California Environmental Protection Agency

AIR RESOURCES BOARD

Compliance Offset Protocol
U.S. Forest Projects

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Abbreviations and Acronyms

ARB	Air Resources Board
C	Carbon
CAR	Climate Action Reserve
CH_4	Methane
CO_2	Carbon dioxide
FIA	Forest Inventory and Analysis Program of the U.S. Forest Service
GHG	Greenhouse gas
lb	Pound
IFM	Improved Forest Management
N_2O	Nitrous oxide
Regulation	Cap-and-Trade Regulation, title 17, California Code of Regulations, sections 95800 et seq.
SSR	GHG Sources, GHG Sinks, and GHG Reservoirs
USFS	United States Forest Service

1 Introduction

The Compliance Offset Protocol U.S. Forest Projects (Forest Offset Protocol) provides requirements and methods for quantifying the net climate benefits of activities that sequester carbon on forestland. The protocol provides offset project eligibility rules; methods to calculate an offset project's net effects on greenhouse gas (GHG) emissions and removals of CO_2 from the atmosphere (removals); procedures for assessing the risk that carbon sequestered by a project may be reversed (i.e. released back to the atmosphere); and approaches for long term project monitoring and reporting. The goal of this protocol is to ensure that the net GHG reductions and GHG removal enhancements caused by an offset project are accounted for in a complete, consistent, transparent, accurate, and conservative manner and may therefore be reported as the basis for issuing ARB or registry offset credits. The protocol is built off of The Climate Action Reserve's Forest Project Protocol Version 3.2.[1]

Offset Project Operators or Authorized Project Designees must use this protocol to quantify and report GHG reductions and GHG removal enhancements. The protocol provides eligibility rules, methods to quantify GHG reductions, project-monitoring instructions, and procedures for reporting Offset Project Data Reports. Additionally, all offset projects must submit to independent verification by ARB-accredited verification bodies. Requirements for verification bodies to verify Offset Project Data Reports are provided in the Cap-and-Trade Regulation (Regulation).

AB 32 exempts quantification methodologies from the Administrative Procedure Act (APA)[2]; however those elements of the protocol are still regulatory. The exemption allows future updates to the quantification methodologies to be made through a public review and Board adoption process but without the need for rulemaking documents. Each protocol identifies sections that are considered to be quantification methodologies and exempt from APA requirements. Any changes to the non-quantification elements of the offset protocols would be considered a regulatory update subject to the full regulatory development process. Those sections that are considered to be quantification methodologies are clearly indicated in the title of the chapter or subchapter if only a portion of that chapter is considered part of the quantification methodology.

[1] Climate Action Reserve (CAR 2010) Forest Project Project Protocol Version 3.2. August 31, 2010. http://www.climateactionreserve.org/wpcontent/uploads/2009/03/Forest_Project_Protocol_Version_3.2.pdft/ (accessed September 9, 2010)

[2] Health and Safety Code section 38571.

1.1 About Forests, Carbon Dioxide, and Climate Change

Forests have the capacity to both emit and sequester carbon dioxide (CO_2), a leading greenhouse gas that contributes to climate change. Trees, through the process of photosynthesis, naturally absorb CO_2 from the atmosphere and store the gas as carbon in their biomass, i.e. trunk (bole), leaves, branches, and roots. Carbon is also stored in the soils that support the forest, as well as the understory plants and litter on the forest floor. Wood products that are harvested from forests can also provide long term storage of carbon.

When trees are disturbed, through events like fire, disease, pests or harvest, some of their stored carbon may oxidize or decay over time releasing CO_2 into the atmosphere. The quantity and rate of CO_2 that is emitted may vary, depending on the particular circumstances of the disturbance. Forests function as reservoirs in storing CO_2. Depending on how forests are managed or impacted by natural events, they can be a net source of emissions, resulting in a decrease to the reservoir, or a net sink, resulting in an increase of CO_2 to the reservoir. In other words, forests may have a net negative or net positive impact on the climate.

Through sustainable management and protection, forests can also play a positive and significant role to help address global climate change. The Forest Offset Protocol is designed to address the forest sector's unique capacity to sequester, store, and emit CO_2 and to facilitate the positive role that forests can play to address climate change.

2 Forest Project Definitions and Requirements

For the purposes of this protocol, a Forest Project is a planned set of activities designed to increase removals of CO_2 from the atmosphere, or reduce or prevent emissions of CO_2 to the atmosphere, through increasing and/or conserving forest carbon stocks.

A glossary of terms related to Forest Projects is provided in Section 11 of this protocol. Throughout the protocol, important defined terms are capitalized (e.g. "Reforestation Project"). For terms not defined in Section 11, the definitions in the Regulation apply.

2.1 Project Types

The following types of Forest Project activities are eligible:

2.1.1 Reforestation

A Reforestation Project involves restoring tree cover on land that is not at optimal stocking levels and has minimal short-term (30-years) commercial opportunities. A Reforestation Project is only eligible if it can fully satisfy the eligibility rules in the Regulation and:

1. The project involves tree planting or removal of impediments to natural reforestation, on land that:
    a. Has had less than 10 percent tree canopy cover for a minimum of 10 years; or
    b. Has been subject to a Significant Disturbance that has removed at least 20 percent of the land's above-ground live biomass in trees.
2. No rotational harvesting of reforested trees or any harvesting of pre-existing carbon in live trees occurs during the first 30 years after offset project commencement unless such harvesting is needed to prevent or reduce an imminent threat of disease. Such harvesting may only occur if the Offset Project Operator or Authorized Project Designee provides a written statement from the government agency in charge of forestry regulation in the state where the project is located stipulating that the harvesting is necessary to prevent or mitigate disease.
3. The tree planting, or removal of impediments to natural reforestation, does not follow a commercial harvest of healthy live trees that has occurred in the Project Area within the past 10 years, or since the occurrence of a Significant Disturbance, whichever period is shorter.
4. The offset project does *not* employ broadcast fertilization.
5. The offset project does not take place on land that was part of a previously listed and verified Forest Project, unless the previous Forest Project was terminated due to an Unintentional Reversal (see Section 7) or is an early action offset project transitioning to this protocol according to the provisions of the Regulation and this protocol.
6. If the offset project was an offset project in a voluntary offset program, the offset project can demonstrate it has met all legal and contractual requirements to allow it to terminate its project relationship with the voluntary offset program and be listed using this compliance offset protocol.

Reforestation Projects on both private and public lands, excluding federal lands that are not included in the categories of land listed in section 3.6 of this protocol, are eligible.

2.1.2 Improved Forest Management

An Improved Forest Management Project involves management activities that maintain or increase carbon stocks on forested land relative to baseline levels of carbon stocks, as defined

in Section 6.2 of this protocol. An Improved Forest Management Project is only eligible if it can fully satisfy the eligibility rules in the Regulation and:

1. The offset project takes place on land that has greater than 10 percent tree canopy cover.
2. The offset project employs natural forest management practices, as defined in Section 3.8.2 of this protocol.
3. The offset project does *not* employ broadcast fertilization.
4. The offset project does not take place on land that was part of a previously listed and verified Forest Project, unless the previous Forest Project was terminated due to an Unintentional Reversal (see Section 7) or is an early action offset project transitioning to this protocol according to the provisions of the Regulation and this protocol.
5. If the offset project was an offset project in a voluntary offset program, the offset project can demonstrate it has met all legal and contractual requirements to allow it to terminate its project relationship with the voluntary offset program and be listed using this compliance offset protocol.

Eligible management activities may include, but are not limited to:

- Increasing the overall age of the forest by increasing rotation ages.
- Increasing the forest productivity by thinning, diseased, and suppressed trees.
- Managing competing brush and short-lived forest species.
- Increasing the stocking of trees on understocked areas.
- Maintaining stocks at a high level.

Improved Forest Management Projects on both private and public lands, excluding federal lands that are not included in the categories of land listed in section 3.6 of this protocol, are eligible.

2.1.3 Avoided Conversion

An Avoided Conversion Project involves preventing the conversion of forestland to a non-forest land use by dedicating the land to continuous forest cover through a Qualified Conservation Easement or transfer to public ownership, excluding transfer to federal ownership. An Avoided Conversion Project is only eligible if it can fully satisfy the eligibility rules in the Regulation and:

1. It can be demonstrated that there is a significant threat of conversion of project land to a non-forest land use by following the requirements for establishing the project's baseline in Section 6.3 of this protocol.
2. The offset project does *not* employ broadcast fertilization.
3. The offset project does not take place on land that was part of a previously listed and verified Forest Project, unless the previous Forest Project was terminated due to an Unintentional Reversal (see Section 7) or is an early action offset project transitioning to this protocol according to the provisions of the Regulation and this protocol.
4. If the offset project was an offset project in a voluntary offset program, the offset project can demonstrate it has met all legal and contractual requirements to allow it to terminate its project relationship with the voluntary offset program and be listed using this compliance offset protocol.

An Avoided Conversion Project may involve tree planting and harvesting as part of the project activity.

Avoided Conversion Projects are eligible only on lands that are privately owned prior to offset project commencement.

2.2 Forest Owners

A Forest Owner is the owner of any interest in the real (as opposed to personal) property involved in a Forest Project, excluding government agency third party beneficiaries of conservation easements. Generally, a Forest Owner is the owner in fee of the real property involved in a Forest Project. In some cases, one entity may own the land while another entity may have an interest in the trees or the timber on the property, in which case all entities or individuals with interest in the real property are collectively considered Forest Owners, however, a single Forest Owner must be identified as the Offset Project Operator.

The Offset Project Operator is responsible for undertaking, listing, and verifying a Forest Project, however, all Forest Owner(s) are ultimately responsible for all Forest Project commitments. The Offset Project Operator may identify an Authorized Project Designee pursuant to §95974 of the Regulation, to assist or consult with implementation of the Forest Project. All information submitted to ARB or an Offset Project Registry shall reference the Offset Project Operator and all Forest Owner(s) who are ultimately responsible for the accuracy and completeness of the information submitted.

3 Eligibility Rules and Other Requirements

In addition to the definitions and requirements described in Section 2, Forest Projects must meet several other criteria and conditions to be eligible for listing, and must adhere to requirements in the Regulation and requirements related to duration and crediting periods.

3.1 Additionality

ARB and registry offsets credits must be generated by projects that yield surplus GHG emission reductions or removal enhancements that exceed any GHG reductions or removals otherwise required by law or regulation, or any GHG reduction or removal that would otherwise occur in a conservative Business-As-Usual Scenario. Forest Projects must satisfy the following to be considered additional:

1. Forest Projects must achieve GHG reductions or GHG removal enhancements above and beyond any GHG reductions or GHG removal enhancements that would result from compliance with any federal, state, or local law, regulation or ordinance. Forest Projects must also achieve GHG reductions and GHG removal enhancements above and beyond any GHG reductions or GHG removal enhancements that would result from compliance with any court order or other legally binding mandates, including management plans (such as Timber Harvest Plans) that are required for government agency approval of harvest activities. Legally binding mandates also include conservation easements or deed restrictions, except where such conservation easements have been enacted in support of the Forest Project, as described in Section 3.5. This requirement is assessed through the Legal Requirement Test in 3.1.1.
2. Forest Projects must achieve GHG reductions or GHG removal enhancements above and beyond any GHG reductions or GHG removal enhancements that would result from engaging in Business-As-Usual activities, as defined by the Regulation and the requirements described and assessed through the Performance Test in Section 3.1.2.

3.1.1 Legal Requirement Test

To meet additionality requirements, the following legal requirement test must be met, specific to each type of Forest Project.

3.1.1.1 Reforestation Projects

Reforestation Project activities cannot be legally required (as defined in 3.1 above) at the time of offset project commencement. Modeling of the Forest Project's baseline carbon stocks must reflect all legal constraints, as required in Section 6.1 of this protocol.

3.1.1.2 Improved Forest Management Projects

Improved Forest Management Project activities (defined as management activities intended to maintain or increase carbon stocks relative to baseline levels) cannot be legally required (as defined in 3.1 above) at the time of offset project commencement. Modeling of the Forest Project's baseline carbon stocks must reflect all legal constraints, as required in Section 6.2 of this protocol.

3.1.1.3 Avoided Conversion Projects

Avoided Conversion Project activities cannot be legally required (as defined in 3.1 above) at the time of offset project commencement. Modeling of the Forest Project's baseline carbon stocks must reflect all legal constraints, as required in Section 6.3 of this protocol.

Official documentation must be submitted demonstrating that the type of anticipated land use conversion is legally permissible. Such documentation must fall into at least one of the following categories:

1. Documentation indicating that the current land use policies, including zoning and general plan ordinances, and other local and state statutes and regulations, permit the anticipated type of conversion.
2. Documentation indicating that the Forest Owner(s) obtained all necessary approvals from the governing county to convert the Project Area to the proposed type of non-forest land use (including, for instance, certificates of compliance, subdivision approvals, timber conversion permits, other rezoning, major or minor use permits, etc.).
3. Documentation indicating that similarly situated forestlands within the project's Assessment Area were recently able to obtain all necessary approvals from the governing county, state, or other governing agency to convert to a non-forest land use (including, for instance, certificates of compliance, subdivision approvals, timber conversion permits, other rezoning, major or minor use permits, etc.).

3.1.2 Performance Test

The Performance Test is satisfied if the following requirements are met, depending on the type of Forest Project.

3.1.2.1 Reforestation Projects

A Reforestation Project that occurs on land that has had less than 10 percent tree canopy cover for at least 10 years automatically satisfies the Performance Test.

A Reforestation Project that occurs on land that has undergone a Significant Disturbance satisfies the Performance Test if:

1. The Forest Project corresponds to a scenario in Appendix E, Table E.1, indicating that it is "eligible" (as determined by the requirements and methods in Appendix E); or
2. The Forest Project occurs on a type of land for which the Forest Owner has not historically engaged in or allowed timber harvesting. (Examples of such land include municipal or state parks.)

3.1.2.2 Improved Forest Management Projects

An Improved Forest Management Project automatically satisfies the Performance Test. Project activities are considered additional to the extent they produce GHG reductions and/or GHG removal enhancements in excess of those that would have occurred under a conservative Business-As-Usual Scenario, as defined by the baseline estimation requirements in Section 6.2.1.

3.1.2.3 Avoided Conversion Projects

An Avoided Conversion Project satisfies the Performance Test if a real estate appraisal for the Project Area (as defined in Section 4) is submitted indicating the following:

1. *The Project Area is suitable for conversion*. The appraisal must clearly identify the highest value alternative land use for the Project Area and indicate how the physical characteristics of the Project Area are suitable for the alternative land use.
    a. At a minimum, where conversion to commercial, residential, or agricultural land uses is anticipated, the appraisal must indicate that the slope of Project Area land does not exceed 40 percent.

b. Where conversion to agricultural land use is anticipated, the appraisal must provide:
    i. Evidence of soil suitability for the type of expected agricultural land use.
    ii. Evidence of water availability for the type of expected agricultural land use.
c. Where conversion to mining land use is anticipated, the appraisal must provide evidence of the extent and amount of mineral resources existing in the Project Area, and the commercial viability of mineral extraction.
d. The appraisal must identify specific portions of the Project Area suitable for the identified alternative land use. For example, an appraisal that identified a golf course as an alternative land use must specify the approximate acres suitable for fairways, greens, clubhouses, and outbuildings.

2. *The alternative land use for the Project Area has a higher market value than forestland*. The appraisal for the property must demonstrate that the fair market value of the anticipated alternative land use for the Project Area is at least 40 percent greater than the value of the current forested land use.

Where conversion to residential, commercial, or recreational land uses is anticipated, the appraisal must also describe the following information:

1. The proximity of the Project Area to metropolitan areas.
2. The proximity of the Project Area to grocery and fuel services and accessibility of those services.
3. Population growth within 180 miles of the Project Area.

The appraisal must be conducted in accordance with the Uniform Standards of Professional Appraisal Practice[3] and the appraiser must meet the qualification standards outlined in Internal Revenue Code, Section 170 (f)(11)(E)(ii).[4]

3.2 Offset Project Commencement

The date of offset project commencement for a Forest Project is the date on which an activity is first implemented that will lead to increased GHG reductions or GHG removal enhancements relative to the Forest Project's baseline. The following actions identify offset project commencement for each project type:

- For a Reforestation Project, the action is the planting of trees, the removal of impediments to natural regeneration, or site preparation for the planting of trees, whichever comes first.
- For an Improved Forest Management Project, the action is initiating forest management activities that increase sequestration and/or decrease emissions relative to the baseline, or transferring the Project Area to public ownership.
- For an Avoided Conversion Project, the action is committing the Project Area to continued forest management and protection through recording a conservation

[3] Uniform Standards of Professional Appraisal Practice. http://www.uspap.org/2010USPAP/toc.htm. (Accessed October 1, 2010).

[4] Section 170 (f)(11)(E)(ii) of the Internal Revenue Code defines a qualified appraiser as
"an individual who -
(I) has earned an appraisal designation from a recognized professional appraiser organization or has otherwise met minimum education and experience requirements set forth in regulations prescribed by the Secretary,
(II) regularly performs appraisals for which the individual receives compensation, and
(III) meets such other requirements as may be prescribed by the Secretary in regulations or other guidance."

easement with a provision to maintain the Project Area in forest cover or transferring the Project Area to public ownership.

An Improved Forest Management project's offset project commencement date must be linked to a discrete, verifiable action that delineates a change in practice relative to the Forest Project's baseline. Any one of the following actions denotes an Improved Forest Management project's offset project commencement date:

- Recordation of a conservation easement on the Project Area. The date the easement was recorded is the Forest Project's offset project commencement date.
- Transferring of property ownership (to a public or private entity). The offset project commencement date is the date of property transfer.
- Submitting the offset project listing information specified in Section 9.1.1. Offset project commencement is the date of submittal of listing information, provided that the offset project completes verification within 30 months of being submitted. If the offset project does not meet this deadline, the listing information must be resubmitted under the latest version of the protocol.

Adequate documentation denoting the offset project commencement date must include where applicable, deeds of trust, title reports, conservation easement documentation, dated forest management plans, and/or other relevant contracts or agreements.

3.3 Project Crediting Period

The crediting period for offset projects using this protocol is 25 years. This means that after a successful initial verification, a Forest Project will be eligible to receive Offset Credits for GHG reductions and/or removals quantified using this protocol, and verified by ARB-approved verification bodies, for a period of 25 years following the offset project's commencement date. A project may be renewed for subsequent crediting periods, subject to approval at that time and use of the quantification methods in the most recent approved version of the Forest Offset Protocol at the time of renewal.

The baseline for any Forest Project under this version of the Forest Offset Protocol is valid for the duration of the Project Life following a successful initial verification where the offset project receives a Positive Verification Statement.

3.4 Project Life and Minimum Time Commitment

Project Life is defined as the period of time between offset project commencement and a period of 100 years following the issuance of any ARB or registry offset credit for GHG reductions or GHG removal enhancements achieved by the offset project. Forest Projects must continue to monitor, verify and report offset project data for a period of 100 years following any ARB or registry offset credit issuance. For example, if ARB or registry offset credits are issued to a Forest Project in year 25 following offset project commencement, monitoring and verification activities must be maintained until year 125.

There are three possible exceptions to this minimum time commitment:

1. A Forest Project automatically terminates if a Significant Disturbance occurs leading to an Unintentional Reversal that reduces the Forest Project's Standing Live Carbon Stocks below the Forest Project's baseline Standing Live Carbon Stocks. If this occurs, the requirements of section 95983(d) of the Regulation shall apply.

2. A Forest Project automatically terminates if Project Lands or timber rights are sold to an entity that does not elect to take over the Forest Project responsibilities and commitments. Such a termination will require a quantity of ARB Offset Credits to be retired, as specified under 'Retiring Compliance Instruments Following Project Termination,' below.
3. A Forest Project may be voluntarily terminated prior to the end of its minimum time commitment if the required quantities of Compliance Instruments are retired, as specified under 'Retiring Compliance Instruments Following Project Termination,' below.

Retiring Compliance Instruments Following Project Termination

If a Forest Project is terminated for any reason except an unintentional reversal, the Forest Owner must replace any ARB Offset Credits that have previously been issued based on the requirements in the Regulation and the following provisions:

a. For a Reforestation or Avoided Conversion Project, a quantity of Compliance Instruments equal to the total number of ARB Offset Credits issued, and where applicable, all Early Action Offset Credits issued pursuant to section 95990(i) of the Regulation, to the project over the preceding 100 years must be retired.
b. For an Improved Forest Management Project, a quantity of Compliance Instruments equal to the total number of ARB Offset Credits issued, and where applicable, all Early Action Offset Credits issued pursuant to section 95990(i) of the Regulation, to the project over the preceding 100 years, multiplied by the appropriate compensation rate indicated in Table 3.1 must be retired.

Table 3.1. Compensation Rate for Terminated Improved Forest Management Projects

Number of years that have elapsed between offset project commencement and the date of termination	Compensation Rate
0-5	1.40
6-10	1.20
11-20	1.15
21-25	1.10
31-50	1.05
>50	1.00

3.5 Use of Qualified Conservation Easements

For Avoided Conversion Projects on private land, the Forest Owner must record a Qualified Conservation Easement against the offset project's property in order for the Forest Project to be eligible. Any Forest Project that records a Qualified Conservation Easement may reduce its risk rating and required contribution to the Forest Buffer Account in Appendix D. To be "qualified" for purposes of ARB's compliance offset program, the conservation easement must:

a. Be granted by the owner of the fee to a qualified holder of a conservation easement in accordance with the conservation easement enabling statute of the state in which the project is located;
b. Be perpetual in duration;

c. Expressly acknowledge that ARB is a third party beneficiary of the conservation easement with the right to enforce all obligations under the easement and all other rights and remedies conveyed to the holder of the easement. These rights include standing as an interested party in any proceeding affecting the easement.

Qualified Conservation Easements must be recorded no earlier than one year before the offset project's commencement date. If a Qualified Conservation Easement was recorded more than one year prior to the offset project commencement date, the limits imposed by the easement on forest management activities must be considered a legal mandate for the purpose of satisfying the legal requirement test for additionality (Section 3.1.1) and in determining the Forest Project's baseline (Section 0).

As indicated in Section 3.2, an offset project commencement date must be linked to a discrete, verifiable action. The recordation of a conservation easement may be used to denote the commencement date of pre-existing projects between December 31, 2006 and December 31, 2010. Any previously recorded conservation easement may only be considered a Qualified Conservation Easement if it was recorded within one year prior to the identified project commencement date. Any previously recorded conservation easement must still meet, or be modified to meet, all of the requirements of this section (i.e. expressly acknowledging ARB as a third-party beneficiary) in order to be considered "qualified."

The conservation easement may be amended to exclude ARB as a third party beneficiary upon termination of the Forest Project or once all legal requirements for monitoring and verification of carbon stocks under this Compliance Offset Protocol have been met.

3.6 Project Location

All Forest Projects must be located in the United States of America. Reforestation Projects and Improved Forest Management Projects may be located on private land, or on state or municipal public land. Avoided Conversion Projects must be implemented on private land, unless the land is transferred to public ownership as part of the project.

All Forest Projects on public lands must be approved by the government agency or agencies responsible for management activities on the land. This approval must include an explicit approval of the Forest Project's baseline, as determined in Section 0, and must involve any public vetting processes necessary to evaluate management and policy decisions concerning the project activity. Offset projects on federal lands that are not included in the categories of land in the following paragraph are not eligible at this time.

Forest Projects situated on the following categories of land are only eligible under this protocol if they meet the requirements of this protocol and the Regulation, including the waiver of sovereign immunity requirements of section 95975(l) in the Regulation:

1. Land that is owned by, or subject to an ownership or possessory interest of a Tribe;
2. Land that is "Indian lands" of a Tribe, as defined by 25 U.S.C. §81(a)(1); or
3. Land that is owned by any person, entity, or Tribe, within the external borders of such Indian lands.

