis and Buffer Determination V1.0** | E - Fire |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan Part B6 |
| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | A 2% fire risk was applied. According to the USFS Wildfire Hazard potential map, the project areas are located in areas with very low or low fire potential. |
| **Round 1 NCR/CL/OFI (01 March 2022)** | |
| **Round 1 Response from Project Proponent (21 June 2022)** | |

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| **Aster Findings - Round 2 (01 September 2022)** | The V/V team understands that the project carbon stocks were impacted by a large wildfire in the fall of 2021. For the fire natural disaster risk, the ACR Tool for Risk Analysis and Buffer Determination V1.0 states the risk value is "8% if project is located in an area where fire greater than 1000 acres has occurred within 30 mile radius of project area in prior 12 months." As the wildfire that impacted the project area was greater than 1000 acres, the provided risk value of 2% is not appropriate. |
| **Round 2 NCR /CL/OFI** | NCR: Please update the risk value for fire in line with the ACR Tool for Risk Analysis and Buffer Determination and update all downstream calculations. |
| **Round 2 Response from Project Proponent (22 September 2022)** | According to the ACR Risk Tool, the appropriate fire risk score to apply is 2% if the project is located in a low fire risk region or 4% if project is located within a high fire risk region. The USFS Fire Risk Map shows and confirms that 70% of the project area is in the very low category, 18% of the project area is in the low risk category, 7% of the project area is in the moderate class, and only 3% of project area acres can be considered as having high fire risk. Since 88% of the project area acres are classified as having low to very low fire risk, the appropriate risk score to apply is 2%.<br><br>The 8% risk value is applicable "if project is located in an area where fire greater than 1000 acres has occurred within 30-mile radius within the prior 12 months." Reporting period 1 (5/20/2020-5/20/2021) currently undergoing verification did not experience fire activity within 30 miles of the project area within those dates, or the prior 12 months. An unusual fire event occurred between August 2021 and October 2021 |
| **Aster Findings - Round 3 (insert date)** | The VVB is going to take this issue to ACR, discussed this issue with ACR and ACR confirmed that the project proponent is correct. The VVB will issue a FAR to ensure the risk score is re-analyzed at the next verification. This finding is closed. |

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| **ACR Tool for Risk Analysis and Buffer Determination V1.0** | F - Disease and Pests |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD, MR or Supporting Documents** | GHG Plan Part B6 |

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| **Validation or Verification or Both** | Verification |
| **Findings - Round 1 (01 March 2022)** | The 4% default was applied. According to the GHG Plan, the project area has not experienced any disease or insect outbreaks; however, no evidence has been provided to the VVB that demonstrates that an "epidemic disease or infestation is present within project area, or within 30 mile radius of project area." |
| **Round 1 NCR/CL/OFI (01 March 2022)** | CL: Please provide evidence to support the risk score claimed in the GHG Plan or update the risk score for Disease and Pests.<br><br>CL: Please add language to the GHG Plan that fully addresses the determinants of the risk score for Disease and Pests. |
| **Round 1 Response from Project Proponent (21 June 2022)** | "In response to the finding, the National Insect and Disease Risk Map (2012 NIDRM composite risk map - https://usfs.maps.arcgis.com/apps/webappviewer/index.html?id=52cb2bcc3c2b4868ac87b66f622062ab) was queried. This dataset represents a nationwide assessment of the proportion of forested area within a HUC-12 watershed that has been damaged by insects and diseases. The Watershed Summary shows 1-4% of the forested area within the project area is at risk."<br><br>This language has been added to the GHG Plan to support the selected ACR risk tool value. |
| **Aster Findings - Round 2 (01 September 2022)** | The V/V team reviewed the National Insect and Disease Risk Map and noted the project correctly asserts it falls into the lowest risk category for pests and disease. Further, the GHG Plan has been updated to include this information. The 4% default score is appropriate. This item is addressed. |