The Forest Offset Protocol contains data tables, equations, and benchmark data applicable to projects located in the United States. The methods required by this protocol for estimating baseline carbon stocks for Forest Projects cannot currently be applied outside the United

States, as they rely on U.S.-specific data sets and models. Forest Projects in Alaska and Hawaii are not eligible at this time due to lack of region-specific data.

3.7 Regulatory Compliance

As stated in the Regulation, Project Lands must fulfill all applicable local, regional and national requirements on environment impact assessments that apply based on the offset project location. Offset projects must also meet any other local, regional, and national requirements that might apply.

Each time the Forest Project is verified, the Offset Project Operator or Authorized Project Designee must attest that the Forest Owner and Project Lands are in compliance with all applicable laws and regulations. The Offset Project Operator or Authorized Project Designee are required to disclose in writing to the verifier any and all instances of non-compliance associated with the Project Lands with any legal requirement. If a verifier finds that an offset project is in a state of non-compliance with any environmental law or regulation, then ARB or registry offset credits will not be issued for GHG reductions or GHG removal enhancements that occurred during any reporting period of non-compliance.

3.8 Sustainable Harvesting and Natural Forest Management Practices

Forest Projects can create long-term climate benefits as well as provide other environmental benefits, including the sustaining of natural ecosystem processes. This protocol requires eligible offset projects to employ both sustainable long-term harvesting practices and Natural Forest Management practices over time, as described below. Any non-conformance with the sustainable harvesting and Natural Forest Management requirements in this section will result in an adverse offset verification statement during the reporting periods that the Forest Project was out of conformance.

3.8.1 Sustainable Harvesting Practices

At the time commercial harvesting is either planned or initiated within the Project Area, the Offset Project Operator or Authorized Project Designee must demonstrate that the Forest Owner(s) employs and demonstrates sustainable long-term harvesting practices on all of its forest landholdings, including the Project Area, using one of the following options:

1. The Forest Owner must be certified under the Forest Stewardship Council, Sustainable Forestry Initiative, or Tree Farm System certification programs. Regardless of the program, the terms of certification must require adherence to and verification of harvest levels which can be permanently sustained over time.
2. The Forest Owner must adhere to a renewable long-term management plan that demonstrates harvest levels which can be permanently sustained over time and that is sanctioned and monitored by a state or federal agency.
3. The Forest Owner must employ uneven-aged silvicultural practices (if harvesting occurs) and must maintain canopy cover averaging at least 40 percent across the entire forestland owned by the Forest Owner in the same Assessment Areas covered by the Project Area, as measured on any 20 acres within the Forest Owner's landholdings found in any of these Assessment Areas, including land within and outside of the Project Area (areas impacted by Significant Disturbance may be excluded from this test).

Forest Owners who acquire new forest landholdings within their entity have up to 5 years to incorporate such acquisitions under their certification or management plan, whether or not such land is contiguous with the Project Area.

3.8.2 Natural Forest Management

All Forest Projects must promote and maintain a diversity of native species and utilize management practices that promote and maintain native forests comprised of multiple ages and mixed native species within the Project Area and at multiple landscape scales ("Natural Forest Management").

All Forest Projects are required to establish and/or maintain forest types that are native to the Project Area. For the purposes of this protocol, native forests are defined as those forests occurring naturally in an area, as neither a direct nor indirect consequence of human activity post-dating European settlement.

The Forest Offset Protocol Resources section of ARB's webpage provides required references by Assessment Area for the definition of native forests (see Appendix F). If a state/regional reference is unavailable or inadequate, documentation from a state botanist or other qualified independent resource, recognized as expert by academic, private and government organizations, must be submitted indicating that the project promotes and maintains native forests per the definition above. Where supported by scientific peer-reviewed research, the planting of native species outside of their current distribution is allowed as an adaptation strategy due to climate change. Such planting must be done in accordance with a state or federally approved adaptation plan, or a local plan that has gone through a transparent public review process. A written statement must be submitted from the government agency in charge of forestry regulation in the state where the project is located stipulating that the planting of native trees outside their current range is appropriate as an adaptation to climate change.

The following requirements shall apply to all Forest Projects regardless of the silvicultural or regeneration methods that are used to manage or maintain the forest:

1. Forest Projects must maintain or increase standing live carbon stocks over the project life, as described in Section 3.8.3.
2. Forest Projects must show verified progress (verified at scheduled site-visits) towards native tree species composition and distribution consistent with the forest type and forest soils native to the Assessment Area.
3. Forest Projects must manage the distribution of habitat/age classes and structural elements to support functional habitat for locally native plant and wildlife species naturally occurring in the Project Area, as specified in Table 3.2 and Section 3.8.4 below.

Forest Projects that initially engage in Natural Forest Management must continue to do so for as long as monitoring and verification of the Forest Project are required by this protocol (i.e. for the duration of the Project Life). Forest Projects that do not initially meet Natural Forest Management criteria but can demonstrate progress towards meeting these criteria at the times identified in Table 3.2 are still eligible.

The evaluation criteria provided in Table 3.2 shall be used to determine if the Forest Project meets the criteria for engaging in Natural Forest Management. The following evaluation must be completed and verified at a Forest Project's first verification and at all subsequent verifications. Forest Project carbon stock inventories (requirements for which are contained in Appendix A) should be used as the basis of these assessments where applicable.

Table 3.2. Evaluation criteria to test if a Forest Project meets the requirement for the establishment and maintenance of native species and natural forest management

Criteria	When Assessed	Results of not passing criteria	Application Rules
Native Species			
Project consists of at least 95% native species based on the sum of carbon in the standing live carbon pool. The assessment shall be conducted using estimates of stems per acre for Reforestation Projects and basal area per acre for Improved Forest Management and Avoided Conversion Projects.	Assessed at initial verification from inventory data.	Forest Project is not eligible unless demonstrated that management will achieve this goal over the project life.	Applies to all project types throughout the project life
	Assessment during verification site visits must demonstrate continuous progress toward goal. This criterion must be met within 25 years.	Project is not in conformance with protocol requirements.	
Composition of Native Species			
Improved Forest Management and Avoided Conversion Projects Where the Project Area naturally consists of a mixed species distribution, no single species' prevalence, measured as the percent of the basal area of all live trees in the Project Area, exceeds the percentage value of standing live carbon shown under the heading 'Species Diversity Index' (incorporated by reference, October 10, 2010) in the Forest Offset Protocol Resources section of ARB's website. Where the Project Area does not naturally consist of a mixed species distribution, a written statement from the government agency in charge of forestry regulation in the state where the project is located stipulating that the project area does not naturally consist of a mixed species distribution must be submitted. **Reforestation** To the extent seed is available, and/or physical site characteristics permit, Reforestation Projects that involve planting of seedlings must plant a mixture of species such that no single species' prevalence, measured as the percent of all live tree stems in the Project Area, exceeds the percentage value shown under the heading 'Species Diversity Index' (incorporated by reference, October 10, 2010) in the Assessment Area table in the Forest Offset Protocol Resources section of ARB's website. Where seed is unavailable, the Reforestation Project is based on natural regeneration, or physical site characteristics are limiting, a written statement from the government agency in charge of forestry regulation in the state where the project is located stipulating that seed is unavailable, the Reforestation Project is based on natural regeneration, or physical site characteristics are limiting must be submitted.	Species composition is assessed at project initiation from inventory data.	Project is not eligible, unless it is demonstrated that management activities will enable this goal to be achieved over the project life.	Applies to all project types throughout the project life Some project sites may not be capable of meeting the requirement. In these cases, a written statement from the government agency in charge of forestry regulation in the state where the project is located must be submitted as described under "Criteria"
	Species composition is assessed at initial verification from inventory data. Project must show continuous progress toward criteria. These criteria must be met within 25 years.	Project is not in conformance with protocol requirements.	
Distribution of Age Classes/Sustainable Management			
All forest landholdings owned or controlled by the Forest Owner are currently under one of the following: 1. Third party certification under the Forest Stewardship Council, Sustainable Forestry Initiative, or Tree Farm System, whose certification standards require adherence to and verification of harvest levels which can be permanently sustained	Condition shall be met at all times during project and is assessed during each verification.	Project is not in conformance with protocol requirements.	Applies to all project types at first regeneration harvest

over time, or 2. Operating under a renewable long-term management plan that demonstrates harvest levels which can be permanently sustained over time and that is sanctioned and monitored by a state or federal agency, or 3. The Forest Owner must employ uneven-aged silvicultural practices and canopy retention averaging at least 40 percent across the forest, as measured on any 20 acres within the entire forestland owned by the Forest Owner, including land within and outside of the Project Area. (Areas impacted by Significant Disturbance may be excluded from this test.)			
On a watershed scale up to 10,000 acres (or the project area, whichever is smaller), all projects must maintain, or make progress toward maintaining, no more than 40 percent of their forested acres in ages less than 20 years. (Areas impacted by Significant Disturbance may be excluded from this test.)	Age classes (if even age management is used) are assessed at project initiation and each verification site visit.	NA	
	Project must show continuous progress toward criteria. This criterion must be met within 25 years.	Project is not in conformance with protocol requirements.	
Structural Elements (Standing and Lying Dead Wood)			
Lying dead wood must be retained in sufficient quantities, as described below. **For portions of the Project Area that have not recently undergone salvage harvesting:** If a verifier determines that the quantity of lying dead wood is commensurate with recruitment from standing dead trees (i.e. there is no evidence that lying dead wood has been actively removed), the project must maintain (or demonstrate ongoing progress toward) an average of at least: ▪ one (1) metric ton of carbon (C) per acre; or ▪ 1% of standing live carbon stocks, in *standing* dead wood, whichever is higher, If a verifier determines that the quantity of lying dead wood is **not** commensurate with recruitment from standing dead trees (i.e. it appears lying dead wood has been actively removed), the project must maintain (or demonstrate ongoing progress toward) an average of at least: ▪ two (2) metric tons of carbon (C) per acre; or ▪ 1% of standing live carbon stocks, in *standing* dead wood, whichever is higher, Standing dead wood may be evenly or unevenly distributed throughout the portion of the Project Area unaffected by salvage harvesting, as long as the appropriate minimum average tonnage per acre requirement is met. **For portions of the Project Area that have undergone salvage harvesting within the previous year:*** If a verifier determines that the quantity of lying dead wood following salvage harvest is commensurate with recruitment from standing dead trees, the project must maintain (or demonstrate	Assessed during project at each verification audit.	Project is not in conformance with protocol requirements.	Applies to all project types throughout the project life

ongoing progress toward) an average of at least two (2) metric tons of carbon (C) per acre in *standing* dead wood, If a verifier determines that the quantity of lying dead wood following harvest is **not** commensurate with recruitment from standing dead trees, the project must maintain (or demonstrate ongoing progress toward) an average of at least four (4) metric tons of carbon (C) per acre in *standing* dead wood, Standing dead wood may be evenly or unevenly distributed throughout the portion of the Project Area subject to salvage harvesting, as long as the appropriate minimum average tonnage per acre requirement is met. This requirement must be met for a period of 30 years following the salvage harvest. After 30 years, the portion of the Project Area subject to salvage harvesting must meet the requirements for portions that have not recently undergone salvage harvesting (described above).			

3.8.3 Promotion of the Onsite Standing Live Carbon Stocks

In an effort to promote and maintain the environmental benefits of Forest Projects, the standing live carbon stocks within the Project Area must be maintained and/or increased during the Project Life. Therefore, except as specified below, ARB or registry offset credits will not be issued for quantified GHG reductions and GHG removal enhancements achieved by a Forest Project if a Forest Project's Offset Project Data Reports – over any 10-year consecutive period – indicate a decrease in the standing live carbon stocks.

Exceptions are allowed where reductions in standing live carbon stocks are important for maintaining and enhancing forest health, environmental co-benefits, or the long-term security of all carbon stocks; where reductions are due to non-harvest disturbances; or where reductions are required by law. Note that these exceptions in no way change or affect the requirements related to compensating for reversals, as detailed in Section 7.3.

Forest Projects whose standing live carbon stocks have decreased over a 10-year period are not in conformance with protocol requirements, except if the decrease in standing live carbon stocks is due to one of the following causes:

1. The decrease is demonstrably necessary to substantially improve the Project Area's resistance to wildfire, insect, or disease risks. The actions that will be taken to reduce the risks must be documented. The techniques used to improve resistance must be supported by relevant published peer reviewed research.
2. The decrease is associated with a planned balancing of age classes (regeneration, sub-merchantable, and merchantable) and is detailed in a long-term management plan that demonstrates harvest levels can be permanently sustained over time and that is sanctioned and monitored by a state or federal agency. In this case, documentation must be submitted at the time of the Forest Project's Listing, indicating that a balancing of age classes, resulting in a decrease in the standing live carbon stocks, is planned at the initiation of the Forest Project (Figure 3.1). At no time over the Project Life shall the Forest Project's inventory of standing live carbon stocks fall below the Forest Project's baseline standing live carbon stocks, or 20 percent less than the Forest Project's

standing live carbon stocks at the project's initiation, whichever is higher. Over any consecutive 10-year period, average standing live carbon stocks must be maintained at or above the standing live carbon stocks at the initiation of the project.

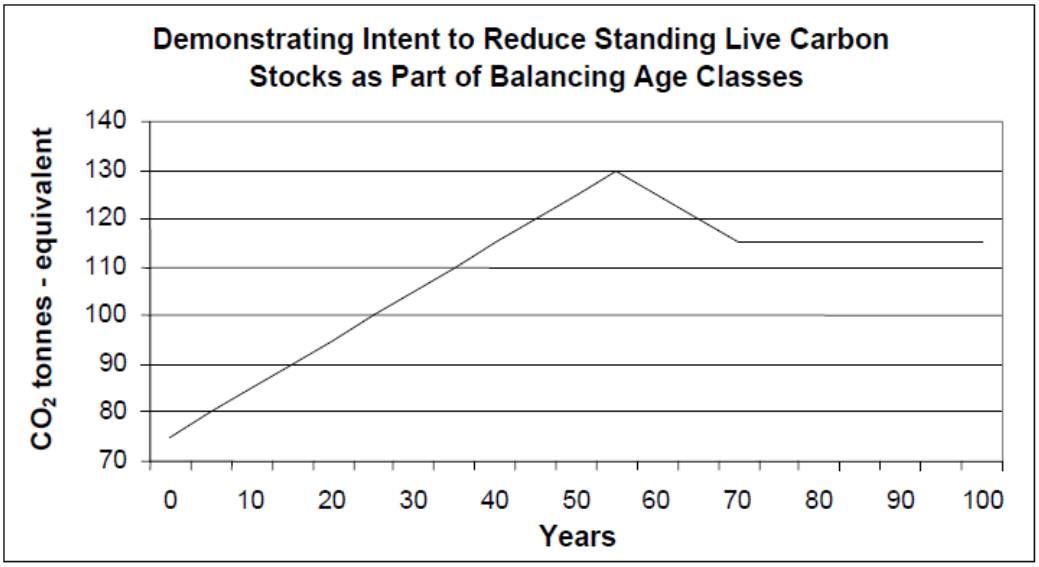


Figure 3.1. Example of Reducing Standing Live Carbon Stocks as Part of Balancing Age Classes

3. The decrease is part of normal silviculture cycles for forest ownerships less than 1,000 acres. Inventory fluctuations are a normal part of silvicultural activities. Periodic harvest may remove more biomass than the biomass growth over the past several years. At no time during the Project Life shall the Forest Project's inventory of standing live carbon stocks fall below the Forest Project's baseline standing live carbon stocks, or 20 percent less than the Forest Project's standing live carbon stocks at the project's initiation, whichever is higher. Over any consecutive 10-year period, average standing live carbon stocks must be maintained at or above the standing live carbon stocks at the initiation of the project. Documentation submitted at the time the Forest Project is Listed must indicate that fluctuations in the Forest Project's standing live carbon stocks are an anticipated silvicultural activity and that the overall trend will be for standing live carbon stocks to increase or stay the same over the life of the offset project (Figure 3.2).

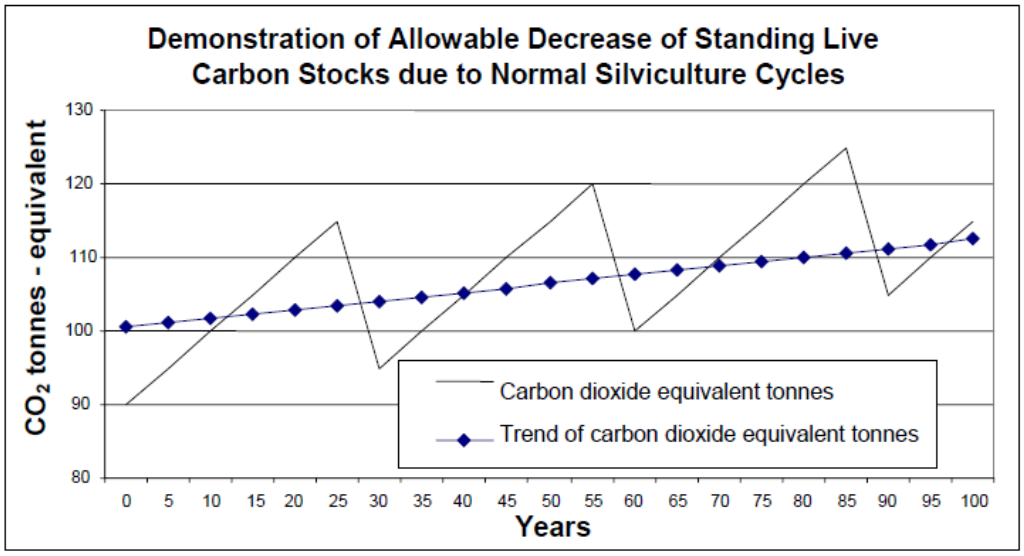


Figure 3.2. Example of Allowable Decrease of Standing Live Carbon Stocks due to Normal Silviculture Cycles

4. The decrease is due to an unintentional reversal such as wildfire, disease, flooding, wind-throw, insect infestation, or landslides.
5. The decrease in standing live carbon stocks occurs after the final crediting period (during the required 100 year monitoring period) as long as the residual live carbon stocks are maintained at a level that assures all credited standing live carbon stocks are permanently maintained.

3.8.4 Balancing Age and Habitat Classes

A variety of silvicultural practices may be employed in the Project Area during the course of a Forest Project though the protocol does not endorse any particular practice. To ensure environmental integrity, Forest Projects must meet a minimum set of standards in the use of any such practices.

For offset projects that employ even-aged management practices, harvesting must be limited to stands no greater than 40 acres. Stands adjacent to recently harvested stands must not be harvested using an even-aged harvest until the average age of the adjacent stand is at least 5-years old, or the average height in the adjacent stand is at least 5 feet. On a watershed scale up to 10,000 acres, all projects must maintain, or make progress toward maintaining, no more than 40 percent of their forested acres in ages less than 20 years. Areas impacted by a Significant Disturbance are exempt from this test until 20 years after reforestation of such areas.

The protocol does not override a landowner's obligation to abide by applicable laws and regulations, including any governing forest practice rules that may be more stringent. Regardless of the silvicultural practice employed, landowners must fulfill their commitment under the protocol to permanently maintain or increase onsite standing live carbon stocks (i.e. the carbon in live trees within the Project Area) as specified in Section 3.8.3.

4 Identifying the Project Area

The geographic boundaries defining the Project Area must be described in detail at the time a Forest Project is Listed. The boundaries must be defined using a map, or maps, that display public and private roads, major watercourses (4th order or greater), topography, towns, and either public land survey townships, ranges, and sections or latitude and longitude. The maps must be of adequate resolution to clearly identify the required features. The Project Area can be contiguous or separated into tracts. The Project Area may also extend across multiple Assessment Areas within an Ecosection or Supersection (see Appendix F) and across no more than two adjacent Ecosections or Supersections.

For Improved Forest Management Projects, the geographic boundaries may be defined such that non-forested areas, or areas not under forest management, are excluded from the Project Area.

For Reforestation Projects, the Project Area must be on land that has had less than 10 percent tree canopy cover for a minimum of ten years, or that have been subject to a Significant Disturbance that resulted in at least 20 percent of the carbon stocks being emitted. A Reforestation Project may defer finalizing the boundaries of the Project Area until the second full verification provided: (1) all lands included in the Project Area were initially included in the Project Area during listing, and (2) the Reforestation Project has elected to defer its initial inventory until the second full verification. This allows Reforestation Projects to initially identify a larger Project Area during project listing that may be revised prior to the completion of the forest inventory and the issuance of any ARB or registry offset credits.

For Avoided Conversion Projects, the Project Area is defined through the required appraisal process. The Project Area must be determined following the boundary definitions in Table 4.1 based on the type of anticipated conversion. All lands in the Project Area must be covered by the Qualified Conservation Easement or transferred to public ownership as part of the program.

Table 4.1. Project Area Definition for Avoided Conversion Projects

Conversion Type	Project Area Definition
Residential	The boundary of the parcel or parcels that have been appraised as having a 'higher and better use' in residential development.
Agricultural Conversion or Mining	The boundary of the parcel or parcels that have been appraised as having a 'higher and better use' in agricultural production or mining.
Golf Course	The boundary of the parcel or parcels that have been appraised as having a 'higher and better use' as a golf course. This is to include forested areas within 200' of fairways, greens, and buildings.
Commercial Buildings	The boundary of the parcel or parcels that have been appraised as having a 'higher and better use' in commercial buildings. This is to include forested areas with 200' of suitable building sites.

5 Offset Project Boundary

The Offset Project Boundary defines all the GHG emission sources, GHG sinks, and GHG reservoirs (SSR's) that must be accounted for in quantifying a Forest Project's GHG reductions and GHG removal enhancements (Section 0). The Offset Project Boundary encompasses all the GHG emission SSR's that may be significantly affected by Forest Project activities, such as forest carbon stocks and harvested wood products. For accounting purposes, the GHG sources, GHG sinks, and GHG reservoirs included in the Offset Project Boundary are organized according to whether they are predominantly associated with a Forest Project's "Primary Effect" (i.e. the Forest Project's intended changes in carbon stocks, GHG emissions, or GHG removal enhancements) or its "Secondary Effects" (i.e. unintended changes in carbon stocks, GHG emissions, or GHG removal enhancements caused by the Forest Project). Secondary effects may include increases in mobile combustion CO_2 emissions associated with site preparation, as well as increased CO_2 emissions caused by the shifting of harvesting activities from the Project Area to other forestlands (referred to as "Leakage"). Offset projects are required to account for Secondary Effects following the methods described in Section 6.

The following tables provide a comprehensive list of the SSRs that may be affected by a Forest Project, and indicate which SSRs must be included in the Offset Project Boundary for each type of Forest Project. If a SSR is designated as a "reservoir/pool," this means that GHG reductions and GHG removal enhancements are accounted for by quantifying changes in carbon stock levels. For SSRs designated as GHG sources or GHG sinks, GHG reductions and GHG removal enhancements are accounted for by quantifying changes in GHG emission or GHG removal enhancement rates, as described in the tables.

5.1 Reforestation Projects

Table 5.1. Offset Project Boundary – Reforestation Projects

SSR	Description	Type	Gas	Included or Excluded?	Quantification Method
Primary Effect Sources, Sinks, and Reservoirs					
RF-1	Standing live carbon (carbon in all portions of living trees)	Reservoir / Pool	CO_2	Included	**Baseline:** Modeled based on initial field inventory measurements **Project:** Measured by field measurements and updating forest carbon inventory
RF-2	Shrubs and herbaceous understory carbon	Reservoir / Pool	CO_2	Included	**Baseline:** Modeled based on initial field inventory measurements **Project:** Measured by updating forest carbon inventory
RF-3	Standing dead carbon (carbon in all portions of dead, standing trees)	Reservoir / Pool	CO_2	Included	**Baseline:** Modeled based on initial field inventory measurements **Project:** Measured by updating forest carbon inventory
RF-4	Lying dead wood carbon	Reservoir / Pool	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
RF-5	Litter and duff carbon (carbon in	Reservoir / Pool	CO_2	Excluded	**Baseline:** N/A

SSR	Description	Type	Gas	Included or Excluded?	Quantification Method
	dead plant material)				**Project:** N/A
RF-6	Soil carbon	Reservoir / Pool	CO_2	*Included/excluded: Soil carbon must be included in the Offset Project Boundary if any of the following occur: ▪ Site preparation activities involve deep ripping, furrowing, or plowing where soil disturbance exceeds (or is expected to exceed from the baseline characterization and modeling) 25 percent of the Project Area over the Project Life, or ▪ Mechanical site preparation activities are not conducted on contours.	**Baseline:** Modeled based on initial field inventory measurements **Project:** Measured by updating forest carbon inventory
RF-7	Carbon in in-use forest products	Reservoir / Pool	CO_2	Included	**Baseline:** Estimated from modeled harvesting volumes **Project:** Estimated from measured harvesting volumes
RF-8	Forest product carbon in landfills	Reservoir / Pool	CO_2	Excluded when project harvesting exceeds baseline Included when project harvesting is below baseline	**Baseline:** Estimated from modeled harvesting volumes **Project:** Estimated from measured harvesting volumes
Secondary Effect Sources, Sinks, and Reservoirs					
RF-9	Biological emissions from site preparation activities	Source	CO_2	*Included: Biological emissions from site preparation are not quantified separately, but rather are captured by measuring changes in included carbon reservoirs	**Baseline:** N/A **Project:** Quantified based on measured carbon stock changes in included reservoirs (SSRs #RF-2 and #RF-6)
RF-10	Mobile combustion emissions from site preparation activities	Source	CO_2	Included	**Baseline:** N/A **Project:** Estimated using default emission factors
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
RF-11	Mobile combustion emissions from ongoing project operation & maintenance	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
RF-12	Stationary combustion emissions from	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A

SSR	Description	Type	Gas	Included or Excluded?	Quantification Method
	ongoing project operation & maintenance				
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
RF-13	Biological emissions from clearing of forestland outside the Project Area	Source	CO_2	Included	**Baseline:** N/A **Project:** Estimated using default land-use conversion factors for non-project land
RF-14	Biological emissions/ removals from changes in harvesting on forestland outside the Project Area	Source / Sink	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
RF-15	Combustion emissions from production, transportation, and disposal of forest products	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A -
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
RF-16	Combustion emissions from production, transportation, and disposal of alternative materials to forest products	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
RF-17	Biological emissions from decomposition of forest products	Source	CO_2	Included	**Baseline:** Quantified as a component of calculating carbon stored for 100 years in wood products (SSR #RF-7) and landfills (SSR #RF-8) **Project:** Quantified as a component of calculating carbon stored for 100 years in wood products (SSR #RF-7) and landfills (SSR #RF-8)
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A

5.2 Improved Forest Management Projects

Table 5.2. Offset Project Boundary – Improved Forest Management Projects

SSR	Description	Type*	Gas	Included or Excluded?	Quantification Method
Primary Effect Sources, Sinks, and Reservoirs					
IFM-1	Standing live carbon (carbon in all portions of living trees)	Reservoir / Pool	CO_2	Included	**Baseline:** Modeled based on initial field inventory measurements **Project:** Measured by field measurements and updating forest carbon inventory
IFM-2	Shrubs and herbaceous understory carbon	Reservoir / Pool	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
IFM-3	Standing dead carbon (carbon in all portions of dead, standing trees)	Reservoir / Pool	CO_2	Included	**Baseline:** Modeled based on initial field inventory measurements **Project:** Measured by updating forest carbon inventory
IFM-4	Lying dead wood carbon	Reservoir / Pool	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
IFM-5	Litter and duff carbon (carbon in dead plant material)	Reservoir / Pool	CO_2	Excluded	**Baseline:** Modeled based on initial field inventory measurements **Project:** Measured by updating forest carbon inventory
IFM-6	Soil carbon	Reservoir / Pool	CO_2	*Included/ Excluded Soil carbon must be included in the Offset Project Boundary, if any of the following activities occur: ▪ Site preparation activities involve deep ripping, furrowing, or plowing where soil disturbance exceeds (or is expected to exceed from the baseline characterization and modeling) 25 percent of the Project Area over the Project Life, or ▪ Mechanical site preparation activities are not conducted on contours.	**Baseline:** Modeled based on initial field inventory measurements **Project:** Measured by updating forest carbon inventory
IFM-7	Carbon in in-use forest products	Reservoir / Pool	CO_2	Included	**Baseline:** Estimated from modeled harvesting volumes **Project:** Estimated from measured harvesting volumes
IFM-8	Forest product carbon in landfills	Reservoir / Pool	CO_2	Excluded when project harvesting exceeds baseline Included when project harvesting is below baseline	**Baseline:** Estimated from modeled harvesting volumes **Project:** Estimated from measured harvesting volumes
Secondary Effect Sources, Sinks, and Reservoirs					
IFM-9	Biological	Source	CO_2	*Included	**Baseline:** N/A

SSR	Description	Type*	Gas	Included or Excluded?	Quantification Method
	emissions from site preparation activities			Biological emissions from site preparation are not quantified separately, but rather are captured by measuring changes in included carbon reservoirs	**Project:** Quantified based on measured carbon stock changes in included reservoirs (SSR #IFM-6, where applicable)
IFM-10	Mobile combustion emissions from site preparation activities	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
IFM-11	Mobile combustion emissions from ongoing project operation & maintenance	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A .
IFM-12	Stationary combustion emissions from ongoing project operation & maintenance	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
IFM-13	Biological emissions from clearing of forestland outside the Project Area	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
IFM-14	Biological emissions/ removals from changes in harvesting on forestland outside the Project Area	Source / Sink	CO_2	Included / Excluded	**Baseline:** N/A **Project:** Estimated using a default 20% “leakage” factor applied to the difference in harvest volume relative to baseline
IFM-15	Combustion emissions from production, transportation, and disposal of forest products	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A

SSR	Description	Type*	Gas	Included or Excluded?	Quantification Method
IFM-16	Combustion emissions from production, transportation, and disposal of alternative materials to forest products	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
IFM-17	Biological emissions from decomposition of forest products	Source	CO_2	*Included	**Baseline:** Quantified as a component of calculating carbon stored for 100 years in wood products (SSR #IFM-7) and landfills (SSR #IFM-8) **Project:** Quantified as a component of calculating carbon stored for 100 years in wood products (SSR #IFM-7) and landfills (SSR #IFM-8)
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A

5.3 Avoided Conversion Projects

Table 5.3. Offset Project Boundary – Avoided Conversion Projects

SSR	Description	Type*	Gas	Included or Excluded?	Quantification Method
Primary Effect Sources, Sinks, and Reservoirs					
AC-1	Standing live carbon (carbon in all portions of living trees)	Reservoir / Pool	CO_2	Included	**Baseline:** Modeled based on initial field inventory measurements and expected land-use conversion rates **Project:** Measured by field measurements and updating forest carbon inventory
AC-2	Shrubs and herbaceous understory carbon	Reservoir / Pool	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
AC-3	Standing dead carbon (carbon in all portions of dead, standing trees)	Reservoir / Pool	CO_2	Included	**Baseline:** Modeled based on initial field inventory measurements and expected land-use conversion rates **Project:** Measured by updating forest carbon inventory
AC-4	Lying dead wood carbon	Reservoir / Pool	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
AC-5	Litter and duff carbon (carbon	Reservoir / Pool	CO_2	Excluded	**Baseline:** N/A

SSR	Description	Type*	Gas	Included or Excluded?	Quantification Method
	in dead plant material)				**Project:** N/A
AC-6	Soil carbon	Reservoir / Pool	CO_2	*Included/ Excluded Soil carbon must be included in the Offset Project Boundary, if any of the following activities occur: ▪ Site preparation activities involve deep ripping, furrowing, or plowing where soil disturbance exceeds (or is expected to exceed from the baseline characterization and modeling) 25 percent of the Project Area over the Project Life, or ▪ Mechanical site preparation activities are not conducted on contours	**Baseline:** Modeled based on initial field inventory measurements and expected land-use conversion rates **Project:** Measured by updating forest carbon inventory
AC-7	Carbon in in-use forest products	Reservoir / Pool	CO_2	Included	**Baseline:** Estimated from modeled harvesting volumes **Project:** Estimated from measured harvesting volumes
AC-8	Forest product carbon in landfills	Reservoir / Pool	CO_2	Excluded when project harvesting exceeds baseline Included when project harvesting is below baseline	**Baseline:** Estimated from modeled harvesting volumes **Project:** Estimated from measured harvesting volumes
Secondary Effect Sources, Sinks, and Reservoirs					
AC-9	Biological emissions from site preparation activities	Source	CO_2	*Included Biological emissions from site preparation are not quantified separately, but rather are captured by measuring changes in included carbon reservoirs	**Baseline:** N/A **Project:** Quantified based on measured carbon stock changes in included reservoirs (SSR #AC-6, where applicable)
AC-10	Mobile combustion emissions from site preparation activities	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
AC-11	Mobile combustion emissions from ongoing project operation & maintenance	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
AC-12	Stationary combustion	Source	CO_2	Excluded	**Baseline:** N/A

SSR	Description	Type*	Gas	Included or Excluded?	Quantification Method
	emissions from ongoing project operation & maintenance				**Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
AC-13	Biological emissions from clearing of forestland outside the Project Area	Source	CO_2	Included	**Baseline:** N/A **Project:** Estimated using default forestland conversion factors
AC-14	Biological emissions/ removals from changes in harvesting on forestland outside the Project Area	Source / Sink	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
AC-15	Combustion emissions from production, transportation, and disposal of forest products	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
AC-16	Combustion emissions from production, transportation, and disposal of alternative materials to forest products	Source	CO_2	Excluded	**Baseline:** N/A **Project:** N/A
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A
AC-17	Biological emissions from decomposition of forest products	Source	CO_2	Included	**Baseline:** Quantified as a component of calculating carbon stored for 100 years in wood products (SSR #AC-7) and landfills (SSR #AC-8) **Project:** Quantified as a component of calculating carbon stored for 100 years in wood products (SSR #AC-7) and landfills (SSR #AC-8)
			CH_4	Excluded	**Baseline:** N/A **Project:** N/A
			N_2O	Excluded	**Baseline:** N/A **Project:** N/A Decomposition of forest is not expected to be a significant source of N_2O emissions.

6 Quantifying Net GHG Reductions and GHG Removal Enhancements

This section provides requirements and methods for quantifying a Forest Project's net GHG reductions and GHG removal enhancements.

Quantification Methodology:
For each type of Forest Project, quantification proceeds in seven steps:

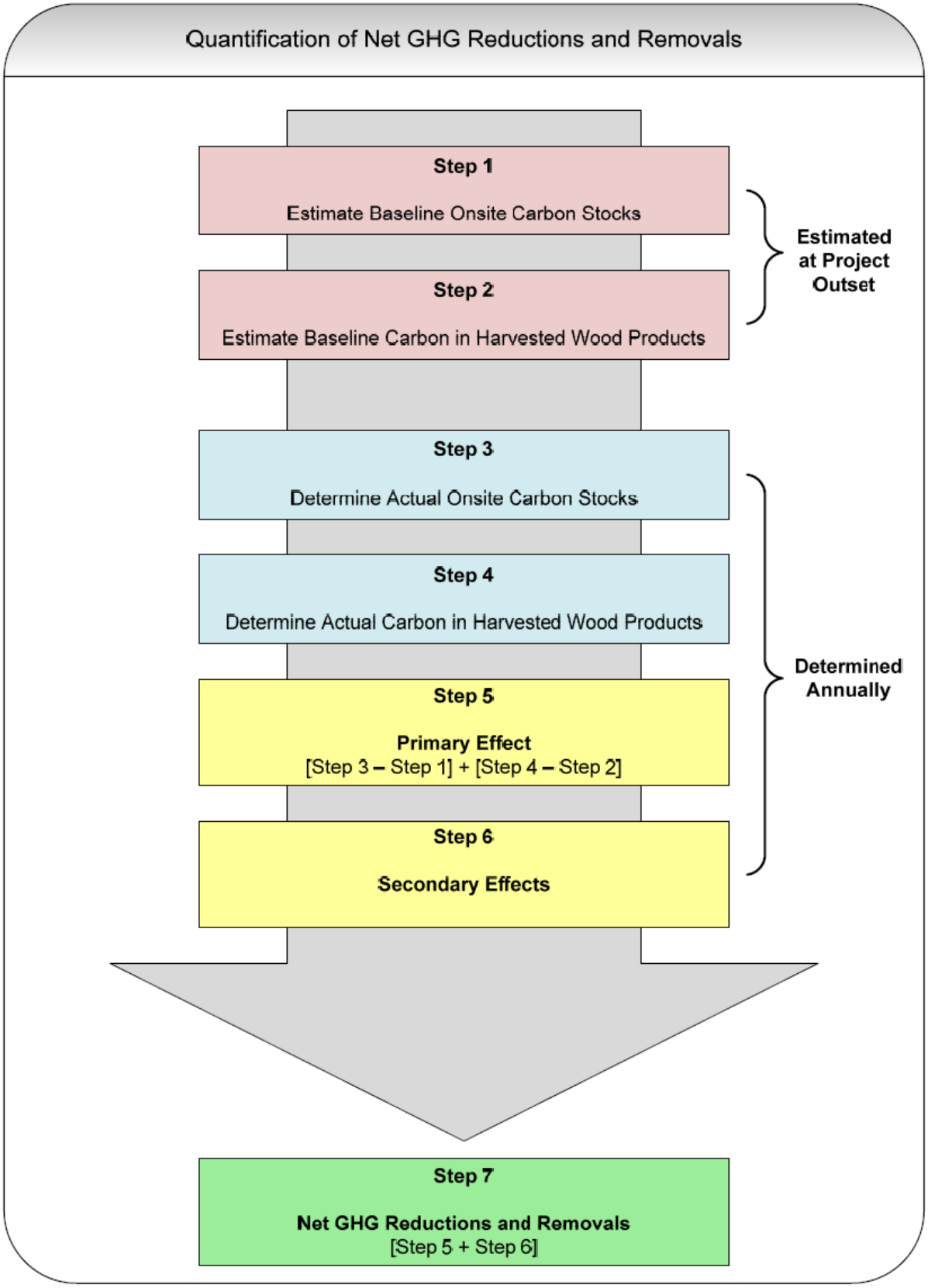
1. **Estimating baseline onsite carbon stocks.** The baseline is an estimate of what would have occurred in the absence of a Forest Project. To establish baseline onsite carbon stocks, the carbon stock changes in each of the Forest Project's required onsite carbon pools (identified in Sections 5.1 to 5.3) must be modeled over 100 years. Modeling must be based on inventoried carbon stocks at the time of the Forest Project's offset project commencement (or when first inventoried as is allowed for Reforestation Projects), following the applicable requirements in this section. Onsite carbon stocks are inventoried following the requirements in Appendix A; modeling of onsite carbon stocks over time must be conducted following the requirements in this section and the requirements and methods in Appendix B. Baseline onsite carbon stocks are estimated over 100 years at the time of the Forest Project's commencement.
2. **Estimating baseline carbon in harvested wood products.** In conjunction with modeling baseline onsite carbon stocks, a forecast of any harvesting that would have occurred in the baseline must be developed and converted to an average annual harvesting volume. From this, the amount of carbon that would have been transferred each year (on average) to long-term storage in wood products can be determined. Baseline harvesting is forecasted following the requirements in this section and carbon stored in wood products must be calculated following the requirements and methods in Appendix C.
3. **Determining actual onsite carbon stocks.** Each year, the Forest Project's actual onsite carbon stocks must be determined. This must be done by updating the Forest Project's forest carbon inventory for the current year, following the requirements and methods in this section and in Appendices A and B. The estimate of actual onsite carbon stocks must be adjusted by an appropriate confidence deduction, as described in Appendix A, Section A.4.
4. **Determining actual carbon in harvested wood products.** Each year, any harvesting in the Project Area must be reported and from this, the amount of carbon transferred to long-term storage in wood products must be calculated following the requirements and methods in Appendix C.
5. **Calculating the offset project's Primary Effect.** Each year, the actual change in GHG emissions or GHG removal enhancements associated with the Forest Project's intended ("Primary") effect must be quantified, as defined in Section 5. For any given year, the Primary Effect is calculated by:
    a. Taking the difference between actual onsite carbon stocks for the current year and actual onsite carbon stocks for the prior year
    b. Subtracting from (a) the difference between baseline onsite carbon stocks for the current year and baseline onsite carbon stocks for the prior year
    c. Adding to (b) the calculated difference between actual and baseline carbon in harvested wood products for the current year (see Equation 6.1.)
6. **Quantifying the offset project's Secondary Effects.** Each year, the actual change in GHG emissions or GHG removal enhancements associated with the Forest Project's unintended ("Secondary") effects must be quantified as defined in Section 5.

Requirements and methods for quantifying Secondary Effects are provided below for each type of Forest Project. Secondary Effects will almost always be negative (i.e. they will reflect an increase in GHG emissions caused by the offset project).

7. **Calculating total net GHG reductions and GHG removal enhancements.** For each year, total net GHG reductions and GHG removal enhancements are calculated by summing a Forest Project's Primary and Secondary Effects. If the result is positive, then the Forest Project has generated GHG reductions and/or GHG removal enhancements in the current year. If the result is negative, this indicates a reversal has occurred except as specified below (see Section 7).

Requirements for how to perform quantification steps 1 to 4 for each Forest Project type are presented in the remainder of this section. The required formula for quantifying annual net GHG reductions and GHG removal enhancements is presented in Equation 6.1. Net GHG reductions and GHG removal enhancements must be quantified and reported in units of carbon dioxide-equivalent (CO_2e) metric tons.

A reversal occurs only if: (1) total net GHG reductions and GHG removal enhancements for the year are negative; and (2) ARB or registry offset credits have previously been issued to the Forest Project. If calculated GHG reductions and GHG removal enhancements are negative and no ARB or registry offset credits have been issued to the project since its commencement date then the result should be treated as a "negative carryover" to GHG reduction calculations in subsequent years (variable N_{y-1} in Equation 6.1). This may happen, for example, because the confidence deduction applied to actual onsite carbon stocks can result in actual values being less than baseline values in a Forest Project's initial years.


Quantification of Net GHG Reductions and Removals
Step 1
Estimate Baseline Onsite Carbon Stocks
Step 2
Estimate Baseline Carbon in Harvested Wood Products
Estimated at Project Outset
Step 3
Determine Actual Onsite Carbon Stocks
Step 4
Determine Actual Carbon in Harvested Wood Products
Step 5
Primary Effect
[Step 3 – Step 1] + [Step 4 – Step 2]
Step 6
Secondary Effects
Determined Annually
Step 7
Net GHG Reductions and Removals
[Step 5 + Step 6]

Quantification Methodology

Equation 6.1.

$$QR_y = [(\Delta AC_{onsite} - \Delta BC_{onsite}) + (AC_{wp,\,y} - BC_{wp,\,y}) * 80\% + SE_y] * (1 - ACD) + N_{y-1}$$

Where,

QR_y	=	Quantified GHG reductions and GHG removal enhancements for year y
ΔAC_{onsite}	=	$(AC_{onsite,\,y})(1 - CD_y) - (AC_{onsite,\,y-1})(1 - CD_{y-1})$

Where,

$AC_{onsite,\,y}$ = Actual onsite carbon (CO_2e) as inventoried for year y

$AC_{onsite,\,y-1}$ = Actual onsite carbon (CO_2e) as inventoried for year y-1 (if y is the first year of the offset project, then the value for $AC_{onsite,\,y-1}$ will be zero)

CD_y = Appropriate confidence deduction for year y, as determined in Appendix A, Section A.4.

CD_{y-1} = Appropriate confidence deduction for year y-1, as determined in Appendix A, Section A.4.

ΔBC_{onsite}	=	$BC_{onsite,\,y} - BC_{onsite,\,y-1}$

Where,

$BC_{onsite,\,y}$ = Baseline onsite carbon (CO_2e) as estimated for year y

$BC_{onsite,\,y-1}$ = Baseline onsite carbon (CO_2e) as estimated for year y-1 (if y is the first year of the offset project, then the value for $BC_{onsite,\,y-1}$ will be zero) [5]

$AC_{wp,\,y}$	=	Actual carbon in wood products produced in year y that is projected to remain stored for at least 100 years (i.e. $WP_{total,\,y}$ derived for actual harvest volumes following the requirements and methods in Appendix C)
$BC_{wp,y}$	=	Averaged annual baseline carbon in wood products that would have remained stored for at least 100 years (i.e. $WP_{total,\,y}$ derived for baseline harvest volumes following the requirements and methods in Appendix C)
SE_y	=	Secondary Effect GHG emissions caused by the project activity in year y
ACD	=	Avoided Conversion Project discount factor, determined in Section 6.3.1
N_{y-1}	=	Any negative carryover from the prior year (occurs when total quantified GHG reductions are negative prior to the issuance of any CRTs for the project)

Note: The net change in carbon in harvested wood products, ($AC_{wp,\,y} - BC_{wp,\,y}$), is multiplied by 80 percent in Equation 6.1 to reflect market responses to changes in wood product production. The general assumption in this protocol is that for every ton of reduced harvesting caused by a

[5] For Improved Forest Management projects, where baseline onsite carbon stocks are averaged across all years, the value for ΔBC_{onsite} will be zero in all years except the first year of the project.

Forest Project, the market will compensate with an increase in harvesting of 0.2 tons on other lands (see Section 6.2.6).

6.1 Reforestation Projects

6.1.1 Estimating Baseline Onsite Carbon Stocks

Quantification Methodology

To estimate baseline carbon stocks for a Reforestation Project:

1. Provide a qualitative characterization of the likely vegetative conditions and activities that would have occurred without the project, taking into consideration any laws, statutes, regulations, or other legal mandates that would encourage or require reforestation on the Project Area. The qualitative assessment shall include an assessment of the commercial value of trees within the Project Area over the next 30 years. The qualitative assessment must be used as the basis for modeling baseline carbon stocks (Step 3).
2. Inventory the carbon stocks in each of the Forest Project's required carbon pools, following the requirements in Appendix A of this protocol.[6] For carbon pools that will be affected by site preparation, the inventory must be conducted prior to any site preparation activities. For those carbon pools that are affected by site preparation, provide an estimate of initial carbon stocks using one of the following alternatives:
    - Measuring carbon stocks using 20 sample plots located in the portion of the Project Area containing the greatest amount of biomass in the pool that will be affected.
    - Stratifying (classifying) the Project Area into similar densities and measuring stocks within the affected carbon pools using 20 sample plots per density class.
    - Measuring the affected carbon stocks based on a grid system across the Project Area.

For other carbon stocks, the inventory may be deferred, as described below.

3. Once a full inventory is obtained, perform a computer simulation that models the carbon stocks for 100 years following the forest project's commencement date, based on the qualitative characterization of what would have occurred without the offset project. The modeling must follow the requirements and methods for modeling contained in Appendix B, Section B.3, incorporating any conditions and constraints specified in the qualitative characterization of the baseline (Step 1, above). The computer simulation must model the expected growth in carbon stocks associated with pre-existing trees in the Project Area (i.e. those not planted as part of the Forest Project).

Deferral of Initial Inventory for Carbon Stocks Not Affected by Site Preparation

The inventory of carbon stocks that are not affected by site preparation may be deferred until a Reforestation Project's second verification. At the time of the second verification, an estimated inventory of the all required carbon stocks at the time of the Forest Project's offset project commencement date must prepared by:

1. Assuming standing dead carbon stocks at the time of the Forest Project's offset project commencement date were equal to the standing dead carbon stocks measured and verified at the second verification.