# Appendix B – List of Documents Received and Reviewed by Aster Global

| Document Name | Date Received |
|---|---|
| WolfLand-listing form-SIGNED.pdf | 3/19/2021 |
| Shared folder directory and change log.docx | 3/26/2021 |
| Wolf Lands Carbon inventory manual_ _final_20210226 copy.pdf | 3/26/2021 |
| Wolflands_GHGPlan_draft_20210322 copy.docx | 3/26/2021 |
| WolfLands_PlotGrid_20210225.cpg | 3/26/2021 |
| WolfLands_PlotGrid_20210225.dbf | 3/26/2021 |
| WolfLands_PlotGrid_20210225.prj | 3/26/2021 |
| WolfLands_PlotGrid_20210225.sbn | 3/26/2021 |
| WolfLands_PlotGrid_20210225.sbx | 3/26/2021 |
| WolfLands_PlotGrid_20210225.shp | 3/26/2021 |
| WolfLands_PlotGrid_20210225.shp.LAPTOP-DHLK9V13.24852.23772.sr.lock | 3/26/2021 |
| WolfLands_PlotGrid_20210225.shp.xml | 3/26/2021 |
| WolfLands_PlotGrid_20210225.shx | 3/26/2021 |
| WolfLands_PlotGrid_forinventory_20210225.shp.xml | 3/26/2021 |
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| a00000001.gdbindexes | 3/26/2021 |
| a00000001.gdbtable | 3/26/2021 |
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| a00000002.gdbtablx | 3/26/2021 |
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| a00000003.gdbtable | 3/26/2021 |
| a00000003.gdbtablx | 3/26/2021 |
| a00000004.CatItemsByPhysicalName.atx | 3/26/2021 |
| a00000004.CatItemsByType.atx | 3/26/2021 |
| a00000004.FDO_UUID.atx | 3/26/2021 |
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| a00000004.gdbindexes | 3/26/2021 |
| a00000004.gdbtable | 3/26/2021 |
| a00000004.gdbtablx | 3/26/2021 |
| a00000004.horizon | 3/26/2021 |
| a00000004.spx | 3/26/2021 |
| a00000005.CatItemTypesByName.atx | 3/26/2021 |
| a00000005.CatItemTypesByParentTypeID.atx | 3/26/2021 |
| a00000005.CatItemTypesByUUID.atx | 3/26/2021 |
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| a00000005.gdbtable | 3/26/2021 |
| a00000005.gdbtablx | 3/26/2021 |

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| a00000006.CatRelsByOriginID.atx | 3/26/2021 |
| a00000006.CatRelsByType.atx | 3/26/2021 |
| a00000006.FDO_UUID.atx | 3/26/2021 |
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| a00000006.gdbtable | 3/26/2021 |
| a00000006.gdbtablx | 3/26/2021 |
| a00000007.CatRelTypesByBackwardLabel.atx | 3/26/2021 |
| a00000007.CatRelTypesByDestItemTypeID.atx | 3/26/2021 |
| a00000007.CatRelTypesByForwardLabel.atx | 3/26/2021 |
| a00000007.CatRelTypesByName.atx | 3/26/2021 |
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| a00000007.CatRelTypesByUUID.atx | 3/26/2021 |
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| a00000009.gdbtable | 3/26/2021 |
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| ownershipboundary_20210226.dbf | 3/26/2021 |
| ownershipboundary_20210226.prj | 3/26/2021 |
| ownershipboundary_20210226.sbn | 3/26/2021 |

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| ownershipboundary_20210226.shp | 3/26/2021 |
| ownershipboundary_20210226.shp.xml | 3/26/2021 |
| ownershipboundary_20210226.shx | 3/26/2021 |
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| WolfLands_PlotGrid_updated20210326.dbf | 3/26/2021 |
| WolfLands_PlotGrid_updated20210326.prj | 3/26/2021 |
| WolfLands_PlotGrid_updated20210326.sbn | 3/26/2021 |
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| WolfLands_Plots_Strata_20210326.shx | 3/26/2021 |
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| PC378_WL01_GIS_Plot_Attrs__20210322.xlsx | 3/26/2021 |
| PC378_WL03_CruiseRecs_2021026.accdb | 3/26/2021 |
| PC378_WL04_FVS_AvgCFDefect_20210324.xlsx | 3/26/2021 |
| PC378_WL05_FVS_March2021_PlotAvgs_20210325.xlsx | 3/26/2021 |
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| Wolflands_strata_polys_draft20210329.dbf | 3/31/2021 |
| Wolflands_strata_polys_draft20210329.prj | 3/31/2021 |
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| Wolflands_strata_polys_draft20210329.sbx | 3/31/2021 |
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| Wolflands_strata_polys_draft20210329.shx | 3/31/2021 |
| Shared folder directory and change log.docx | 8/24/2021 |
| 2021_WolfLands_FMP_05182021.pdf | 8/24/2021 |
| Wolf_Lands_MgmtPlan_Tract_locators_compressed.pdf | 8/24/2021 |
| Certificate - Michigan.pdf | 8/24/2021 |
| Certificate - Minnesota.pdf | 8/24/2021 |
| Certificate - Wisconsin.pdf | 8/24/2021 |
| Green Timber Tree Farm Group - Certificate 5-29-26.pdf | 8/24/2021 |
| ownershipboundary_20210226.cpg | 8/24/2021 |