[6] Initial carbon stocks could be zero if the Project Area has no quantifiable forest cover or required carbon pools.

2. Using an approved growth model or a stand table projection methodology, as described in Appendix B, Section B.1, to derive an estimate of standing live carbon stocks in pre-existing trees (i.e. those not planted as part of the Forest Project) at the time of the Forest Project's offset project commencement date. The approved growth model or stand table projection used for the estimate must produce a result within 5 percent of current inventory data for pre-existing trees.

If the inventory of these carbon pools is deferred, the timing of the second verification is at the discretion of the Offset Project Operator or Authorized Project Designee (but must occur within 12 years of the initial verification). Reforestation Projects for which an initial inventory is deferred are not eligible to receive ARB or registry offset credits until after the second verification.

6.1.2 Estimating Baseline Carbon in Harvested Wood Products

Quantification Methodology

If harvesting of the pre-existing trees would be expected to occur in the baseline, the following steps must be performed:

1. Use a model (see Appendix B) to determine the *average* amount of carbon in standing live carbon stocks (prior to delivery to a mill) that would have been harvested in each year of the baseline over 100 years. The result will be a uniform estimate of harvested carbon in each year of the baseline. This estimate is determined at offset project commencement using the same biomass equations used to calculate biomass in live trees, and will not change over the course of the offset project crediting period.
2. On an annual basis, determine the amount of harvested carbon that would have remained stored in wood products, averaged over 100 years, following the requirements and methods in Appendix C.

6.1.3 Determining Actual Onsite Carbon Stocks

Quantification Methodology

Actual carbon stocks for Reforestation Projects must be determined by updating the Project Area's forest carbon inventory. This is done by:

1. Incorporating any new forest inventory data obtained during the previous year into the inventory estimate. Any plots sampled during the previous year must be incorporated into the inventory estimate.
2. Using an approved model to "grow" (project forward) prior-year data from existing forest inventory plots to the current reporting year. Approved growth models and requirements and methods for projecting forest inventory plot data using models is provided in Appendix B.
3. Updating the forest inventory estimate for harvests and/or disturbances that have occurred during the previous year.
4. Applying an appropriate confidence deduction for the inventory based on its statistical uncertainty, following the requirements and methods in Appendix A, Section A.4.

6.1.4 Determining Actual Carbon in Harvested Wood Products

Quantification Methodology

Perform the following steps to determine actual carbon in harvested wood products:

1. Determine the actual amount of carbon in standing live carbon stocks (prior to delivery to a mill) harvested in the current year (based on harvest volumes determined in Section 6.1.3).

2. Determine the amount of actual harvested carbon that will remain stored in wood products, averaged over 100 years, following the requirements and methods in Appendix C.

6.1.5 Quantifying Secondary Effects

Quantification Methodology

For Reforestation Projects, significant Secondary Effects can arise from two sources:

1. One-time combustion emissions associated with machinery used in site preparation; and
2. The shifting of cropland or grazing activities to forestland outside the Project Area (which may be both a market and/or physical response to the project activity), which is accounted for over the Project Life.

To quantify combustion emissions associated with site preparation, use the appropriate standard emission factor from Table 6.1 corresponding to the level of brush cover on the Project Area, multiplied by the number of acres in the Project Area (Equation 6.2).

Mobile combustion emissions must be added to Secondary Effect emissions (SE_y in Equation 6.1) in the first year of an offset project. If this results in a negative amount for total net quantified GHG reductions and GHG removal enhancements in year one (QR_1), the negative amount must be carried over into future years (N_{y-1} in Equation 6.1) until sufficient GHG reductions and GHG removal enhancements are accrued to achieve a positive balance. Negative GHG reductions and GHG removal enhancements due to site preparation emissions are *not* considered a reversal (Section 7.1).

Equation 6.2. Combustion Emissions Associated with Site Preparation

$$\mathbf{MC_y = (-1) \times (EF_{mc} \times PA)}$$

Where,

MC_y	=	Secondary Effect CO_2e emissions due to mobile combustion from site preparation
EF_{mc}	=	Mobile combustion emission factor from Table 6.1
PA	=	The size of the Project Area, in acres

Table 6.1. Mobile Combustion Emissions for Reforestation Projects

SITE PREP - REFORESTATION PROJECTS		
Emissions Associated with Mobile Combustion		
Average Metric Tons CO_2e Per Acre		
Light	Medium	Heavy
25% Brush Cover	50% Dense Brush Cover	> 50% Brush Cover, stump removal
0.090	**0.202**	**0.429**

To quantify GHG emissions from the shifting of cropland and grazing activities each year, determine the appropriate “leakage” risk percentage for the project following the decision tree in Figure 6.3. The leakage risk percentage is only determined once, at offset project

commencement. Each year, this percentage must be applied to the net increase in onsite carbon stocks to determine the annual Secondary Effects due to shifting of cropland or grazing activities (Equation 6.3).

Equation 6.3. Emissions from Shifting Cropland and Grazing Activities

$$\mathbf{AS_y = (-1) \times L \times (\Delta\, AC_{onsite} - \Delta\, BC_{onsite})}$$

Where,

AS_y	=	Secondary Effect CO_2e emissions due to shifting of cropland or grazing activities
L	=	Leakage risk percentage, as determined from Figure 6.3
$\Delta\, AC_{onsite}$	=	Annual difference in actual onsite carbon (CO_2e) as defined in Equation 6.1.
$\Delta\, BC_{onsite}$	=	Annual difference in baseline onsite carbon (CO_2e) as defined in Equation 6.1.

Total Secondary Effect emissions for Reforestation Projects are calculated as follows (Equation 6.4). The value for Secondary Effect emissions will always be negative or zero.

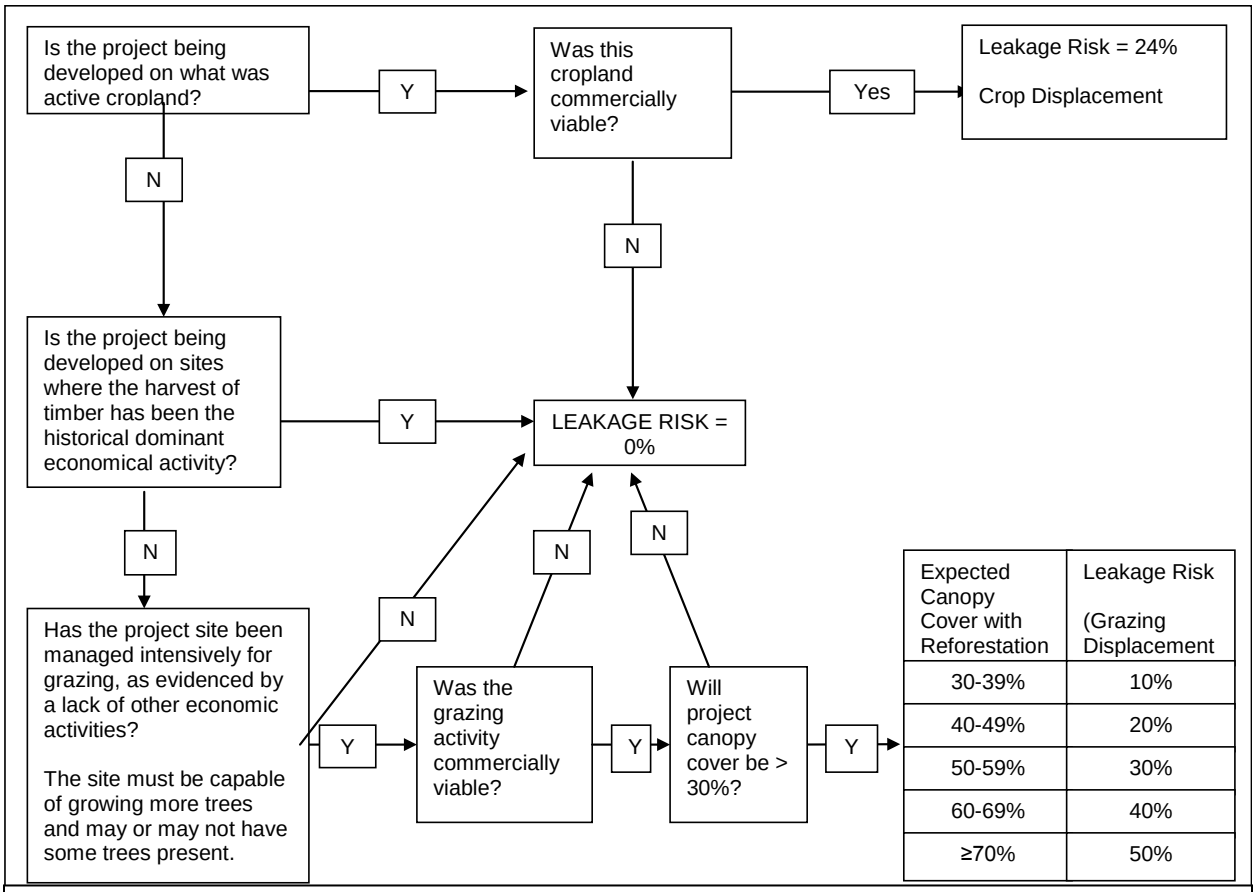
Equation 6.4. Total Secondary Effect Emissions

$$\mathbf{SE_y = (AS_y + MC_y)}\ \textit{or}\ \mathbf{0}\text{, whichever is lower}$$

Where,

SE_y	=	Secondary Effect GHG emissions caused by the project activity in year y (Equation 6.1)
AS_y	=	Secondary Effect CO_2e emissions due to shifting of cropland or grazing activities
MC_y	=	Secondary Effect CO_2e emissions due to mobile combustion from site preparation*

*Only occurs in year 1.



Expected Canopy Cover with Reforestation	Leakage Risk (Grazing Displacement
30-39%	10%
40-49%	20%
50-59%	30%
60-69%	40%
≥70%	50%

Figure 6.3. Activity Shifting ("Leakage") Risk Assessment for Reforestation Projects

6.2 Improved Forest Management Projects

Improved Forest Management Projects that take place on private land – or on land that is transferred to public ownership at the time the project is initiated – must estimate baseline onsite carbon stocks following the requirements and procedures in Section 6.2.1. Improved Forest Management Projects that take place on land that was publicly owned prior to the offset project commencement date must estimate baseline onsite carbon stocks following the requirements and procedures in Section 6.2.2. Requirements for determining baseline carbon in harvested wood products, determining actual onsite carbon stocks, determining actual carbon in harvested wood products, and quantifying Secondary Effects are the same for all Improved Forest Management Projects.

6.2.1 Estimating Baseline Onsite Carbon Stocks – Private Lands

Quantification Methodology

The baseline approach for Improved Forest Management Projects on private lands applies a standardized set of assumptions to offset project-specific conditions. A key assumption is that baseline carbon stocks will depend on how a project's initial standing live carbon stocks compare to "Common Practice," defined as the average standing live carbon stocks on similar lands within the Forest Project's Assessment Area. In addition, baseline carbon stocks must be adjusted to reflect management practice on the Forest Owner's other landholdings in instances where Project Area carbon stocks are more than 20 percent below the carbon stocks on land within the same logical management unit. Finally, the baseline must be modeled to reflect all legal and economic constraints affecting the Project Area.

The following steps must be followed to estimate baseline carbon stocks:

1. Determine the Common Practice level of above-ground standing live carbon stocks applicable to the Project Area.
2. Determine if the Project Area's initial above-ground standing live carbon stocks are above or below Common Practice.
3. Estimate baseline above-ground standing live carbon stocks, taking into account financial and legal constraints on harvesting in the Project Area, as well as the minimum baseline level applicable to the Project Area, as defined in the requirements for Step 3, below. The minimum baseline level will depend on whether initial above-ground standing live carbon stocks are above or below Common Practice.
4. Determine the baseline carbon stocks over 100 years for all required carbon pools in the Project Area.

For all calculations in this section, all values for "carbon stocks" should be expressed in metric tons of CO_2-equivalent.

Step 1 – Determine the Common Practice Carbon Stocks for the Project's Assessment Area

As defined in this protocol, Common Practice refers to the average stocks of above-ground standing live carbon associated with the Assessment Area(s) covered by the Project Area. Common Practice is used as a reference point for baseline estimation. To determine a value for Common Practice, see Appendix F and the data available in the Forest Offset Protocol Resources section of ARB's website.

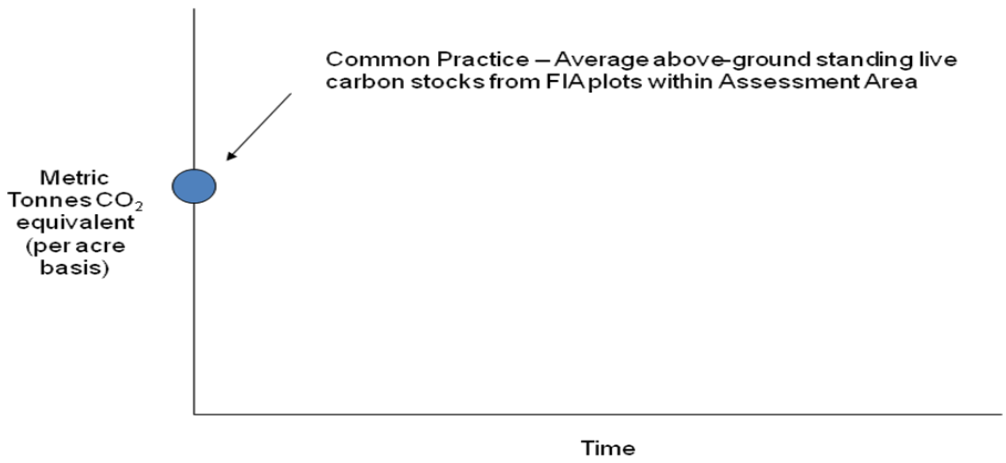


Figure 6.4. Common Practice as a Reference Point for Baseline Estimation

Step 2 – Determine if Initial Above-Ground Standing Live Carbon Stocks Are Above or Below Common Practice

To determine if initial above-ground standing live carbon stocks are above or below Common Practice, perform the following steps:

1. From the initial forest carbon inventory for the Project Area (conducted following the requirements in Appendix A), identify the metric tons of carbon contained in the *above-ground portion* of standing live carbon stocks.
2. Divide this amount by the number of acres in the Project Area.
3. Compare the result with the Common Practice value identified in Step 1.

Step 3 – Determine Baseline Above-Ground Standing Live Carbon Stocks

The baseline above-ground standing live carbon stocks must be determined by: (1) Modeling above-ground standing live carbon stocks through a series of growth and harvesting scenarios over 100 years; and (2) averaging the model results over the 100-year timeframe, so that the baseline is expressed as a single (average) value for above-ground standing live carbon stocks per acre in every year. The modeling must be performed following the requirements and methods in Appendix B and must meet the following conditions:

1. Growth and harvesting scenarios must reflect all legal constraints, following the requirements in Section 6.2.1.2.
2. Growth and harvesting scenarios must reflect any financial constraints, following the requirements in Section 6.2.1.3.
3. The averaged model results, expressed as above-ground standing live carbon stocks per acre, must not fall below a minimum baseline level (MBL). If initial above-ground standing live carbon stocks are above Common Practice, the MBL must be determined using the formula in Equation 6.5. If initial above-ground standing live carbon stocks are below Common Practice, then MBL must be determined using the formula in Equation 6.6.

A graphical example of a baseline meeting these conditions is provided in Figure 6.5 and Figure 6.6. Figure 6.5 shows the baseline before averaging; Figure 6.6 shows the baseline after averaging.

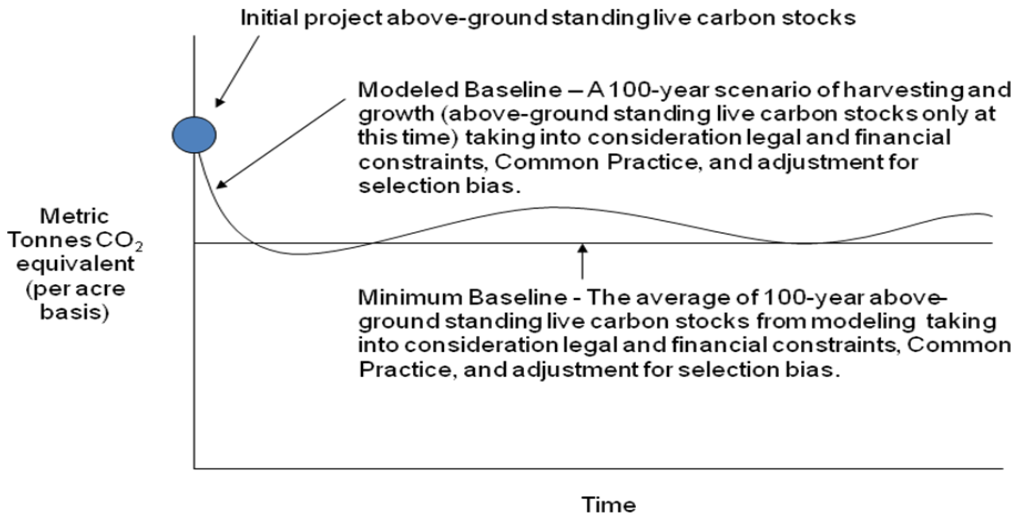


Figure 6.5. Modeling Standing Live Carbon Stocks Where Initial Stocks Are Above Common Practice

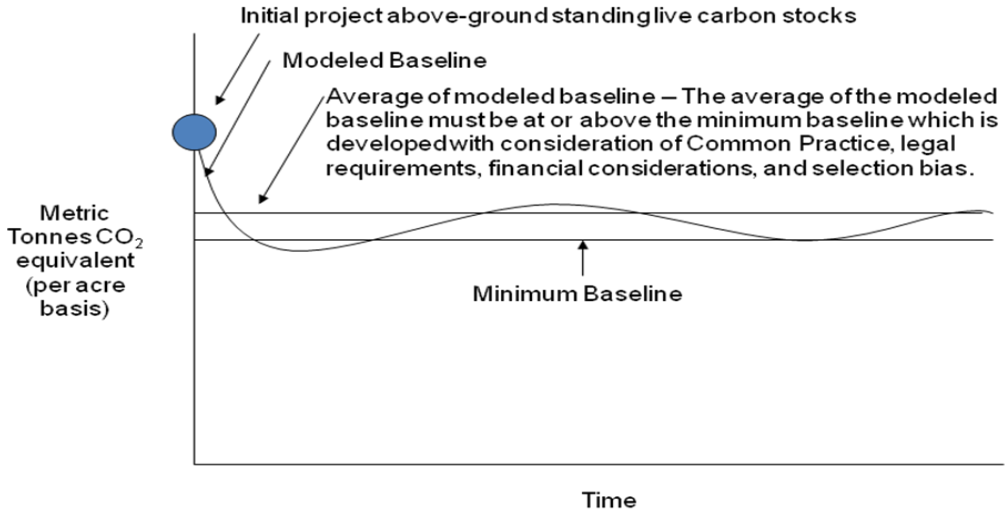


Figure 6.6. Averaging the Modeled Standing Live Carbon Stocks Where Initial Stocks Are Above Common Practice

Equation 6.5. Determining the Minimum Baseline Level Where Initial Stocks Are Above Common Practice

MBL = CP

Where,

MBL	=	Minimum baseline level (above-ground standing live carbon stocks)
CP	=	Common Practice (as determined in Step 1)

Equation 6.6. Determining the Minimum Baseline Level Where Initial Stocks Are Below Common Practice

MBL = MAX (MAX (HSR, ICS), MIN (CP, WCS))

Where,

MAX	=	The highest value in the set of values being evaluated.
MIN	=	The lowest value in the set of values being evaluated.
MBL	=	Minimum baseline level (above-ground standing live carbon stocks)
HSR	=	The "High Stocking Reference" for the Project Area. The High Stocking Reference is defined as 80 percent of the highest value for above-ground standing live carbon stocks per acre within the Project Area during the preceding 10-year period. To determine the High Stocking Reference, the Offset Project Operator or Authorized Project Designee must document changes in the Project Area's above-ground standing live carbon stocks over the preceding 10 years. Figure 6.7 presents a graphical portrayal of a High Stocking Reference determination.
CP	=	Common Practice (as determined in Step 1)
ICS	=	Initial above-ground standing live carbon stocks per acre within the Project Area (as determined in Step 2)
WCS	=	The weighted average above-ground standing live carbon stocks per acre for all Forest Owner (and affiliate) landholdings within the same logical management unit as the Project Area. See Section 6.2.1.1 for requirements and methods for calculating WCS.

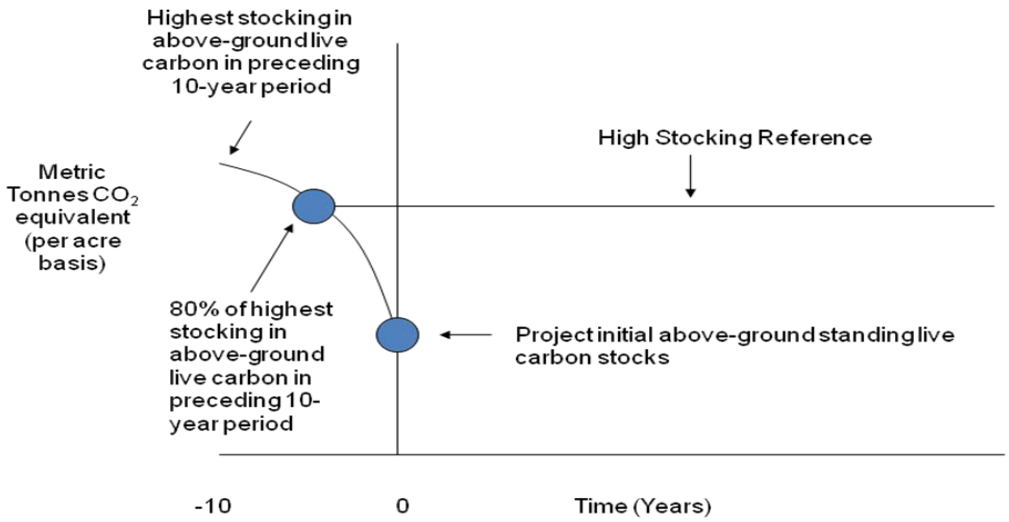


Figure 6.7. Determining a Project Area's High Stocking Reference
Note: It is possible for the High Stocking Reference to be higher than Common Practice, even where initial live-tree carbon stocks for the project are below Common Practice.

Step 4 – Determine the Baseline for All Carbon Pools

Once the baseline for above-ground standing live carbon stocks has been determined, perform the following steps:

1. Estimate baseline carbon stocks for all other required carbon pools identified for the offset project (including below-ground carbon stocks, as well as standing dead carbon stocks where applicable). These carbon stocks must be modeled or estimated following the requirements and methods in Appendix A and Appendix B.
2. Average the results, so that the baseline for other carbon pools contains the same (average) value for carbon stocks in every year.
3. Sum the above-ground standing live carbon stock baseline and the baseline for all other carbon stocks to produce a final baseline for all carbon pools (see Figure 6.8).