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| a00000007.CatRelTypesByDestItemTypeID.atx | 8/24/2021 |
| a00000007.CatRelTypesByForwardLabel.atx | 8/24/2021 |
| a00000007.CatRelTypesByName.atx | 8/24/2021 |
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| a0000000e.spx | 8/24/2021 |

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| Wolf Lands Carbon inventory manual_ _final_20210226 copy.pdf | 8/24/2021 |
| PC287_WL00_BoundaryPlotMath.txt | 8/24/2021 |
| PC332_WS_Quant_Files_20210325.docx | 8/24/2021 |
| PC378_WL00_Carbon_TreeList_03172021.xlsx | 8/24/2021 |
| PC378_WL01_GIS_Plot_Attrs__20210322.xlsx | 8/24/2021 |
| PC378_WL03_CruiseRecs_2021026.accdb | 8/24/2021 |
| PC378_WL03_CruiseRecs_20210408.accdb | 8/24/2021 |
| PC378_WL04_FVS_AvgCFDefect_20210324.xlsx | 8/24/2021 |
| PC378_WL05_FVS_March2021_PlotAvgs_20210325.xlsx | 8/24/2021 |
| PC378_WL05_FVS_March2021_PlotAvgs_20210407.xlsx | 8/24/2021 |
| Wolflands_GHGPlan_081621.pdf | 8/24/2021 |
| GTCF-Wolf Lands_Consulting Services Addendum.jpg | 8/24/2021 |
| 10_1969-birch_tubbs_p74-78.pdf | 8/24/2021 |
| frn_ne27_clearcuttingRegnBartlett.pdf | 8/24/2021 |
| GTCF_WolfLands_Carbon_TreeList_03172021.xlsx | 8/24/2021 |
| gtr_nrs132_SilvGuideNWHdWds.pdf | 8/24/2021 |
| PC378_WL_Quant_Files_20210812.docx | 8/24/2021 |
| PC378_WL00_Carbon_TreeList_20210628.xlsx | 8/24/2021 |
| PC378_WL01_GIS_Plot_Attrs__20210629.xlsb | 8/24/2021 |
| PC378_WL02_SiteIndexforPlots_20210621.xlsx | 8/24/2021 |
| PC378_WL03_FVS_AvgDefect_20210810.xlsx | 8/24/2021 |
| PC378_WL04_FVS_March2021_PlotAvgs_20210719.xlsx | 8/24/2021 |
| PC378_WL05_Degrowth_20210719.xlsx | 8/24/2021 |
| PC378_WL06_FVS_May2020_PlotAvgs_20210729.xlsx | 8/24/2021 |
| PC378_WL07_RxInputs_20210710.xlsx | 8/24/2021 |
| PC378_WL08_RxRegn_1YrMlts_20210710.xlsx | 8/24/2021 |
| PC378_WL08_RxRegn_5YrMlts_20210710.xlsx | 8/24/2021 |
| PC378_WL09_1Yrto5Yr_BAImults_20210613.xlsx | 8/24/2021 |
| PC378_WL10_FIA_BdFt_Defect_20210513.xlsx | 8/24/2021 |
| PC378_WL11_Stumpage_20210723.xlsx | 8/24/2021 |
| PC378_WL12_LPA_Baseline_v3_20210810.xlsb | 8/24/2021 |
| PC378_WL13_LPA_Project_NoCut_20210801.xlsb | 8/24/2021 |
| PC378_WL14_ERTs_v3_20210818.xlsx | 8/24/2021 |
| PC378_WL16_Monitoring_Report_20210817.xlsx | 8/24/2021 |
| rp_nc150_NaturalRegnOfNHdWd_greatLakes.pdf | 8/24/2021 |