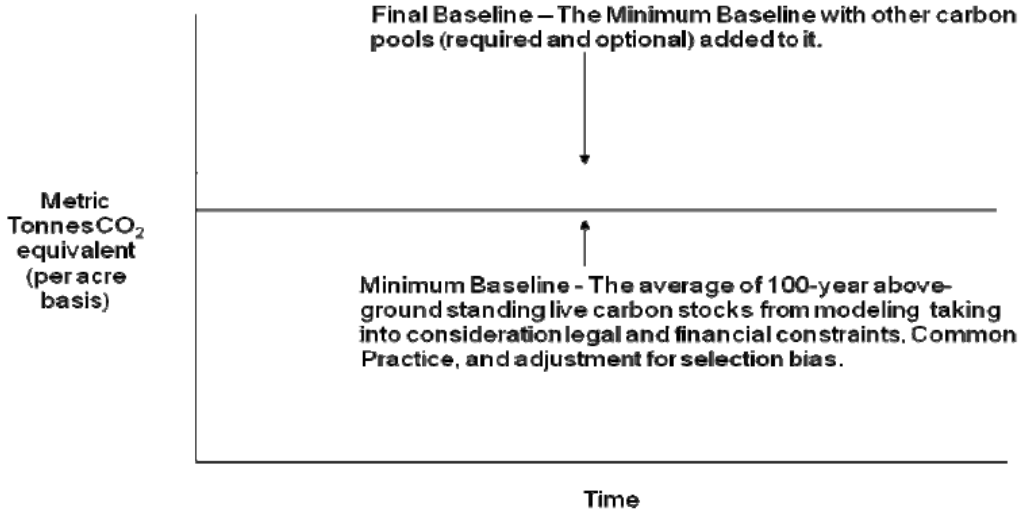


Figure 6.8. Final Baseline Incorporating All Required Carbon Stocks

6.2.1.1 Determining Weighted Average Carbon Stocks (WCS) on Lands in the Same Logical Management Unit as the Project Area

Quantification Methodology
Determining the minimum baseline level (MBL) for an Improved Forest Management project requires a comparison to carbon stocking levels on other lands within the same logical management unit (LMU) as the Project Area. The carbon stocking level within the LMU (expressed as the weighted average above-ground standing live carbon stocks per acre for all lands in the same LMU) is used as a parameter (WCS) for determining the MBL in Equation 6.6.

A “logical management unit” or “LMU” is defined as all land that the Forest Owner and its affiliate(s) (as defined below) either own in fee or hold timber rights on, and which it or they manage as an explicitly defined planning subunit. LMUs are generally characterized by unique biological, geographical, and/or geological conditions, are generally delimited by watershed boundaries and/or elevational zones, and contain unique road networks. In addition, an LMU must:

- Be a sustainable planning subunit as demonstrated by inventory reports and growth and harvest projections for the LMU or;
- Where even aged management is utilized, have a uniform distribution (by area) of 10-year age classes that extend to the normal rotation age (variation of any 10-year age class not to exceed 20%) or;
- Where uneven aged management is utilized, have between 33% and 66% of the forested stands exceeding the retention standards identified in the growth and harvest projections by a minimum of 25% (basal area).

An “affiliate” is defined as any person or entity that, directly or indirectly, through one or more intermediaries, controls or is controlled by or is under common control with the Forest Owner, including any general or limited partnership in which the Forest Owner is a partner and any limited liability company in which the Forest Owner is a member. For the purposes of this definition, "control" means the possession, direct or indirect, of the power to direct or cause the

direction of the management and policies of a person, whether through the ownership of voting securities, by contract or otherwise, and "person" means an individual or a general partnership, limited partnership, corporation, professional corporation, limited liability company, limited liability partnership, joint venture, trust, business trust, cooperative or association or any other legally-recognized entity.

If an explicit, existing LMU containing the Project Area cannot be identified, the LMU must be defined by identifying all lands where the Forest Owner and its affiliate(s) (as defined above) either own in fee or hold timber rights within the same Assessment Area(s) covered by the Project Area. Assessment Areas covered by the Project Area are identified in Step 1, above, using the information in Appendix F.

To calculate WCS, estimate the above-ground standing live carbon stocks per acre for the entire LMU containing the Project Area (including the Project Area itself). This can be done using either existing inventory data, or a stratified vegetation-type analysis.

6.2.1.1.1 Calculating WCS Using Inventory Data

Quantification Methodology

If sufficient inventory data for LMU lands exist to quantify above-ground standing live carbon stocks for the entire LMU, then the formula in Equation 6.7 must be used to calculate WCS.

Equation 6.7. Formula for WCS Using Inventory Data

$$If\ \left|\left(1-\frac{ECS}{ICS}\right)\right| \leq 0.2, then\ WCS = ICS$$

$$If\ \left|\left(1-\frac{ECS}{ICS}\right)\right| > 0.2, then\ WCS = \frac{ICS \cdot PA + ECS \cdot EA}{PA + EA}$$

Where,

WCS = The weighted average above-ground standing live carbon stocks per acre within the LMU containing the Project Area

ICS = Initial above-ground standing live carbon stocks per acre within the Project Area

PA = Size of the Project Area in acres

ECS = Above-ground standing live carbon stocks per acre within the LMU *but excluding the Project Area* (EA), as determined from existing inventory data

EA = Size of the LMU in acres, e*xcluding the Project Area*

6.2.1.1.2 Calculating WCS Using Stratified Vegetation-Type Analysis

Quantification Methodology

If sufficient inventory data is not available for the LMU, a stratified vegetation-type analysis must be used to calculate WCS. To conduct this analysis, all landholdings within the LMU – including the Project Area – must be divided into vegetation types and size class/canopy cover categories as delimited in Table 6.2 with a resolution for classification no greater than 40 acres. Each vegetation class has a "carbon rating" provided in Table 6.2. WCS must be calculated using the

ratio of average carbon stocking on LMU lands relative to carbon stocking on Project Area lands (referred to as the "stratified carbon weighting factor" or SWF). The required formulas are specified in Equation 6.8 and Equation 6.9.

Equation 6.8. Formula for WCS Using Stratified Vegetation-Type Analysis

$$If\ \left|\left(1-\frac{ECS}{ICS}\right)\right| \leq 0.2, then\ WCS = ICS$$

$$If\ \left|\left(1-\frac{ECS}{ICS}\right)\right| > 0.2, then\ WCS = \frac{ICS \cdot PA + SWF \cdot ICS \cdot EA}{PA + EA}$$

Where,

WCS = The weighted average above-ground standing live carbon stocks per acre within the LMU containing the Project Area

ECS = Above-ground standing live carbon stocks per acre within the LMU, but excluding the Project Area (EA), as determined from existing inventory data

ICS = Initial above-ground standing live carbon stocks per acre within the Project Area

PA = Size of the Project Area in acres

SWF = The stratified carbon weighting factor for the LMU (from Equation 6.9 below)

EA = Size of the LMU in acres, e*xcluding the Project Area*

Equation 6.9. Formula for LMU Stratified Carbon Weighting Factor

$$SWF = \frac{\sum_i (PA_i \cdot CR_i)}{\sum_i PA_i} \div \frac{\sum_i (EA_i \cdot CR_i)}{\sum_i EA_i}$$

Where,

PA_i = Acres of the Project Area in forest vegetation type *i* (from Table 6.2)

EA_i = Acres of the LMU, e*xcluding the Project Area,* in forest vegetation type *i* (from Table 6.2)

CR_i = Carbon rating for forest vegetation type *i* (from Table 6.2)

Table 6.2. Vegetation Classes for Stratification

Forest Vegetation Description	Average Diameter (Breast Height)	Average Canopy Cover	Carbon Rating (metric tons CO_2e)
Brush	0"	NA	0
Regeneration	3"	NA	0.5
Pole-sized trees	6" - 12"	< 33%	2
Pole-sized trees	6" - 12"	33% - 66%	4
Pole-sized trees	6" - 12"	>66%	6
Small Sawlogs	12" - 20"	< 33%	4
Small Sawlogs	12" - 20"	33% - 66%	8
Small Sawlogs	12" - 20"	>66%	12
Large Sawlogs	20" - 36"	< 33%	8
Large Sawlogs	20" - 36"	33% - 66%	16
Large Sawlogs	20" - 36"	>66%	24
Very Large Trees	>36"	< 33%	16
Very Large Trees	>36"	33% - 66%	32
Very Large Trees	>36"	>66%	48

6.2.1.2 Consideration of Legal Constraints

In modeling the baseline for standing live carbon stocks, all legal constraints that could affect baseline growth and harvesting scenarios must be incorporated. The standing live carbon stock baseline must represent a growth and harvesting regime that fulfills all legal requirements. Voluntary agreements that can be rescinded, such as rental contracts and forest certifications, are not legal constraints. Habitat Conservation Plans (HCPs) and Safe Harbor Agreements (SHAs) that are in place more than one year prior to the offset project commencement date shall be modeled as legal constraints. HCPs and SHAs that are approved after the date one year prior to the offset project~~'s~~ commencement date are not considered legal constraints for the purpose of baseline modeling and may be disregarded from the baseline modeling.

Legal constraints include all laws, regulations, and legally-binding commitments applicable to the Project Area at the time of offset project commencement that could affect standing live carbon stocks. Legal constraints include:

1. Federal, state, or local government regulations that are required and might reasonably be anticipated to influence carbon stocking over time including, but not limited to:
    a. Zones with harvest restrictions (e.g. buffers, streamside protection zones, wildlife protection zones)
    b. Harvest adjacency restrictions
    c. Minimum stocking standards
2. Forest practice rules, or applicable Best Management Practices established by federal, state, or local government that relate to forest management.
3. Other legally binding requirements affecting carbon stocks including, but not limited to, covenants, conditions and restrictions, and other title restrictions in place prior to or at the time of project initiation, including pre-existing conservation easements, Habitat Conservation Plans, Safe Harbor Agreements, and deed restrictions, excepting an

encumbrance that was put in place and/or recorded less than one year prior to the offset project commencement date, as defined in Section 3.5.

For forest projects located in California, the baseline must be modeled to reflect all silvicultural treatments associated with any submitted, active, or approved timber harvest plans (THPs) at the time of offset project commencement that would affect harvesting and management within the Project Area during the Project Life. All legally enforceable silvicultural and operational provisions of a THP – including those operational provisions designed to meet California Forest Practice Rules requirements for achieving Maximum Sustained Production of High Quality Wood Products [14 CCR 913.11 (933.11, 953.11)] – are considered legal constraints and must be reflected in baseline modeling for as long as the THP will remain active. For portions of the Project Area not subject to THPs (or over time periods for which THPs will not be active), baseline carbon stocks must be modeled by taking into account any applicable requirements of the California Forest Practice Rules and all other applicable laws, regulations, and legally binding commitments that could affect onsite carbon stocks. On a case-by-case basis, the California Department of Forestry and Fire Protection (Cal FIRE) may assist in identifying minimum carbon stocking levels that would be effectively required under California Forest Practice Rules.

6.2.1.3 Consideration of Financial Constraints

In modeling the baseline for standing live carbon stocks, financial constraints that could affect baseline growth and harvesting scenarios must be included. It must be demonstrated that the growth and harvesting regime assumed for the baseline is financially feasible through one of the following means:

1. A financial analysis of the anticipated growth and harvesting regime that captures all relevant costs and returns, taking into consideration all legal, physical, and biological constraints. Cost and revenue variables in the financial analysis may be based on regional norms or on documented costs and returns for the Project Area or other properties in the Forest Project's Assessment Area.
2. Providing evidence that activities similar to the proposed baseline growth and harvesting regime have taken place on other properties within the Forest Project's Assessment Area within the past 15 years. The evidence must demonstrate that harvesting activities have taken place on at least one other comparable site with:
    a. Slopes that do not exceed slopes in the Project Area by more than 10 percent
    b. An equivalent zoning class to the Project Area
    c. Comparable species composition to the Project Area (i.e. within 20 percent of project species composition based on trees per acre)

6.2.2 Estimating Baseline Onsite Carbon Stocks – Public Lands

Quantification Methodology

For Improved Forest Management Projects on lands owned or controlled by public agencies, the baseline must be estimated by:

1. Conducting an initial forest carbon inventory for the Project Area
2. Projecting future changes to Project Area forest carbon stocks by:
    a. Extrapolating from historical trends
    b. Anticipating how current public policy will affect onsite carbon stocks

The method that results in the highest estimated carbon stock levels must be used to determine the baseline.

To extrapolate from historical trends:

- For Project Areas that have a ten-year history of declining carbon stocks, the baseline must be defined by the average of the carbon stocks over the past ten years and considered static for the project life (i.e. the same level of carbon stocks is assumed in every year).
- For Project Areas that demonstrate an increasing inventory of carbon stocks over the past ten years, the growth trajectory of the baseline shall continue until the forest (under the baseline stocks) achieves a stand composition consistent with comparable forested areas that have been relatively free of harvest over the past 60 years.

To anticipate how current public policy will affect onsite carbon stocks, the baseline must be modeled following the requirements and methods in Appendix B incorporating constraints imposed by all applicable statutes, regulations, policies, plans and Activity-Based Funding.

6.2.3 Estimating Baseline Carbon in Harvested Wood Products

Quantification Methodology

To estimate the amount of baseline carbon transferred to long-term storage in wood products each year, the following steps must be performed:

1. Determine the *average* amount of carbon in standing live carbon stocks (prior to delivery to a mill) that would have been harvested in each year of the baseline over 100 years. The result will be a uniform estimate of harvested carbon in each year of the baseline. This estimate is determined at offset project commencement, using the same biomass equations used to calculate biomass in live trees, and will not change over the course of the project.
    a. For offset projects on private lands, the amount of harvested carbon must be derived from the growth and harvesting regime used to develop the baseline for onsite carbon stocks in Section 6.2.1.
    b. For offset projects on public lands, the amount of harvested carbon must be derived from the growth and harvesting regime assumed in the baseline for onsite carbon stocks derived in Section 6.2.2.
2. On an annual basis, determine the amount of harvested carbon that would have remained stored in wood products, averaged over 100 years, following the requirements and methods in Appendix C.

6.2.4 Determining Actual Onsite Carbon Stocks

Quantification Methodology

Actual carbon stocks for Improved Forest Management projects must be determined by updating the Project Area's forest carbon inventory. This is done by:

1. Incorporating any new forest inventory data obtained during the previous year into the inventory estimate. Any plots sampled during the previous year must be incorporated into the inventory estimate.
2. Using an approved model to "grow" (project forward) prior-year data from existing forest inventory plots to the current reporting year. Approved growth models and requirements and methods for projecting forest inventory plot data using models are provided in Appendix B.
3. Updating the forest inventory estimate for harvests and/or disturbances that have occurred during the previous year.
4. Applying an appropriate confidence deduction for the inventory based on its statistical uncertainty, following the requirements and methods in Appendix A, Section A.4.

6.2.5 Determining Actual Carbon in Harvested Wood Products

Quantification Methodology

Perform the following steps to determine actual carbon in harvested wood products:

1. Determine the actual amount of carbon in standing live carbon stocks (prior to delivery to a mill) harvested in the current year (based on harvest volumes determined in Section 6.2.4).
2. Determine the amount of actual harvested carbon that will remain stored in wood products, averaged over 100 years, following the requirements and methods in Appendix C.

6.2.6 Quantifying Secondary Effects

Quantification Methodology

For Improved Forest Management Projects, significant Secondary Effects can occur if a project reduces harvesting in the Project Area, resulting in an increase in harvesting on other properties. Equation 6.10 must be used to estimate Secondary Effects for Improved Forest Management projects:

Equation 6.10. Secondary Effects Emissions

$$If \sum_{n=1}^{y}(AC_{hv,n} - BC_{hv,n}) > 0, then\ \ SE_y = 0$$

$$If \sum_{n=1}^{y}(AC_{hv,n} - BC_{hv,n}) < 0, then\ SE_y = (AC_{hv,y} - BC_{hv,y}) \times 20\%$$

Where,

SE_y	=	Estimated annual Secondary Effects (used in Equation 6.1.)
$AC_{hv,\ n}$	=	Actual amount of onsite carbon harvested in reporting period n (prior to delivery to a mill), expressed in CO_2-equivalent tons
$BC_{hv,\ n}$	=	Estimated average baseline amount of onsite carbon harvested in reporting period n (prior to delivery to a mill), expressed in CO_2-equivalent tons, as determined in Step 1 of Section 6.2.3
Y	=	The current year or reporting period

6.3 Avoided Conversion Projects

6.3.1 Estimating Baseline Onsite Carbon Stocks

Quantification Methodology

The baseline for Avoided Conversion Projects is a projection of onsite forest carbon stock losses that would have occurred over time due to the conversion of the Project Area to a non-forest land use. Estimating the baseline for Avoided Conversion Projects involves two steps:

1. Characterizing and projecting the baseline; and
2. Discount for the uncertainty of conversion probability.

Step 1 - Characterizing and Projecting the Baseline

The project baseline must be characterized by:

1. Clearly specifying an alternative highest-value land use for the Project Area, as identified by an appraisal (required in Section 3.1.2.3).
2. Estimating the rate of conversion and removal of onsite carbon stocks, taking into consideration any laws, statutes, regulations, or other legal mandates that affect land use conversion or removal of onsite carbon stocks. The rate of conversion and removal of onsite carbon stocks must be estimated by either:
    a. Referencing planning documentation for the Project Area (e.g. construction documents or plans) that specifies the timeframe of the conversion and intended removal of forest cover on the Project Area; or
    b. In the absence of specific documentation, identifying default Total Conversion Impact and Annual Conversion values from Table 6.3.
3. Using a computer simulation to project changes in onsite carbon stocks over 100 years, reflecting the rate of conversion estimated in (2). The simulation must model changes in onsite carbon stocks for all required carbon pools, as identified in Section 5.3.

Table 6.3. Default Avoided Conversion

Type of Conversion Identified in Appraisal	Total Conversion Impact This is the assumed total effect over time of the conversion activity. (The total conversion impact is amortized over a 10-year period to determine the annual conversion in the next column.)	Annual Conversion This is the assumed annual conversion activity. The percentages below are multiplied by the initial onsite carbon stocks for the project on an annual basis for the first 10 years of the project.
Residential	Estimate using the following formula: TC = min(100, (P*3 / PA)*100) *Where:* TC = % total conversion (TC cannot exceed 100%) PA = the Project Area (acres) identified in the appraisal P = the number of unique parcels that would be formed on the project area as identified in the appraisal *Each parcel is assumed to deforest 3 acres of forest vegetation.	Estimate using the following formula: AC = TC / 10 *Where:* AC = % annualized conversion TC = % total conversion
Mining and agricultural conversion, including pasture or crops	90%	9.0%
Golf course	80%	8.0%
Commercial buildings	95%	9.5%

The computer simulation of the baseline must apply the identified rate of conversion over time to estimate changes in onsite carbon stocks, beginning with the Project Area's initial onsite carbon stocks.

If the projected conversion rate does not result in a complete removal of onsite forest carbon stocks, the baseline projection should account for any residual forest carbon value as a steady condition for the balance of a 100-year projection.

Step 2 - Discount for Uncertainty of Conversion Probability

If the fair market value of the anticipated alternative land use for the Project Area (as determined by the appraisal required in Section 3.1.2.3) is *not more than 80 percent greater* than the value of the current forested land use, then a discount must be applied each year to the offset project's quantified GHG reductions and GHG removal enhancements. If quantified GHG reductions and GHG removal enhancements for the year are positive (i.e. $[(\Delta AC_{onsite} - \Delta BC_{onsite}) + (AC_{wp,y} - BC_{wp,y}) * 80\% + SE_y] > 0$ in Equation 6.1) then use the following formula (Equation 6.11) to calculate the appropriate Avoided Conversion Discount factor, ACD. If quantified GHG reductions and removals for the year are negative, then ACD must equal zero.

Equation 6.11. Avoided Conversion Discount Factor

If $0.4 < ((VA / VP) - 1) < 0.8$, **then** $ACD = [80\% - ((VA / VP) - 1)] \times 2.5$
If $((VA / VP) - 1) > 0.8$, **then** $ACD = 0\%$
If $((VA / VP) - 1) < 0.4$, **then** $ACD = 100\%$

Where,

ACD	=	The Avoided Conversion Project discount factor (used in Equation 6.1).
VA	=	The appraised fair market value of the anticipated alternative land use for the Project Area
VP	=	The appraised fair market value of the current forested land use for the Project Area

6.3.2 Estimating Baseline Carbon in Harvested Wood Products

Quantification Methodology

Harvesting is assumed to occur in the baseline over time as the Project Area is converted to another land use. To estimate the baseline carbon transferred to long-term storage in harvested wood products each year:

1. Determine the amount of carbon in standing live carbon stocks (prior to delivery to a mill) that would have been harvested in each year, consistent with the rate of reduction in baseline standing live carbon stocks determined in Section 6.3.1. This projection is determined at offset project commencement, using the same biomass equations used to calculate biomass in live trees, and will not change over the course of the offset project.
2. On an annual basis, determine the amount of harvested carbon that would have remained stored in wood products, averaged over 100 years, following the requirements and methods in Appendix C.

6.3.3 Determining Actual Onsite Carbon Stocks

Quantification Methodology

Actual carbon stocks for Avoided Conversion Projects must be determined by updating the Project Area's forest carbon inventory. This is done by:

1. Incorporating any new forest inventory data obtained during the previous year into the inventory estimate. Any plots sampled during the previous year must be incorporated into the inventory estimate.
2. Using an approved model to "grow" (project forward) prior-year data from existing forest inventory plots to the current reporting year. Approved growth models are identified in Appendix B. Methods for projecting forest inventory plot data using models is also provided in Appendix B.
3. Updating the forest inventory estimate for harvests and/or disturbances that have occurred during the previous year.
4. Applying an appropriate confidence deduction for the inventory based on its statistical uncertainty, following the requirements and methods in Appendix A, Section A.4.

6.3.4 Determining Actual Carbon in Harvested Wood Products

Quantification Methodology

Perform the following steps to determine actual carbon in harvested wood products:

1. Determine the actual amount of carbon in standing live carbon stocks (prior to delivery to a mill) harvested in the current year (based on harvest volumes determined in Section 6.3.3).
2. Determine the amount of actual harvested carbon that will remain stored in wood products, averaged over 100 years, following the requirements and methods in Appendix C.

6.3.5 Quantifying Secondary Effects

Quantification Methodology

Significant Secondary Effects for Avoided Conversion projects can arise if the type of land use conversion that would have happened on the Project Area is shifted to other forest land.

To quantify Secondary Effects for Avoided Conversion projects, use Equation 6.12.

The value for Secondary Effect emissions will always be negative or zero.

Equation 6.12. Secondary Effects Emissions

$$\mathbf{SE_y = (-1) \times CDR\% \times (\Delta\, AC_{onsite} - \Delta\, BC_{onsite})} \text{ or } \mathbf{0}\text{, whichever is lower}$$

Where,

SE_y	=	Secondary Effect GHG emissions caused by the project activity in year y (Equation 6.1)
CDR	=	Conversion displacement risk value, assumed to be 3.6% for all forest lands
$\Delta\, AC_{onsite}$	=	Annual difference in actual onsite carbon (CO_2e) as defined in Equation 6.1
$\Delta\, BC_{onsite}$	=	Annual difference in baseline onsite carbon (CO_2e) as defined in Equation 6.1

7 Ensuring the Permanence of Credited GHG Reductions and GHG Removal Enhancements

The Regulation requires that credited GHG reductions and GHG removal enhancements be "permanent." Permanence of Forest project GHG reductions and removals is addressed through three mechanisms:

1. The requirement for all offset projects to monitor onsite carbon stocks, submit annual Offset Project Data Reports, and undergo third-party verification of those reports with site visits at least every six years for the duration of the Project Life.
2. The regulatory obligation for all intentional reversals of GHG reductions and GHG removal enhancements to be compensated for through retirement of other Compliance Instruments.
3. The maintenance of a Forest Buffer Account by ARB to provide insurance against reversals of GHG reductions and GHG removal enhancements due to unintentional causes (including natural disturbances such a fires, pest infestations, or disease outbreaks).

GHG reductions and GHG removal enhancements can be "reversed" if the stored carbon associated with them is released (back) to the atmosphere. Many biological and non-biological agents, both natural and human-induced, can cause reversals. Some of these agents cannot completely be controlled and may therefore result in an unintentional reversal, such as natural agents like fire, insects, and wind. Other agents can be controlled, such as the human activities like land conversion and over-harvesting. Under this protocol, reversals due to controllable agents are considered intentional as defined in the Regulation. The Offset Project Operator or Authorized Project Designee is required to identify and quantify the risk of reversals from different agents based on offset project-specific circumstances. The resulting risk rating determines the quantity of ARB offset credits that the project must contribute to the Forest Buffer Account to insure against unintentional reversals.