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|---|---|
| rp85_clearcutting_NHWD.pdf | 8/24/2021 |
| stumpageprices_TimberMartNorthvolVol 27 No 1.pdf | 8/24/2021 |
| PC378_RxsCCs_1yr1stDecade01_FILES_20210726.7z | 8/24/2021 |
| PC378_RxsCCs_1yr1stDecade02_FILES_20210726.7z | 8/24/2021 |
| PC378_RxsCCs_1yrOtrDecades_FILES_20210722.7z | 8/24/2021 |
| PC378_RxsCCs_5yrAllDecades_FILES_20210722.7z | 8/24/2021 |
| PC378_WL03_CruiseRecs_20210726.7z | 8/24/2021 |
| PC378_WL03_ProjectStart_20210726.7z | 8/24/2021 |
| RegnMults_1Yr.7z | 8/24/2021 |
| RegnMults_5Yr.7z | 8/24/2021 |
| Test1stDeacadeMults.7z | 8/24/2021 |
| Wolflands _Monitoring Report_RP1_20210819.pdf | 8/24/2021 |
| Wolflands_MN properties_deeds.pdf | 8/24/2021 |
| WolfLands_Ontonagon_MI_Tax_Details.pdf | 8/24/2021 |
| Harper, Wolfwood March 2004.pdf | 8/24/2021 |
| Limmex, Burkhalter, Wolfwood July 2018.pdf | 8/24/2021 |
| LL&M Enterprises, Wolfwood February 2017.pdf | 8/24/2021 |
| Lloyd, Michael, Michele Purnell, Wolfwood February 2017.pdf | 8/24/2021 |
| plat maps.pdf | 8/24/2021 |
| Portz, Wolflands.pdf | 8/24/2021 |
| Stoll, Wolfwood 14 September 2001.pdf | 8/24/2021 |
| Walsh, Wolf Lands 12 September 2008.pdf | 8/24/2021 |
| VerifierMeet_20211012.docx | 10/12/2021 |
| StepOneQuant.png | 10/13/2021 |
| StepThreeQuant.png | 10/13/2021 |
| StepTwoQuant.png | 10/13/2021 |
| Quant_3steps_20211021.png | 10/21/2021 |
| 21080.00 SIG Wolf Lands Round 1 NCRs CLs_SIG_Response_2022_03_01.xlsx | 5/4/2022 |
| Findings_01.txt | 5/4/2022 |
| PC378_WL12_LPA_Baseline_v3_F1_2022_04_20.xlsb | 5/4/2022 |
| PC378_WL14_ERTs_v3_F1_2022_04_20.xlsx | 5/4/2022 |
| PC378_WL16_Monitoring_Report_2022_04_20.xlsx | 5/4/2022 |
| PC378_WL17_CCvolsInBaselineSoln_2022_04_20.xlsx | 5/4/2022 |
| Wignet & Kozlowski 1965_seasonal basal area as an expression of competition.pdf | 5/4/2022 |
| Wolflands _Monitoring Report_RP1_20220505.pdf | 5/4/2022 |
| Wolflands_GHGPlan_20220505.pdf | 5/4/2022 |
| WL 1_Cover Sheet & Org Chart.jpg | 5/4/2022 |
| WL 10_Minutes (Wolfwood Corporation).jpg | 5/4/2022 |
| WL 11_Minutes cont'd (Wolfwood Corporation).jpg | 5/4/2022 |
| WL 2_Org Chart & Certificate of Incorporation (Wolf Lands, Inc.).jpg | 5/4/2022 |
| WL 3_Articles of Incorporation (Wolf Lands Wisconsin, Inc.).jpg | 5/4/2022 |
| WL 4_Articles of Incorporation (Wolf Lands, Inc.).jpg | 5/4/2022 |