7.1 Identifying a Reversal

The Offset Project Operator or Authorized Project Designee must demonstrate, through annual reporting and periodic verification, that stocks associated with credited GHG reductions and GHG removal enhancements are maintained for a period of time considered to be permanent. For purposes of this protocol 100 years is considered permanent. If the quantified GHG reductions and GHG removal enhancements (i.e. QR_y in Equation 6.1) in a given year are negative, and ARB offset credits were issued to the Forest Project in any previous year, it is considered a reversal, regardless of the cause of the decrease. Planned thinning or harvesting activities, for example, may cause a reversal if they result in a negative value for QR_y.

7.2 Insuring Against Reversals

Unintentional reversals are insured against by contributing a percentage of ARB offset credits to a Forest Buffer Account. The amount of the contribution is based on a project-specific risk evaluation.

7.2.1 About the Forest Buffer Account

A Forest Buffer Account is a holding account for ARB offset credits issued to Forest Project, which is administered by ARB. All Forest Projects must contribute a percentage of ARB offset

credits to the Forest Buffer Account any time ARB offset credits are issued by ARB for verified GHG reductions and GHG removal enhancements. Each Forest Project's contribution is determined by a project-specific risk rating, as described in Section 7.2.2. If a Forest Project experiences an unintentional reversal of credited GHG reductions and GHG removal enhancements (as defined in Section 7.3), ARB offset credits from the Forest Buffer Account will be retired in an amount equal to the total amount of carbon that was reversed (measured in metric tons of CO_2-equivalent) according to the process identified in the Regulation. A Forest Buffer Account therefore acts as a general insurance mechanism against unintentional reversals for ARB offset credits issued to Forest Projects.

7.2.2 Contributions to the Forest Buffer Account

ARB offset credits will be contributed to the Forest Buffer Account pursuant to the Regulation based on the reversal risk rating for a project as determined by the requirements and methods in Appendix D. The risk rating must be determined prior to listing, and recalculated in every year the project undergoes verification. Forest Owners who record a Qualified Conservation Easement in conjunction with implementing a Forest Project will receive a lower risk rating (see Appendix D).

7.3 Compensating for Reversals

The Regulation defines reversals and establishes how reversals will be compensated.

7.3.1 Unintentional Reversals

The Regulation defines unintentional reversals. Requirements for compensating unintentional reversals are set forth in the Regulation.

7.3.2 Intentional Reversals

The Regulation defines intentional reversals. Requirements for intentional reversals are set forth in the Regulation.

7.4 Disposition of Forest Projects after a Reversal

Provisions related to the disposition of a Forest Project after a reversal are set forth in the Regulation. These provisions dictate under what circumstances a Forest Project that undergoes an intentional or unintentional reversal would be terminated and under what circumstances the Forest Project may continue without termination.

8 Offset Project Monitoring

General requirements for monitoring, reporting, and record retention are provided in the Regulation. The Offset Project Operator or Authorized Project Designee must conduct monitoring activities and submit Offset Project Data Reports in accordance with the Regulation and this protocol. Monitoring is required for a period of 100 years following the final issuance of any ARB or registry offset credits to an offset project.

For Forest Projects, monitoring activities consist primarily of updating a project's forest carbon inventory. ARB requires a complete inventory of carbon stocks to be reported each year. This complete inventory must be maintained and updated throughout the Project Life.

8.1 Forest Carbon Inventory Program

Prior to a Forest Project's first verification, a documented forest carbon inventory program, including an inventory monitoring plan and a modeling plan, must be established detailing the specific methods that will be used to update the project's forest carbon inventory on an annual basis. The forest carbon inventory program must adhere to the requirements and methods in Appendices A and B, which establish the equations for computing biomass and limits to which computer models can be used in the inventory update process.

8.2 Annual Monitoring Requirements

The Offset Project Operator or Authorized Project Designee is required to report the Forest Project's onsite carbon stocks each year in an Offset Project Data Report. The Offset Project Data Report must include an estimate of carbon stocks in all required carbon pools. The estimate must reflect the appropriate confidence deduction as determined by the steps in Appendix A, Section A.4. Annual onsite carbon stock estimates are computed from inventory data. Inventory data are updated annually by:

1. Incorporating any new forest inventory data obtained during the previous year.
2. Modeling growth in sample plots using approved growth models and stand table projection methods (see Appendix B regarding growth models and stand table projections).
3. Updating the forest inventory data for harvests and/or disturbances that have occurred during the previous year.

Specific methods used to update the forest inventory must follow the inventory methodologies approved at the time the project is initially verified. Modifications to inventory methodologies must be approved in advance by a third-party verification body and by ARB, and documented in the change log.

9 Reporting Requirements

This section provides supplemental requirements for reporting in addition to requirements contained in the Regulation. Offset Project Data Reports must be submitted at the conclusion of every Reporting Period.

9.1 Offset Project Documentation

In order for the offset project to be Listed, all of the information specified in the Project Listing Requirements in Section 9.1.1 must be submitted, along with any additional information specified in the Regulation. Reporting deadlines and record retention requirements are contained in the Regulation.

All reports that reference carbon stocks must be submitted with the oversight of a Professional Forester. If the offset project is located in a jurisdiction without a Professional Forester law or regulation, then a Professional Forester must either have the Certified Forester credentials managed by the Society of American Foresters, or other valid professional forester license or credential approved by a government agency in a different jurisdiction.

9.1.1 Offset Project Listing Requirements

The listing information in this section must be submitted by the Offset Project Operator or Authorized Project Designee prior to the Listing of the offset project. This information is also submitted as part of the first Offset Project Data Report, and is subject to verification at the initial offset project verification. The following listing information must be submitted no later than the date at which the Offset Project Operator or Authorized Project Designee submits the first Offset Project Data Report:

9.1.1.1 All Offset Projects[7]

1. Offset project name.
2. Offset project contact information, including name, phone number, address, and email address for:
    a. Offset Project Operator
    b. Authorized Project Designee (if applicable);
3. Whether the Offset Project Operator is the owner in fee for the project area.
    a. If yes, provide documentation (e.g. deed of trust, title report) showing the Offset Project Operator's ownership interest in the property and its interest in the trees and standing timber on the property.
    b. If no, explain how the entity identified as the Offset Project Operator has the right to undertake and list the project and provide documentation supporting the explanation.
4. Offset project type (reforestation, improved forest management, or avoided conversion).
5. A description of the management activities that will lead to increased carbon stocks in the Project Area, compared to the baseline.

[7] Reforestation projects as qualified in section 6.1 can defer the items that are marked with an asterisk until the second site-visit verification.

6. Indicate if the offset project occurs on public or private lands, and further specify if the offset project occurs on any of the following categories of land:
    a. Land that is owned by, or subject to an ownership or possessory interest of a Tribe;
    b. Land that is “Indian lands” of a Tribe, as defined by 25 U.S.C. §81(a)(1); or
    c. Land that is owned by any person, entity, or Tribe, within the external borders of such Indian lands.
7. Offset project commencement date, with an explanation and justification of the commencement date.
    a. Specify the action(s) that identify the offset project commencement date.
8. A statement as to whether any GHG reductions or GHG removal enhancements associated with the Project Lands have ever been listed or registered with, or otherwise claimed by, another registry or program, or sold to a third party prior to listing, including;
    a. Have any lands within the Project Area ever been listed or registered with an offset project registry or program in the past?
    b. Have greenhouse gas emission reductions or removal enhancements associated with lands within the Project Area been credited or claimed for the purpose of greenhouse gas mitigation or reduction goals, whether in a voluntary or regulatory context?
    c. If yes, identify the registry or program (include vintages and reporting period).
9. A statement as to whether the project is being implemented and conducted as the result of any law, statute, regulation, court order, or other legally binding mandate? If yes, explain.
10. Declaration that the offset project does *not* employ broadcast fertilization.
11. If the Forest Project is located on public land, a description and copies of the documentation demonstrating explicit approval of the offset project’s management activities and baseline including any public vetting processes necessary to evaluate management and policy decisions concerning the offset project.
12. If the Forest Project is located on the following categories of land, a description and copies of documentation demonstrating that the land within the Project Area is owned by a tribe or private entities:
    a. Land that is owned by, or subject to an ownership or possessory interest of a Tribe;
    b. Land that is “Indian lands” of a Tribe, as defined by 25 U.S.C. §81(a)(1); or
    c. Land that is owned by any person, entity, or Tribe, within the external borders of such Indian lands.
13. If commercial harvesting is either planned or ongoing within the Project Area, a description of how the Forest Owner satisfies one of the three requirements for employing and demonstrating sustainable long-term harvesting practices on all of its forest landholdings (refer to Section 3.8.1).
14. A description of how the offset project meets (or will meet) the definition of “Natural Forest Management” (refer to Section 3.8.2), including:
    a. Composition of native species;
    b. Distribution of age classes / sustainable management;
    c. Structural elements (standing and lying dead wood);
15. Descriptions and maps of the Project Area boundaries that include:
    a. Governing jurisdictions, and latitude/longitude coordinates
    b. Public and private roads (map)
    c. Towns (map)

   d. Major watercourses (4th order or greater), water bodies, and watershed description (map)
   e. Topography (map)
   f. Townships, ranges, and sections or latitude and longitude (map)
   g. Existing land cover and land use (description with optional map)
   h. Forest vegetation types (description with optional map)
   i. Site classes (description with optional map)
   j. Land pressures and climate zone/classification (description with optional map)
   k. Historical land uses, current zoning, and projected land use within project area and surrounding areas (description with optional map)
   l. A georeferenced shape file (or other electronic file that can be read in a geographic information system) that clearly identifies the project area and boundaries. This file may constitute the required map if it includes the required map information listed above.
16. Identify what assessment area or areas contain lands within the Project Area.
   a. Include how many acres of project lands fall within each assessment area.
   b. Include a value for total project area acreage.
17. General description of the forest conditions within the Project Area:
   a. Species (tree) composition;
   b. Age class distribution;
   c. Management history;
18. Indicate whether the project will employ a Qualified Conservation Easement.
   a. If yes, include the date the Qualified Conservation Easement was or will be recorded, the terms that affect forest management within the easement, and provide a copy of the Qualified Conservation Easement to ARB.
19. *A description of the inventory methodology for each of the carbon pools included in the Forest Project's Offset Project Boundary. The inventory methodology must describe the information required in Appendix A.3.
20. *A description of the calculation methodologies for determining metric tons per acre for each of the carbon pools included in the Offset Project Data Report.
21. *A modeling plan, following the requirements and methods in Appendix B, Section B.3.
22. *A diagram of the final baseline incorporating all required carbon stocks.
23. *A summary of the inventory of carbon stocks for each carbon pool.
24. *A summary of inventory confidence statistics.
25. *A description and estimate of the Forest Project's baseline onsite carbon stocks. Baseline onsite carbon stocks must be portrayed in a graph depicting time in the x-axis and metric tons CO_2-equivalent in the y-axis. The graph should be supported with written characterizations that explain any annual changes in baseline carbon stocks over time.
26. *An estimate of carbon that will be stored long-term in harvested wood products in the baseline.
27. *Calculation of the offset project's reversal risk rating and contribution to the Forest Buffer Account.

9.1.1.2 Reforestation Projects

In addition to the information in Section 9.1.1.1, the following information must be provided for Reforestation projects:

1. An explanation of how the Project Lands, at the time of offset project commencement, meets the eligibility requirements of a) less than 10 percent tree canopy cover for a

minimum of 10 years; or b) subject to a significant disturbance that has removed at least 20 percent of the land's above-ground live biomass. The explanation should include why the forest was out of forest cover or a description of the disturbance if a natural significant disturbance occurred.

2. For a Reforestation Project that occurs on land that has undergone a recent Significant Disturbance, indicate the eligibility scenario pertaining to the project site as identified in Appendix E, or a description of how the Forest Project occurs on a type of land for which the Forest Owner has not historically engaged in or allowed timber harvesting.
3. A qualitative characterization of baseline conditions, including an assessment of the likely vegetative conditions and activities that would have occurred in the absence of the project, taking into consideration any laws, statutes, regulations, or other legal mandates that would encourage or require reforestation on the Project Area. The qualitative assessment shall include an assessment of the commercial value of trees within the project area over the next 30 years.
4. List any laws, statutes, regulations or other legal mandates that would encourage or require reforestation on the project area.

9.1.1.3 Improved Forest Management Projects on Private Lands

In addition to the information in Section 9.1.1.1, the following information must be provided for Improved Forest Management projects on private lands:

1. Documentation that the Project Area has greater than 10 percent tree canopy cover.
2. A determination of how the Forest Project's initial standing live carbon stocks compare to Common Practice, as required in Section 6.2.1.
3. If the Forest Project's initial standing live carbon stocks are below Common Practice, a determination of the "High Stocking Reference" for the Project Area. To determine the High Stocking Reference, changes in the Project Area's live-tree carbon stocks over the preceding 10 years must be documented.
    a. Include an affidavit testifying that the inventory depicted over the past 10 years is reasonably accurate.
    b. Include a summary of volume harvested over the past 10 years.
4. Documentation of any and all legal constraints affecting forest management activities on the Project Area. The documentation of legal constraints must include:
    a. A description of each constraint (refer to Section 6.2.1.2).
    b. A narrative that describes the effect of the constraint on forest management.
    c. A description of the modeling techniques used to simulate the effects of the constraint.
5. A demonstration that the growth and harvesting regime assumed for the baseline is financially feasible following the requirements of Section 6.2.1.3.

9.1.1.4 Improved Forest Management Projects on Public Lands

In addition to the information in Section 9.1.1.1, the following information must be provided for Improved Forest Management projects on public lands:

1. Documentation demonstrating that the offset project takes place on land that has greater than 10 percent tree canopy cover.
2. A projection of future changes to Project Area forest carbon stocks by extrapolating from historical trends; and anticipating how current public policy will affect onsite carbon stocks per the requirements of Section 6.2.2.

3. An explanation of how current public policy will affect onsite carbon stocks and how, the baseline modeling incorporates constraints imposed by all applicable statutes, regulations, policies, plans and Activity-Based Funding.

9.1.1.5 Avoided Conversion Projects

In addition to the information in Section 9.1.1.1, the following information must be provided for Avoided Conversion projects:

1. Documentation demonstrating the planned or completed dedicating of the land in the Project Area to continuous forest cover through a Qualified Conservation Easement or transfer to public ownership.
2. Documentation demonstrating that the type of anticipated land use conversion is legally permissible per the requirements of Section 3.1.1.3.
3. A description of how the Project Area was determined, following the requirements in Section 4.
4. A full copy of the appraisal that was prepared for the Project Area per the requirements of Section 3.2.1.3.
5. A description of the highest value alternative land use identified in the appraisal.
6. An estimate the rate of conversion and removal of onsite carbon stocks per the requirements in Section 6.3.1.
7. A comparison of the fair market value of the anticipated alternative land use for the Project Area with the value of the current forested land use, and the calculation of an appropriate uncertainty discount (following the requirements in Section 6.3.1).
8. Where the anticipated alternative land use is commercial, residential or agricultural use, indicate the maximum slope of the project area.
9. Where the anticipated alternative land use is mining, describe the extent of mineral resources existing in the Project Area.
10. Where the anticipated alternative land use is commercial, residential or recreational use, indicate:
    a. The proximity of the Project Area to metropolitan areas;
    b. The proximity of the Project Area to grocery and fuel services and accessibility of those services;
    c. Population growth (people per year) within 180 miles of the Project Area.

9.2 Offset Project Data Report

Offset Project Operators or Authorized Project Designees must submit an Offset Project Data Report each year according to the reporting schedule in the Regulation. The listing information in Section 9.1.1 must be included in the initial Offset Project Data Report, and is subject to verifier review during the initial verification. All Offset Project Data Reports must include the information in section 9.2.1.

9.2.1 Annual Reporting

An Offset Project Data Report must be prepared for each reporting period during the Project Life. Offset Project Data Reports must be provided to verification bodies whenever a Forest Project undergoes verification. Offset Project Data Reports must contain an annual update of the project's forest carbon inventory (Section 8.2). Each report must also contain the following information. Reforestation Projects, as qualified in Section 6.1, can defer the items that are marked with an asterisk until submitting the offset project data report that will undergo the second verification.

1. Offset project name.
2. Offset project contact information, including name, phone number, address, and email address for:
    a. Offset Project Operator
    b. Authorized Project Designee (if applicable);
3. Reporting Period.
4. A statement as to whether the Forest Project and associated Project Lands have met and been in compliance with all local, state, or federal regulatory requirements during the reporting period. If not, an explanation of the non-compliance must be provided.
5. A statement as to whether all the information submitted for project Listing is still accurate. If not provided updates to the relevant listing information.
6. An updated estimate of the reporting period's carbon stocks in all required carbon pools.
7. *The appropriate confidence deduction for the forest carbon inventory following the requirements and methods in Appendix A, Section A.4)
8. *An explanation of any decrease over any 10-year consecutive period in the standing live carbon pool.
9. Any changes in the status of the Forest Owner including, if applicable per Section 3.8.1, the acquisition of new forest landholdings.
10. A description of how the project meets (or will meet) the definition of "Natural Forest Management" (refer to Section 3.8.2), including progress on criteria that have not been fully met in previous years.
11. *An estimate of reporting-year harvest volumes and associated carbon in harvested wood products.
12. *Estimated mill efficiency, as determined following the method in Appendix C, Section C.2.
13. The baseline carbon stock estimates for all required carbon pools for the reporting period, as determined following the requirements in Section 0 and approved at the time of the project's registration.
14. An estimate of Secondary Effects, following calculation steps and/or factors provided in Section 0 and approved at the time of the offset project listing.
15. The uncertainty discount for avoided conversion projects, as determined following the requirements of Section 6.3 and approved at offset project listing. (After the initial verification, the uncertainty discount does not change.)
16. A calculation of total net GHG reductions and GHG removal enhancements (QR_y) for the reporting period, following the requirements in Section 0.
17. If a reversal has occurred during the previous reporting period, the report must include a written description and explanation of the reversal, whether the reversal has been classified as intentional or unintentional, and the status of compensation for the reversal.
18. *The offset project's reversal risk rating, as determined following the requirements in Section 7 and Appendix D.
19. *A calculation of the offset project's Forest Buffer Account contribution.
20. For the initial Offset Project Data Report: Projections of baseline and actual harvesting volumes from the Project Area over 100 years.

9.2.2 Additional Reporting for Verification Years

Forest Projects must be verified at least every six years. If verification is less frequent than annual, Offset Project Data Reports must include the following additional information on aggregated GHG emission reductions or removal enhancements since the last verification:

1. Annual estimates of carbon stocks for all required carbon pools reported during each year since the last verification.
2. Confidence deduction for the forest carbon inventory applied for each year since the last verification for the project, if applicable.
3. Baseline carbon stock estimates for all required carbon pools reported during each year since the last verification.
4. Estimate of Secondary Effects reported during each year since the last verification.
5. If a reversal has occurred during the previous six years, the report must provide a written description and explanation of the reversal, whether the reversal has been classified as intentional or unintentional, and the status of compensation for the reversal.
6. Calculation of the offset project's Forest Buffer Account contribution for each year since the last verification.
7. Calculation of total net GHG reductions and GHG removal enhancements (QR_y) reported for each reporting period since the last verification.

9.3 Reporting and Verification Cycle

Upon completion of a reporting period, the Offset Project Operator or Authorized Project Designee must annually submit an Offset Project Data Report according to the schedule specified in the Regulation for each reporting period. Reporting periods are defined in the Regulation. Offset Project Data Reports must be verified (including a site visit) by an ARB-accredited verification body according to the schedule and requirements in the Regulation and Section 10.

A Forest Project is considered automatically terminated (see Section 3.4) if the Offset Project Operator or Authorized Project Designee chooses not to report data and undergo verification at required intervals.

Reforestation Projects for which an initial inventory is deferred are not eligible to receive ARB or registry offset credits until after the second verification.

10 Verification

10.1 Regulatory Verification Requirements

Offset Project Data Reports must be verified in accordance with the regulatory verification requirements in Subarticle 13 of the Regulation and this protocol. Failure to conform to any requirements in this protocol or the Regulation, as applicable, will result in an adverse verification statement. Forest Projects are not eligible to receive a qualified positive offset verification statement.

10.2 Additional Verification Requirements

In addition to the offset project verification requirements in the Regulation, verification of Offset Project Data Reports for Forest Projects must include the following:

10.2.1 Initial Verification

During the initial full verification, the following is required:

1. A detailed review of all required Listing Information during the initial verification.
    a. Include a thorough review of documentation and maps to verify the acreage of the Project Area enrolled in a Forest Project.

10.2.2 Full Verification

During every full verification, including the initial verification, the following is required of the offset verifier:

1. A detailed review of the forest carbon inventory, including:
    a. Inventory methodology and sampling design;
    b. Inventory update processes;
    c. Measurement of sample plots and sample plot locations;
    d. Lifetime and updating of sample plots, as applicable;
    e. Stratification methods, if applicable;
    f. Biomass equations and calculations;
    g. Incorporation of growth and harvest modeling and data;
    h. Documentation of inventory methods and procedures, including procedures for data quality assurance and quality control.
2. Identification and re-measurement of a selection of sample plots, along with a comparison with inventory data to have reasonable assurance that sample plots are measured accurately using the methods required in this section.

    The following paragraphs use specific terms that may not always have the same meanings in varying contexts. For the purposes of this verification the following terms and definitions apply:

- Stand: An individual unit or polygon that is relatively homogeneous in terms of the carbon stocking within its borders. For live and dead trees, the determination of stand boundaries is usually based on forest vegetation attributes, such as species, size (age), and density characteristics. For soils, the determination of soil stand boundaries is made on similar soil types.
- Stratum: A group of stands that contain a similar attribute, such as vegetation or soils attributes.
- Strata: Plural of stratum. The set of different groupings for a specific attribute, such as vegetation or soil.

The offset verifier will sample plots consistent with the objectives of a random, risk-based and efficient approach. In doing so, the offset verifier may weight the probability of selecting strata and plots based on appropriate criteria such as carbon stocking, access difficulty, and vegetation heterogeneity. Verifiers may choose to sample project plots within strata with a cluster design. The selection of a stratum may use probability proportional to carbon stocks or probability proportional to error risk.

The verification procedures described below must be applied independently for each applicable carbon pool/applicable combination of pools that is included in the Offset Project Boundary:

- Standing live and dead trees;
- Soil;
- Lying dead wood; and
- Shrubs and herbaceous understory.

Sequential statistical methods are used to minimize the verification effort when verification and project sample data agree. Sequential approaches have stopping rules rather than fixed sample sizes. With each successive plot, or series of plots, analyzed by the offset verifier, the stopping rules indicate to the offset verifier a) to continue to the next plot(s) since the results do not indicate either a bias or an agreement and further testing is required, b) stop as the testing indicates a bias, or c) stop as the testing indicates agreement. When a stopping rule is met then the result is evaluated. Verification of sample plots is successful after a minimum number of successive plots in a sequence indicate agreement. Where the stopping rules indicate the presence of a bias, additional verification plots may be collected after that time if it is felt that random chance may have caused the test to fail and a convergence towards agreement is expected with additional samples. For effective application of the sequential statistics in the field, the determination of when the stopping rule is met is determined at the end of each sampling day, which will include the full set of plots measured in that day.

Stands of a given stratum must be independently selected using a random selection design. Plots, or clusters, must be independently selected within a stand using a random or systematic design. No more than 6 plots or clusters can be assigned to a stand, unless the groups of plots required for verification exceed the number of stands that exist for the offset project. If the offset project is not stratified for each applicable pool, the offset verifier shall allocate the plots or clusters on a randomized basis. If the offset verifier uses a cluster design, the mean of the cluster accounts for one observation (plot). Plots may be measured and assessed one at a time or in reasonable batches that correspond to logistical realities such as crew-days of effort. Verification sampling may be conducted using clustering or systematic approaches to facilitate efficiency.

When the project area has been stratified for the purposes of estimating the Forest Project's inventory based on common characteristics for each carbon pool, the offset verifier shall select three strata for each applicable carbon pool based on the offset verifier's evaluation of risk. Consideration of risk should be based on the overall importance of a given stratum to the project's total stocks and the presumption that any given stratum is inaccurately measured. The selection of stands to verify within a given stratum must be random. The minimum number of sample plots varies by project size and number of strata verified. (Table 10.1).

Table 10.1. Minimum number of sample plots in sequence, as a function of project size.

Test	Number of Strata Verified	Project Acres				
		<100	100 - 500	501 - 5,000	5,000 - 10,000	> 10,000
Paired/Unpaired	3	2	3	4	5	6
	2	4	6	8	10	12
	1	8	12	16	20	24

There are two possible statistical procedures that can be applied to the stratum-level verifications. A paired test can be applied when plot locations can be found and it is statistically appropriate (i.e. plot measurements can be replicated) to use a paired test. An unpaired test can be applied when plots cannot be relocated. The range of acceptable error (δ, delta) is fixed at 10 percent.

Assigning Risk to Strata: The offset verifier must determine for each applicable pool or combination of pools if the Offset Project Operator or Authorized Project Designee has stratified the project area into strata that reflect common characteristics that influence carbon stocks. The offset verifier may presume risk exists in the highest stocked strata, strata that are unique or difficult to access due to topographical, vegetative, or other physical barrier, strata that represent a large portion of the project's inventory due to the area they represent, or any other risk perceived by the offset verifier. The determination of risk must be applied to the stratum as a unit and not individual stands of a given stratum.

Selecting Strata based on Risk: Based on the assessment of risk, the offset verifier will query, or request that the Offset Project Operator or Authorized Project Designee query, the set of stands that are associated with the strata selected. The queried stands must have an identifier which can be based on the Offset Project Operator or Authorized Project Designee's identification convention or one assigned by the offset verifier. Three strata must be selected, or the maximum number of strata stratified by the Offset Project Operator or Authorized Project Designee for each pool. Table 10.2 displays an example of ordered strata for standing live and dead trees selected by stratum with random numbers assignments.

Table 10.2. Stands selected by vegetation strata and risk class with random number assignments.

Stand Number	Stratum (from Forest Owner or Verifier)	Risk Class	Order of Random Selection
2	Dense Intermediate Conifers	High Stocking	5
3	Dense Intermediate Conifers	High Stocking	3
4	Dense Intermediate Conifers	High Stocking	1
8	Dense Intermediate Conifers	High Stocking	8
9	Dense Intermediate Conifers	High Stocking	2
10	Dense Intermediate Conifers	High Stocking	1
15	Dense Intermediate Conifers	High Stocking	4
18	Dense Intermediate Conifers	High Stocking	7
Stand Number	**Stratum (from Forest Owner or Verifier)**	**Risk Class**	**Order of Random Selection**
8	Dense Mature Conifers	High Stocking	4
9	Dense Mature Conifers	High Stocking	3
10	Dense Mature Conifers	High Stocking	5
15	Dense Mature Conifers	High Stocking	2
18	Dense Mature Conifers	High Stocking	1
Stand Number	**Stratum (from Forest Owner or Verifier)**	**Risk Class**	**Order of Random Selection**
13	Medium Dense Mature Riparian	Difficult Access	2
14	Medium Dense Mature Riparian	Difficult Access	1
17	Medium Dense Mature Riparian	Difficult Access	3

Planning and Implementing Field Verification Sampling: The selected stands shall be mapped and labeled with the random number to assist in developing a strategy to perform field sampling activities. Up to 6 plots or clusters may be re-measured in a stand (if plots are monumented) or installed (if plots are not monumented) in each stand. If the project area has not been stratified or there are less than 3 strata, the offset verifier shall locate the plots or clusters using a random process of their own design. For efficiency, it is acceptable for the offset verifier to relocate to a new area at the beginning of a day without having completed all the plots in the previous day.

Determination if the Stopping Rules have been met: The offset verifier must determine if the stopping rules have been met for each stratum after the measurement of each plot, unless the offset verifier determines it is appropriate to defer the determination until no later than the end of each day of sampling. The offset verifier must conduct the appropriate calculation for a paired or unpaired test. It is required that the offset verifier apply the random order selection in the sampling process. For efficiency purposes, the offset verifier may skip the random order on a temporal basis as long as the sequential analysis includes the ordered set of stands. This may provide significant efficiencies when selected stands and/or plots are in close geographic proximity and it is hypothesized that the stopping rules will require the full number of plots. An example is displayed in Table 10.3.

Table 10.3. The table displays a sampling schedule planned by the offset verifier and the verification results. In this example, the sequential sampling is conditionally satisfied

after Day 3 but requires the full set of randomly selected stands to be sampled up to the point of satisfying the sequential statistics, which is met after sampling Stand 3 on Day 4.

Stand	Stratum (from Forest Owner)	Risk Class	Order of Random Selection	Sampling Schedule (Planned)	Verification Effort	Verification Results
4	Dense Intermediate Conifers	High Stocking	1	Day 3	Day 1	Inconclusive. Stand 9 sampled. Sequential sampling criteria not satisfied - More plots are needed
9	Dense Intermediate Conifers	High Stocking	2	Day 1	Day 2	Inconclusive. Stand 15 sampled. Sequential sampling criteria not satisfied - More plots are needed
3	Dense Intermediate Conifers	High Stocking	3	Day 4	Day 3	Inconclusive. Stand 4 sampled. Sequential sampling criteria satisfied but stand order must be satisfied. Stand 3 must be sampled.
15	Dense Intermediate Conifers	High Stocking	4	Day 2	Day 4	Conclusive. Stand 3 sampled. Sequential sampling criteria is met and adherence to random selection is maintained
2	Dense Intermediate Conifers	High Stocking	5	Day 6	Further Verification Effort not Necessary	
10	Dense Intermediate Conifers	High Stocking	6	Day 5		
18	Dense Intermediate Conifers	High Stocking	7	Day 7		
8	Dense Intermediate Conifers	High Stocking	8	Day 8		

Paired Plots: The statistical test is based on a comparison of the offset verifier's measurements of plots within a selected stratum, calculated as CO_2-equivalent compared to the Offset Project Operator's or Authorized Project Designee's measurements of plots, which may include any adjustments for growth. The offset verifier must use α=0.05 and β=0.20 to control for error. The null hypothesis (H_0) is that the verification and project plots are equal.

1) Sample and measure at least the minimum number of plots required in Table 10.1.
2) If $n \geq ((Z_\alpha + Z_\beta)^2 \times S_n^2) / D^2$ then stop and evaluate. Otherwise take another sample.

   n = Number of verification plots measured,
   Z_α = α/2% N(0,1) = 1.645,
   Z_β = β/2% N(0,1) = 0.8416,
   S_n^2 = sample variance of the differences,
   D = δ × project average estimate.

3) If stopped, then evaluate.

   If $\bar{X}_N \leq K$ then accept H_0,
   If $\bar{X}_N > K$ then reject H_0.

   $\bar{X}_N$ = sample mean of the differences,
   N = total number of plots measured,

   $K = (Z_\alpha \times D) / (Z_\alpha + Z_\beta)$.

4) If H_0 was rejected then additional samples may be taken as long as the offset verifier is of the opinion that there is a chance that H_0 may be accepted based on the variability and trend observed.

Unpaired Plots: The statistical test is based on comparing the average CO_2-e estimates for each stratum from the verifier plots to the Offset Project Operator's or Authorized Project Designee's plots.

The offset verifier must use α=0.05 to control for error; the β is not specified because the method is constructing a confidence interval not a test. The null hypothesis (H_0) is that the verification and stratum averages are equal. The following procedure is appropriate for the unpaired test.

1) Sample and measure at least the minimum number of plots required in Table 10.1. Calculate n as the sum of the number of plots from both the stratum and the verification.
2) Calculate the following:

   $T_n = \bar{X}_P - \bar{X}_n$ where,
   $\bar{X}_P$ = stratum mean,
   $\bar{X}_n$ = verification mean after sample n.
   S_n^2 = sample variance of the verification plots,
   S_P^2 = sample variance of the stratum plots,
   D = δ × stratum average estimate.
   a = the percentile from a standard normal distribution for one half of alpha; is equal to 1.96 for α=0.05

3) If $n \geq (a^2/D^2) \times (S_n^2 + S_P^2)$ then stop and evaluate. (Note: $n = n = n_P + n_V$). Otherwise take another sample.
4) If stopped, then evaluate. Construct a confidence interval $T_n \pm D$.

   If the confidence interval includes zero then accept H_0,
   Otherwise reject H_0.

5) If H_0 was rejected then additional samples may be taken until as long as the verifier is of the opinion that there is a chance that H_0 may be accepted based on the variability and trend observed.

If the stopping rule in step (3) above cannot be attained within 100 plots then apply a standard unpaired t-test comparison using alpha of 0.05 and beta of 0.80.

3. Application of appropriate confidence deductions, if applicable.
4. Review reversal risk rating calculation.
5. Review of conformance with natural forest management and sustainable harvesting requirements.

10.2.3 Less-Intensive Verification

Less intensive verification refers to offset verification services that may be provided in interim years between full verifications. In the case of Forest Projects, full verification is required once every six years. Less intensive verification services may be provided in interim years between full verification at the discretion of the Offset Project Operator or Authorized Project Designee, subject to the concurrence of the accredited verification body that conducted the last full verification. Less intensive verification is not allowed if (1) there have been significant changes in methodologies or updates to the forest carbon inventory program, or (2) there has been a change in verification body since the previous verification.

Less intensive verification of an Offset Project Data Report only requires data checks and document reviews of an Offset Project Data Report based on the analysis and risk assessment in the most current sampling plan developed as part of the most recent full offset verification services. A site visit is not required. This level of verification may only be used if the verification team can provide findings with a reasonable level of assurance.

During less intensive verification of Forest Projects, the verification team must:

- Conduct data checks and carefully review data and calculations contained within the Offset Project Data Report, and
- At a minimum, review documentation supporting the data and calculations in the Offset Project Data Report, including the data used to update the forest carbon inventory and any new sample plot measurements, updates in growth and yield models, timber harvest plans and other regulatory documentation related to timber harvest, documentation of timber sales.

10.2.4 Verification of Multiple Reporting Years

If verification is less frequently than annual, the verification team must separately review and evaluate each reporting period of reported data specified in Section 9.2.2.

1. Each reporting period of quantified GHG reductions or GHG removal enhancements (QR_y) is separately evaluated for offset material misstatement.

10.2.5 Verification Team

Each verification team must include the following:

1. At least one Professional Forester that takes an active role in reviewing the forest carbon inventory program and conducting the site visit.
2. At least one individual with demonstrated competence in forest biometrics through:

   a. A master's degree in statistics or forest biometrics, or another closely related science that includes 12 semester or 16 quarter hours of forest biometrics, sampling design and/or statistics coursework; or
   b. University coursework that includes 12 semester or 16 quarter hours of forest biometrics, sampling design and/or statistics coursework, and at least two years of experience sampling, developing, implementing and analyzing forest biomass or carbon inventories
3. At least one individual with demonstrated knowledge of and competence in the use of forest growth and yield models, and demonstrated experience working with the model used in the forest carbon inventory being verified. Such experience should include university or other professional coursework, and/or project experience demonstrating competency in the use of the model.
4. An ARB-accredited Forest Offset Project Specialist.

An explanation demonstrating that the verification team includes individuals with the required experience and expertise must be included in the Notice of Verification Services submittal. The required experience and expertise may be demonstrated by a single individual, or by a combination of individuals.

10.2.6 Minimum Required Verification Schedule

Except as allowed for the second verification of Reforestation Projects, ARB requires that an ARB-accredited third-party verification body review and assess all reported data and information for a Forest Project and conduct a site visit at least once every six years. Verification is also required anytime new confidence deductions and/or reversal risk ratings are established. This requirement is consistent with Title 17, Cal. Code Regs. section 95977.1(b)(3)(D) and does not impose an additional visit requirement.

For Reforestation Projects, the second verification may be deferred up to 12 years at the discretion of the Offset Project Operator or Authorized Project Designee.

11 Glossary of Terms[8]

Above-Ground Live Biomass	The total mass of biomass in live trees including the stem, branches, and leaves or needles, brush and other woody live plants above ground.
Activity-Based Funding	The budget line items that are dedicated to agency accomplishments in vegetation management, including pre-commercial thinning, commercial thinning, harvest, hazard tree removal, hazardous fuel reductions, and other management activities designed to achieve forest sustainability health objectives.
Additional	Additional is defined in the Regulation. -Under this protocol, GHG reductions or removals from Forest Projects are demonstrated to be addition when they pass a legal requirement test and a performance test, as described in Section 3.1, and by achieving GHG reductions and removals quantified against an approved baseline, determined according to the requirements in Section 6.
Allometric Equation	An equation that utilizes the genotypical relationship among tree components to estimate characteristics of one tree component from another. Allometric equations allow the below ground root volume to be estimated using the above-ground bole volume.
Assessment Area	A distinct forest community within geographically identified ecoregions that consists of common regulatory and political boundaries that affect forest management. The size of an Assessment Area is determined by efforts to achieve optimal statistical confidence across multiple scales using U.S. Forest Service Forest Inventory and Analysis Program (FIA) plots for biomass. Maps of the Assessment Areas and the associated data may be found on ARB's website.
Avoided Conversion Project	A type of Forest Project consisting of specific actions that prevent the conversion of privately owned forestland to a non-forest land use by

[8] For terms not defined in this section, the definitions in the Regulation apply.

	dedicating the land to continuous forest cover through a conservation easement or transfer to public ownership.
Best Management Practices	Management practices determined by a state or designated planning agency to be the most effective and practicable means (including technological, economic, and institutional considerations) of controlling point and nonpoint source pollutants at levels compatible with environmental quality goals.
Biological Emissions	For the purposes of the Forest Offset Protocol, biological emissions are GHG emissions that are released directly from forest biomass, both live and dead, including forest soils. For Forest Projects, biological emissions are deemed to occur when the reported tonnage of onsite carbon stocks, relative to baseline levels, declines from one year to the next.
Biomass	Biomass is defined in the Regulation.
Bole	A trunk or main stem of a tree.
Broadcast Fertilization	A fertilizer application technique where fertilizer is spread across the soil surface.
Carbon Pool	A greenhouse gas reservoir.
Common Practice	The average stocks of the standing live carbon pool from within the Forest Project's Assessment Area, derived from FIA plots on all private lands within the defined Assessment Area.
Even-Aged Management	Management where the trees in individual forest stands have only small differences in their ages (a single age class). By convention, the spread of ages does not differ by more than 20 percent of the intended rotation.
FIA	USDA Forest Service Forest Inventory and Analysis program. FIA is managed by the Research and Development organization within the USDA Forest Service in cooperation with State and Private Forestry and National Forest Systems. FIA has been in operation under various names (Forest Survey, Forest Inventory and Analysis) for 70 years.
Forest Buffer Account	Forest Buffer Account is defined in the Regulation as a holding account for Forest Project ARB offset credits administered by ARB. It is used as a general insurance mechanism against unintentional reversals for all forest offset projects listed under a Compliance Offset

	Protocol.
Forest Management	The commercial or noncommercial growing and harvesting of forests.
Forest Owner	A Forest Owner is defined in the Regulation as the owner of any interest in the real (as opposed to personal) property involved in a forest offset project. Generally, a Forest Owner is the owner in fee of the real property involved in a forest offset project. In some cases, one entity may be the owner in fee while another entity may have an interest in the trees or the timber on the property, in which case all entities or individuals with interest in the real property are collectively considered the Forest Owners, however, a single Forest Owner must be identified as the Offset Project Operator.
Forest Project	A planned set of activities designed to increase removals of CO_2 from the atmosphere, or reduce or prevent emissions of CO_2 to the atmosphere, through increasing and/or conserving forest carbon stocks.
Forestland	Land that supports, or can support, at least 10 percent tree canopy cover and that allows for management of one or more forest resources, including timber, fish and wildlife, biodiversity, water quality, recreation, aesthetics and other public benefits.
GHG Removal Enhancement	GHG removal enhancement is defined in the Regulation. GHG removal enhancements are calculated as gains in carbon stocks over time relative to a Forest Project's baseline.
Greenhouse Gas (GHG) Reservoir	Greenhouse Gas Reservoir is defined in the Regulation. For Forest Projects, GHG reservoirs may include above-ground or below-ground biomass or harvested wood products, among others.
Improved Forest Management Project	A type of Forest Project involving management activities that increase carbon stocks on forested land relative to baseline levels of carbon stocks.
Listed	A Forest Project is considered "listed" when an the Offset Project Operator or Authorized Project Designee is registered with ARB or an approved offset project registry, submits all required documentation for project listing in the Regulation and this protocol, and the project has been approved by ARB or an approved offset project

	registry for listing.
Litter	Any piece(s) of dead woody material from a tree, e.g. dead boles, limbs, and large root masses, on the ground in forest stands that is smaller than material identified as lying dead wood.
Lying Dead Wood	Any piece(s) of dead woody material from a tree, e.g. dead boles, limbs, and large root masses, on the ground in forest stands. Lying dead wood is all dead tree material with a minimum average diameter of 5” and a minimum length of 8’. Anything not meeting the measurement criteria for lying dead wood will be considered litter. Stumps are not considered lying dead wood.
Metric ton (MT) or “ton”	A common international measurement for the quantity of GHG emissions, equivalent to about 2204.6 pounds or 1.1023 short tons.
Native Forest	For the purposes of this protocol native forests shall be defined as those occurring naturally in an area, as neither a direct nor indirect consequence of human activity post-dating European settlement.
Natural Forest Management	Forest management practices that promote and maintain native forests comprised of multiple ages and mixed native species at multiple landscape scales. The application of this definition, its principles, detailed definition, and implementation are discussed further in the Section 3.8.2.
Non-Forest Cover	Land with a tree canopy cover of less than 10 percent.
Non-Forest Land Use	An area managed for residential, commercial, or agricultural uses other than for the production of timber and other forest products, or for the maintenance of woody vegetation for such indirect benefits as protection of catchment areas, wildlife habitat, or recreation.
Non-Harvest Disturbance	Reduction in forest cover that is not a direct result of harvest, such as wildfire and insect disturbances.
Onsite Carbon Stocks	Carbon Stock as defined in the Regulation means “the quantity of carbon contained in an identified GHG reservoir.” For Forest Projects onsite carbon stocks include the carbon stocks in the required carbon pools indicated in Table A.1 within the Project Area.

Primary Effect	The Forest Project's intended changes in carbon stocks, GHG emissions, or GHG removals.
Professional Forester	A professional engaged in the science and profession of forestry. For forest projects that occur in a jurisdiction that has professional forester licensing laws and regulations, a Professional Forester must be credentialed in that jurisdiction. Where a jurisdiction does not have a professional forester law or regulation, then a Professional Forester is defined as either having the Certified Forester credentials managed by the Society of American Foresters, or other valid professional forester license or credential approved by a government agency in a different jurisdiction.
Project Area	The area inscribed by the geographic boundaries of a Forest Project, as defined following the requirements in Section 4 of this protocol. Also, the property associated with this area.
Project Life	Refers to the duration of a Forest Project and its associated monitoring and verification activities, as defined in Section 3.4.
Public Lands	Lands that are owned by a public governmental body such as a municipality, county, state, or country.
Qualified Conservation Easement	A qualified conservation easement must explicitly refer to the requirements of the regulation and this protocol and apply to current and all subsequent Forest Owners for the full duration of the Forest Project's minimum time commitment, as defined in Section 3.4 of this protocol.
Reforestation Project	A type of Forest Project involving the restoration of tree cover on land that currently has no, or minimal, tree cover.
Reversal	A reversal as defined in the Regulation. Under this protocol, a reversal is deemed to have occurred if the quantified GHG reductions and removal enhancements in a given year are negative and offset credits were issued to the Forest Project in any previous year, regardless of the cause of the decrease.
Secondary Effects	Unintended changes in carbon stocks, GHG emissions, or GHG removals caused by the Forest Project.
Significant Disturbance	Any natural impact that results in a loss of at least 20 percent of the above-ground live

	biomass that is not the result of intentional or grossly negligent acts of the Forest Owner.
Standing Dead Carbon Stocks	The carbon in standing dead trees. Standing dead trees include the stem, branches, roots, or section thereof, regardless of species, with a minimum diameter at breast height of five inches and a minimum height of 15 feet. Stumps are not considered standing dead stocks.
Standing Live Carbon Stocks	The carbon in the live tree biomass. Live trees include the stem, branches, roots, and leaves or needles of all live biomass, regardless of species, with a minimum diameter at breast height of five inches and a minimum height of 15 feet.
Stocks (or Carbon Stocks)	The quantity of carbon contained in an identified GHG reservoir (or carbon pool).
Submitted	A Forest Project is “submitted” when all of the appropriate forms have been uploaded and submitted.
Tree	A woody perennial plant, typically large and with a well-defined stem or stems carrying a more or less definite crown with the capacity to attain a minimum diameter at breast height of 5 inches and a minimum height of 15 feet with no branches within 3 feet from the ground at maturity.
Unintentional Reversal	An unintentional reversal as defined in the Regulation is any reversal not due to the Forest Owner’s negligence, gross negligence or willful intent, including wildfires or disease that are not the result of the Forest Owner's negligence, gross negligence or willful intent.
Uneven-Aged Management	Management that leads to forest stand conditions where the trees differ markedly in their ages, with trees of three or more distinct age classes either mixed or in small groups.

Appendix A Developing an Inventory of Forest Project Carbon Stocks

Quantification Methodology

This appendix provides requirements for quantifying a Forest Project's forest carbon stocks. It explains how to identify the required forest carbon pools measured in a Forest Project, as well as the steps necessary for quantifying the existing carbon stocks in the selected pools within the Project Area. Carbon inventory information serves two purposes:

1. It is used as the basis for modeling and estimating carbon stocks in a Forest Project's baseline (following the requirements of Section 0).
2. It is used to quantify actual carbon stocks during the course of a project.

This appendix explains the essential steps and requirements for completing a carbon inventory for all required onsite carbon pools associated with a Forest Project.

A.1 Provide Background Information on Forest Area

To begin the inventory process, develop a general description of the activities and land use patterns that influence carbon stocks in the Project Area, including all the information required in Section 9.1.1.1. This information will help inform the initial design of the forest inventory, as well as the estimations of carbon stocks. This information will be reviewed during verification.

A.2 Measure Carbon Pools in the Project Area

Forest carbon pools are broadly grouped into the following categories:

1. Living biomass
2. Onsite dead biomass
3. Soil

Values for some of these categories of carbon will be determined through direct sampling. Table A.1 indicates the categories with their associated carbon pools and identifies which pools must be quantified for all offset projects versus those are excluded depending on the project. It also shows how the value for the pool is determined.

Table A.1. Requirements of carbon pool categories and determination of value for pool

Category	Carbon Pool	Improved Forest Management	Reforestation	Avoided Conversion	Determination of Value
Living biomass	Standing Live	Required	Required*	Required	Sampled in Project
	Shrubs and Herbaceous Understory	Excluded	Required	Excluded	Sampled in Project
Onsite dead biomass	Standing Dead	Required	Required	Required	Sampled in Project
Soil	Soil**	Required/ Excluded**	Required/ Excluded**	Required/ Excluded**	Sampled in project

* Pre-existing trees must be distinguished from planted trees. Since pre-existing and new trees are easy to distinguish for several decades after tree planting, pre-existing trees do not need to be inventoried until the offset project first seeks verification of GHG reductions and GHG removal enhancements.
** Soil carbon is not anticipated to change significantly as a result of most Forest Project activities. Soil carbon is excluded except when specified in Section 5.