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| WL 5_WI Dept of Revenue Email (Wolfwood Corporation).jpg | 5/4/2022 |
| WL 6_Evidence of Ownership Email.jpg | 5/4/2022 |
| WL 7_Articles of Incorporation (Wolfwood Corporation).jpg | 5/4/2022 |
| WL 8_Certificate of Incorporation (Wolfwood Corporation).jpg | 5/4/2022 |
| WL 9_Waiver of Notice & Certificate of Incorporation (Wolfwood Corporation).jpg | 5/4/2022 |
| Wolflands _Monitoring Report_RP1_20220621_draft.pdf | 6/21/2022 |
| Wolflands_GHGPlan_20220621_draft.pdf | 6/21/2022 |
| PC378_WL_Quant_Files_2022_06_14.docx | 6/21/2022 |
| PC378_WL00_Carbon_FireList_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL00_Carbon_TreeList_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL00_FVSin_Cruise_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL00_FVSin_Cruise_2022_06_14v.xlsx | 6/21/2022 |
| PC378_WL00_FVSkey_Cruise_2022_06_14.txt | 6/21/2022 |
| PC378_WL00_FVSout_Cruise_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL01_GIS_Plot_Attrs__2022_06_14.xlsb | 6/21/2022 |
| PC378_WL02_SiteIndexforPlots_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL03_FVS_AvgDefect_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL04_March2021_PlotAvgs_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL05_Degrowth_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL06_FVSin_ProjStart_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL06_FVSin_ProjStart_2022_06_14v.xlsx | 6/21/2022 |
| PC378_WL06_FVSkey_ProjStart_2022_06_14.txt | 6/21/2022 |
| PC378_WL06_FVSout_ProjStart_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL06_May2020_PlotAvgs_PB_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL12_LPA_Baseline_PB_2022_06_14.xlsb | 6/21/2022 |
| PC378_WL13_LPA_Project_NoCut_PB_2022_06_14.xlsb | 6/21/2022 |
| PC378_WL14_ERTs_PB_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL16_Monitoring_Report_PB_2022_06_14.xlsx | 6/21/2022 |
| PC378_WL17_CCvolsInBaselineSoln_2022_06_14.xlsx | 6/21/2022 |
| 21080.00 SIG Wolf Lands Round 1 NCRs CLs_SIG_Response_20220503.xlsx | 6/21/2022 |
| Wignet & Kozlowski 1965_seasonal basal area as an expression of competition.pdf | 6/21/2022 |
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| Wolflands_strata_polys_draft20210329.shp.xml | 6/23/2022 |
| Wolflands_strata_polys_draft20210329.shx | 6/23/2022 |
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| Certificate - Michigan.pdf | 9/22/2022 |
| Certificate - Minnesota.pdf | 9/22/2022 |
| Certificate - Wisconsin.pdf | 9/22/2022 |
| Green Timber Tree Farm Group - Certificate 5-29-26.pdf | 9/22/2022 |
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| WL 10_Minutes (Wolfwood Corporation).jpg | 9/22/2022 |
| WL 11_Minutes cont'd (Wolfwood Corporation).jpg | 9/22/2022 |
| WL 2_Org Chart & Certificate of Incorporation (Wolf Lands, Inc.).jpg | 9/22/2022 |
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| PC378_WL14_ERTs_PB_2022_11_17.xlsx | 12/1/2022 |
| PC378_WL16_Monitoring_Report_PB_2022_11_17.xlsx | 12/1/2022 |
| PC378_WL17_CCvolsInBaselineSoln_2022_06_14.xlsx | 12/1/2022 |
| RawAG_LP_Yields_2022_11_17.xlsx | 12/1/2022 |
| RawBG_LP_Yields_2022_11_17.xlsx | 12/1/2022 |
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| RawSNAGREGN_LP_Yields_2022_09_08.xlsx | 12/1/2022 |
| PC378_RxsCCs_1yr1stDecade01_FILES_20210726.7z | 12/1/2022 |
| PC378_RxsCCs_1yr1stDecade02_FILES_20210726.7z | 12/1/2022 |
| PC378_RxsCCs_1yrOtrDecades_FILES_20210722.7z | 12/1/2022 |
| PC378_RxsCCs_5yrAllDecades_FILES_20210722.7z | 12/1/2022 |
| PC378_WL03_CruiseRecs_20210726.7z | 12/1/2022 |
| PC378_WL03_ProjectStart_20210726.7z | 12/1/2022 |
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| StepThreeQuant.png | 12/1/2022 |
| StepTwoQuant.png | 12/1/2022 |
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| PC378_WL06_FVSin_ProjStart_2022_06_14v.xlsx | 12/1/2022 |
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| PC378_WL14_ERTs_PB_2022_09_21.xlsx | 12/1/2022 |
| PC378_WL14_ERTs_PB_2022_09_22.xlsx | 12/1/2022 |
| PC378_WL16_Monitoring_Report_PB_2022_06_14.xlsx | 12/1/2022 |
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| PC378_WL04_FVS_March2021_PlotAvgs_20210719.xlsx | 12/1/2022 |
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| PC378_WL00_FVSkey_Cruise_2022_06_14.txt | 12/1/2022 |
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| WL 5_WI Dept of Revenue Email (Wolfwood Corporation).jpg | 12/1/2022 |
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| a00000004.CatItemsByType.atx | 12/1/2022 |
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| a00000006.CatRelsByOriginID.atx | 12/1/2022 |
| a00000006.CatRelsByType.atx | 12/1/2022 |
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| a00000007.CatRelTypesByDestItemTypeID.atx | 12/1/2022 |
| a00000007.CatRelTypesByForwardLabel.atx | 12/1/2022 |
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| RawSNAGPlot_LP_Yields_2022_09_08.xlsx | 12/1/2022 |
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