A.3 Developing Onsite Forest Carbon Inventories

To develop estimates of carbon stocks in the carbon pools identified in Table A.1, a forest inventory must first be conducted. Standard forest inventories require the establishment of sample plots and provide inventory estimates in terms of cubic or board foot volume. These measurements are based on the species, trunk or bole diameter, form and height of the tree.

Each Offset Project Operator or Authorized Project Designee must develop and document a forest carbon inventory methodology. The inventory method must be capable of quantifying carbon stocks for required carbon pools to a high degree of accuracy. A complete inventory methodology must include:

1. A description of the Offset Project Boundary, including a list of all carbon pools included in the Offset Project Boundary.
2. For each carbon pool, include a detailed description of the inventory sampling methodology used to quantify that carbon pool, with references clearly documented. This documentation must include:
    a. Standard procedures for the collecting of field measurements. These procedures must be detailed enough so that any qualified forester would be able to accurately repeat the previous measurements. These procedures must include a description of the types of sample plots, location of plots, and frequency for updating or replacing sample plots as well as the forest carbon inventory as a whole;
    b. Standard procedures for where and how to measure parameters used in biomass calculations such as dbh and height (including for irregular trees), how to classify dead wood, and for any other aspects of sampling where a consistent method needs to be documented; and
    c. Stratification rules (pre and post sampling), if applicable, that include a map of vegetation strata, results of stratification (area by strata), tools for application

(such as GIS, aerial photos), and a discussion of how boundaries were determined.

3. Documentation of all analytic methods and biomass equations used to translate field measurements into volume or biomass carbon estimates;
4. A documented quality assurance / quality control (QA/QC) plan including procedures for internal review to ensure that standard operating procedures are being followed. The QA/QC plan must include procedures for assessing and ensuring the quality of collection, transfer and archiving of field data; procedures for data entry and analysis, and data maintenance and archiving; and any other relevant procedures to ensure quality and consistency in the collection and maintenance of data used to compile the offset project data reports.
5. Description of data management systems and processes, including the collection, storage and analysis of inventory related data analytical methods to translate field measurements into volume and/or biomass estimates.
6. A change log documenting any changes in the inventory methods or equations used to calculate carbon stocks.
7. Standard procedures for updating the forest carbon inventory, including documented procedures to account for:
    a. Harvest;
    b. Growth;
    c. Disturbance;
    d. Incorporating new inventory and plot data, and retiring older sample plots;
    e. Modeling, as allowed under Appendix B; and
    f. Application of appropriate confidence deduction.

Inventory methods and sampling procedures, once established, must be consistent over the life of the project. Any changes to inventory methods or calculations must be documented and justified in the change log.

Allometric Equations and Biomass/Carbon Mass Estimates

The equations in this appendix and in the Forest Offset Protocol Resources section of ARB's webpage must be used for biomass and carbon mass estimations using the bole diameter and total height for live trees and sound standing dead trees. Estimates of standing dead tree (for non-sound trees) biomass must be computed in terms of cubic volume and subsequently converted to biomass/carbon mass estimates.

Sample Plots

Any plot data used for deriving the forest carbon inventory estimates must have been sampled within the last 12 years. The scheduling of plot sampling may occur in one time period or be distributed over several time periods. Either approach is acceptable so long as an inventory of the entire Project Area (its required carbon pools and corresponding sample plots) is completed within 12-year intervals.

Steps for Developing a Complete Forest Carbon Inventory

The steps that follow provide more detail on establishing and maintaining a complete inventory and estimating carbon stocks. Results must be summarized in a table when submitting required data in an Offset Project Data Report (see Section 9).

Step 1 – Developing Inventory Methodology and Sample Plots

The Offset Project Operator or Authorized Project Designee must develop and describe a methodology to sample for biomass or volume of all required carbon pools. If a pre-existing forest inventory is used to develop a forest carbon inventory, all steps here must be followed to ensure the existing inventory meets the requirements of this protocol.

Sampling methodology and measurement standards should be consistent throughout the duration of the Forest Project. If new methodologies are adopted, they must achieve an equal or greater accuracy relative to the original sampling design. All sampling methodologies and measurement standards must be statistically sound and must be approved during verification.

Stratification is not required, but it may simplify verification. Temporary flagging of plot center, as is customary to allow for check cruising, is required to ensure ongoing inventory quality and allow for offset verifiers to visit plots when verifying inventory procedures. If permanent plots are used, which are statistically efficient for stock change estimates, permanent plot monumenting must be sufficient for relocation. Plot centers should be referenced on maps, preferably with GPS coordinates. The methodologies utilized must be documented and made available for verification and public review. The design of the sampling methodology and measurement standards must incorporate the requirements in the following table. All tree species within the Project Area must be measured regardless of the merchantability of the trees.

Table A.2. Minimum required sampling criteria for estimated pools

Carbon Pool	Name of Requirement	Description of Requirement
Standing Live Carbon Stocks (above-ground portion)	Diameter (breast height) Measurements	The minimum diameter (at breast height) must be stated in the methodology, and this minimum diameter must not be greater than 5 inches (inventory must include all trees 5 inches and greater in diameter). Height must be measured as required in appropriate biomass equations.
	Measurement Tools	Description of tools used for height measurement, diameter measurement, and plot measurement.
	Measurement Standards	The methodology shall include a set of standards for tree and plot size measurements.
	Plot Layout	A description of plot layout.
	Merchantability of Trees	The methodology shall include all trees regardless of current merchantability to be included in the sampling design.
	Allometric Equation used for Estimating Biomass	The methodology must include a description of the allometric equation used to estimate the whole tree biomass (bole, branches, and leaves) from bole diameter measurements. The use of functions other than those provided in the protocol will need to be approved by ARB and the verification body.
Standing Live Carbon Stocks (below-ground portion)	Plot-level Allometric Equation used for Estimating Biomass	Apply model (Cairns, Brown, Helmer, & Baumgardner, 1997) to estimate below-ground biomass density. This model equation is based on above-ground biomass density in tons per hectare. The use of a function other than that provided in the protocol will need to be approved by ARB and the verification body.
Herbaceous Understory	Sampling Methodology	The sampling methodology prepared by Brown, Shoch, Pearson, & Delaney (2004). Alternative methodologies need to be reviewed and approved by ARB and the verification body.
Standing Dead Trees	Diameter (breast height) and top Diameter Measurements	The minimum diameter (at breast height) must be stated in the methodology, and this diameter must not be greater than 5 inches. The minimum height of standing dead trees is 15'. The method must include how volume is derived where a total height does not exist (i.e. where the tree is broken).
	Measurement Tools	Description of tools used for height, diameter and plot measurement.
	Measurement Standards	The methodology shall include a set of standards for height and diameter measurements.
	Plot Layout	A description of plot layout (may be the same layout as for live tree biomass).
	Merchantability of Trees	The methodology shall include all trees regardless of current merchantability to be including in the sampling design.

Step 2 – Estimating Carbon in Live Trees from Sample Plots

Standing live tree carbon estimates are required for all offset projects. The standing live tree estimate includes carbon in all portions of the tree, including the bole, stump, bark, branches, leaves, and roots. The Offset Project Operator or Authorized Project Designee is responsible for determining appropriate methodologies for sampling to determine standing live tree carbon stocks. The estimate of above-ground live tree biomass must be combined with the estimates of biomass from other carbon pools to determine a mean estimate of the included pools derived from sampling, along with a summary that describes the statistical confidence of the estimate.

All biomass estimates must be converted to carbon estimates. The derived estimate of biomass must be multiplied by 0.5 to calculate the mass (kg) in carbon. This product must be multiplied by 0.001 tons/kg to convert the mass to metric tons of carbon.

Approved biomass equations will be available in the Forest Offset Protocol Resources section of ARB's website.

Step 3 – Estimating Carbon Standing Dead Tree Carbon from Sample Plots

An inventory of carbon stocks in standing dead tree carbon is required for all Forest Projects. The Offset Project Operator or Authorized Project Designee must provide a sampling methodology for standing dead tree carbon as part of an overall sampling strategy (discussed in Step 1). Sound dead trees can be computed using the equations provided for standing live carbon in Step 2. The estimate of standing dead tree carbon for highly decayed trees (broken tops, missing branches, etc.), must be calculated first volumetrically and subsequently converted to biomass and carbon tons.

For those trees where volume is computed, the volume will need to be converted to biomass density by applying conversion factors based on decay class. The methodology developed must include a description of the calculation techniques used to determine biomass density by decay class. The estimate of biomass density must be computed in terms of metric tons of carbon on a per acre basis. The density factors by decay class from Harmon et al (2008) may be used to estimate density in standing dead carbon stocks.

Step 4– Estimate Carbon in Shrubs and Herbaceous Understory from Sample Plots

Any methodology developed for measuring carbon in shrubs must be reviewed during verification. The most applicable biomass estimation methods may be used, including photo series, the estimation functions from published papers, direct sampling, or combinations of approaches.

Step 5 – Estimate of Carbon Tons in Soil

Changes in total soil carbon are a challenge to measure over short timeframes, as this pool changes slowly and is usually dependent on the rate of biomass input relative to soil decomposition. The sampling methodology and protocols for deriving carbon estimates in soil must be developed as part of an overall sampling strategy (discussed in Step 2). Use the soil sampling methodology prepared by Brown, Shoch, Pearson, & Delaney (2004).

Step 6 – Sum Carbon Pools

The metric tons of carbon in each carbon pool, as derived from the preceding steps, must be entered in the following table. For the purpose of quantifying GHG reductions and GHG removal enhancements, all numbers must be converted to metric tons of CO_2-equivalent by multiplying by 3.664.

Table A.3. Summarizing Carbon Pools and Calculating Total Carbon

Carbon Pool	Source	Gross CO_2-equivalent Tons per Acre
Step 2 Live Carbon Stocks	From sampling results of trees.	
Steps 3 Standing Dead Carbon Stocks	From sampling results of standing dead biomass.	
Step 4 Shrubs and Herbaceous Understory	From sampling results of shrubs and herbaceous understory.	
Step 5 Soil	From sampling results of soil.	
Sum of CO_2-equivalent Tons from Required Pools		

A.4 Applying a Confidence Deduction

Any forest carbon inventory estimate will be subject to statistical uncertainty. Where statistical confidence is low, there is a higher risk of overestimating a project's actual carbon stocks and therefore a higher risk of over-quantifying GHG reductions and GHG removal enhancements. To help ensure that estimates of GHG reductions and GHG removal enhancements are conservative, a confidence deduction must be applied each year to the inventory of actual onsite carbon stocks. A confidence deduction is *not* applied to the forest carbon inventory when it is used to model baseline carbon stocks.

To determine the appropriate confidence deduction, perform the following:

1. Compute the standard error of the inventory estimate (based on the carbon in all carbon pools included in the forest carbon inventory).
2. Multiply the standard error by 1.645.
3. Divide the result in (2) by the total inventory estimate and multiply by 100. This establishes the sampling error (expressed as a percentage of the mean inventory estimate from field sampling) for a 90 percent confidence interval.
4. Consult Table A.5 to identify the percent confidence deduction that must be applied to the inventory estimate for the purpose of calculating GHG reductions and removals (i.e. variable CD_y in Equation 6.1 in Section 0).

Table A.4. Forest carbon inventory confidence deductions based on level of confidence in the estimate derived from field sampling.

Sampling Error (% of Inventory Estimate)	Confidence Deduction
0 to 5%	0%
5.1 to 19.9%	(Sampling Error – 5.0%) to the nearest 1/10th percentage
20% or greater	100%

The confidence deduction must be updated each time the offset project is subject to verification, but must remain unchanged between verifications. If increased sampling over time results in a

lower confidence deduction at the time of verification, the lower deduction must be applied to inventory estimates in the most recent reporting period subject to verification at that time. ARB or registry offset credits may be issued in the most recent reporting period for any verified increase in quantified GHG reductions and GHG removal enhancements associated with the new (lower) confidence deduction. Conversely, if a loss of qualified sampling plots results in a higher confidence deduction, this higher deduction is applied to the inventory estimates in the most recent reporting period subject to verification at that time. Any resulting decrease in quantified GHG reductions and GHG removal enhancements from prior years as a result of the increased confidence deduction will be treated as an intentional reversal, and must be compensated pursuant to the Regulation.

Appendix B Modeling Carbon Stocks

Quantification Methodology

This protocol requires the use of certain empirical-based models to estimate the baseline carbon stocks and project stocks of selected carbon pools within the Project Area. These models may also be used to supplement assessments of actual changes in carbon stocks resulting from the Forest Project.

B.1 About Models and Their Eligibility for Use with Forest Projects

Empirical-based models are used for estimating existing values where direct sampling is not possible or cost-effective. They are also used to forecast the estimations derived from direct sampling into the future. Field measurements provide the basis for inferring value through the use of these models.

The models that simulate growth projections have two basic functions in the development and management of a forest project. Models project the results of direct sampling through simulated forest management activity. These models, often referred to as growth and yield simulation models, may project information regarding tree growth, harvesting, and mortality over time – values that must ultimately be converted into carbon in an additional step. Other models may combine steps and estimate tree growth and mortality, as well as changes in other carbon pools and conversions to carbon, to create estimated projections of carbon stocks over time.

Models are also used to assist in updating inventory plots so that the plots can represent a reporting year subsequent to their actual sample date. The model simulates the diameter and height increment of sampled trees for the length of time between their sampled date and the reporting year. The limit to the use of models for updating plot data is described in Appendix A.

The following growth models have been approved:

- CACTOS: California Conifer Timber Output Simulator
- CRYPTOS: Cooperative Redwood Yield and Timber Output Simulator
- FVS: Forest Vegetation Simulator
- SPS: Stand Projection System
- FPS: Forest Projection System
- FREIGHTS: Forest Resource Inventory, Growth, and Harvest Tracking System
- CRYPTOS Emulator
- FORESEE

Inventory plot data may be updated for estimating diameter and height growth by incorporating data obtained from sample plots, as in a stand table projection. To qualify for this method:

- The Project Area shall be stratified into even-age management and uneven-age management.
- Diameter increment shall be based on the average annual increment of a minimum of 20 samples of radial growth for diameter increment for each 8” DBH (diameter at breast height) class, beginning at 0 – 8” DBH for each management (even-age or uneven-age) type. The average annual increment shall be added for each year according to the plot’s sample date.
- Height increment shall be based on regression curves for each management type (even-age or uneven-age) developed from height measurements from the same trees the

diameter increment data was obtained. The estimated height shall be determined using the regression estimators for the 'grown' diameters as described above.

Additional models will be allowed following approval of a state forestry authority (i.e. a state agency responsible for oversight of forests) who will acknowledge in writing that the model:

- Has been peer reviewed in a process that: 1) primarily involved reviewers with necessary technical expertise (e.g. modeling specialists in relevant fields of biology, forestry, ecology, etc.), and 2) was open and rigorous
- Is parameterized for the specific conditions of the Project Area
- Limits use to the scope for which the model was developed and evaluated
- Is clearly documented with respect to the scope of the model, assumptions, known limitations, embedded hypotheses, assessment of uncertainties, and sources for equations, data sets, factors or parameters, etc.
- Underwent a sensitivity analysis to assess model behavior for the range of parameters for which the model is applied
- Is reviewed at least every 10 years

B.2 Using models to forecast carbon stocks

The use of simulation models is required for estimating a Forest Project's baseline carbon stocks. Models may also be required to forecast actual carbon stocks expected under the Forest Project (e.g. in conjunction with determining expected harvesting volumes or in updating forest carbon inventories).

Inventory information from Appendix A must be incorporated into the simulation models to project carbon stocks over time. If a model has the ability to convert biomass to carbon, it must include all the carbon pools required by this protocol.

Projected baseline or actual carbon stocks must be portrayed in a graph depicting time in the x-axis and carbon tons in the y-axis. Baseline carbon stocks must be projected forward from the date of the Forest Project's offset project commencement. The graph should be supported with written characterizations that explain any annual changes in baseline carbon stocks over time. These characterizations must be consistent with the baseline analysis required in Section 0.

B.3 Modeling Requirements

A modeling plan must be prepared that addresses all required forecasting or updating of baseline and actual carbon stocks for the Forest Project. The modeling plan shall contain the following elements:

1. A description of all silviculture methods modeled. The description of each silviculture method will include:
    a. A description of the trees retained (by species groups if appropriate) at harvest.
    b. The harvest frequency (years between harvests).
    c. Regeneration assumptions.
2. A list of all legal constraints that affect management activities on the Project Area. This list must identify and describe the constraint and discuss the silviculture methods that will be modeled to ensure the constraint is respected.
3. A description of the site indexes used for each species and an explanation of the source of the site index values used.
4. A description of the model used and an explanation of how the model was calibrated for local use, if applicable.

Modeling outputs must include:

1. Periodic harvest, inventory, and growth estimates for the entire Project Area presented as total carbon tons and carbon tons per acre.
2. Harvest yield streams on modeled stands, averaged by silviculture method and constraints, which must include the period over which the harvest occurred and the estimated volume of wood removed.

Appendix C Estimating Carbon in Wood Products

Quantification Methodology

Wood products may constitute a reservoir for storing carbon over the long term. Projects that increase wood product production can receive credit for the resulting incremental carbon storage. By the same token, projects that reduce wood product production must account for the incremental *reduction* in stored wood product carbon. As indicated in Section 7, GHG reductions and GHG removal enhancements must be effectively "permanent," meaning that sequestered carbon associated with GHG reductions and removals must remain stored for at least 100 years. Wood product carbon is estimated by calculating the average amount of carbon that is likely to remain stored in wood products over a 100-year period.

The processes described here are adapted from the 1605(b) methodology (U.S. Department of Energy, 2007) for accounting for the long-term storage of wood products. Please see Smith, Heath, Skog, & Birdsey (2006) for a more detailed description since the 1605(b) procedure was adapted from this publication.

Because of the significant uncertainties associated with predicting wood product carbon storage over 100 years, the accounting requirements in this appendix are designed to err on the side of conservativeness. This means the calculations are designed to reduce the risk of overestimating the GHG reductions and GHG removal enhancements achieved by a Forest Project. One of the largest sources of uncertainty is predicting the amount of wood product carbon likely to be stored in landfills. To accommodate this uncertainty, and ensure that Forest Project GHG reductions and GHG removal enhancements are accounted for conservatively:

1. Landfill carbon storage is *excluded* from calculations of wood-product carbon in years where a Forest Project's actual harvesting volumes exceed estimated baseline harvesting volumes, as determined in Section 6.
2. Landfill carbon storage is *included* in calculations of wood-product carbon in years where a Forest Project's actual harvesting volumes are below estimated baseline harvesting volumes, as determined in Section 6.

Accounting for wood product carbon must be applied only to actual or baseline volumes of wood harvested from within the Project Area. Trees harvested outside of the Project Area are not part of the Forest Project and must be excluded from any calculations.

There are five steps required to determine carbon stored in wood products:

1. Determining the amount of carbon in harvested wood that is delivered to mills.
2. Accounting for mill efficiencies.
3. Estimating average carbon storage over 100 years in in-use wood products.
4. Estimating average carbon storage over 100 years in wood products in landfills (when applicable).
5. Summing the results to determine total average carbon storage over 100 years.

C.1 Determine the Amount of Carbon in Harvested Wood Delivered to Mills

The following steps must be followed to determine the amount of carbon in harvested wood:

1. Determine the amount of wood harvested (actual or baseline) that will be delivered to mills, by volume (cubic feet) or by green weight (lbs.), and by species for the current year (y). In all cases, harvested wood volumes and/or weights must exclude bark.

   a. Baseline harvested wood volumes and species are derived from modeling a baseline harvesting scenario, following the requirements in Section 6.
   b. Actual harvested wood volumes and species must be based on verified third-party scaling reports, where available. Where not available, documentation must be provided to support the quantity of wood volume harvested.
2. If a volume measurement is used, multiply the cubic foot volume by the appropriate wood density factor in Table C.1 (for projects located in the Pacific Southwest) or from the USFS Wood Handbook (other regions).[9] This results in pounds of biomass with zero moisture content.
3. If a weight measurement is used, subtract the water weight based on the moisture content of the wood. This results in pounds of biomass with zero moisture content.
4. Sum the dry weights for each harvested species to get a total dry weight for all harvested wood.
5. Multiply this total value by 0.5 pounds of carbon/pound of wood to compute the total carbon weight.
6. Divide the total carbon weight by 2,204.6 pounds/metric ton to convert to metric tons of carbon. This value is used in the next step, accounting for mill efficiencies.

Table C.1. Specific gravity and Wood Density of green softwoods and hardwoods by forest type for the Pacific Southwest from Table 1.4.

Forest Type	Specific Gravity of Softwoods	Specific Gravity of Hardwoods	Wood Density of Softwoods (lbs/ft^3)	Wood Density of Hardwoods (lbs/ft^3)
Mixed conifer	0.394	0.521	24.59	32.51
Douglas-fir	0.429	0.483	26.77	30.14
Fir-spruce-hemlock	0.372	0.510	23.21	31.82
Ponderosa pine	0.380	0.510	23.71	31.82
Redwood	0.376	0.449	23.46	28.02

C.2 Account for Mill Efficiencies

Multiply the total carbon weight (metric tons of carbon) derived in C.1 by the mill efficiency identified for the project's Assessment Area in the Forest Offset Protocol Resources section of ARB's website. This is the total carbon transferred into wood products. The remainder of the harvested carbon is considered to be immediately emitted to the atmosphere for accounting purposes in this protocol.

C.3 Estimate the Average Carbon Storage Over 100 Years in In-Use Wood Products

The amount of carbon that will remain stored in in-use wood products for at least 100 years depends on the rate at which wood products either decay or are sent to landfills. Decay rates depend on the type of wood product that is produced. Thus, in order to account for the

[9] The Wood Handbook (USFS, 2010) contains specific gravities for tree species in other regions. Multiply the specific gravity by the density of water (62.43 lbs/ft^3) to get wood density.

decomposition of harvested wood over time, a decay rate is applied to wood products according to their product class. To approximate the climate benefits of carbon storage, this protocol accounts for the average amount of carbon stored over 100 years. Thus, decay rates for each wood product class have been converted into “average storage factors” in

Table C.2, below.

To determine the average carbon storage in in-use wood products over 100 years, the first step is to determine what percentage of a Project Area's harvest will end up in each wood product class (Columns A-G in

Table C.2). This must be done by either:

1. Obtaining a verified report from the mill(s) where the Project Area's logs are sold indicating the product categories the mill(s) sold for the year in question; or
2. 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 Forest Offset Protocol Resources section of ARB's website.

If breakdowns for wood product classes are not available from either of these sources, classify all wood products as "miscellaneous."

Once the breakdown of in-use wood product categories is determined, use the worksheet in

Table C.2 to estimate the average amount of carbon stored in in-use wood products over 100 years:

1. Assign a percentage to each product class (columns A-G) according to mill data or default values for the project.
2. Multiply the total carbon transferred into wood products (determined in Section C.2) by the percentages in each column and insert the resulting values into boxes 3A through 3G.
3. Multiply the values in 3A-3G by the 100-year average storage factor and insert the results into boxes 4A through 4G.
4. Use Equation C.1 to calculate the average carbon stored in in-use wood products over 100 years (in units of CO_2-equivalent metric tons).

Equation C.1. Average Carbon Stored in In-Use Wood Products

$$\mathbf{WP_{in\text{-}use,\,y} = \sum(\text{Table C.2, Row 4}) \times 3.67}$$

Where,

$WP_{in\text{-}use,\,y}$ = Average carbon stored in in-use wood products over 100 years from wood harvested in year y (actual or baseline)

Table C.2. Worksheet to Estimate Long-Term Carbon Storage In In-Use Wood Products

	A	B	C	D	E	F	G
Wood Product Class	Softwood Lumber	Hardwood lumber	Softwood Plywood	Oriented Strandboard	Non Structural Panels	Miscellaneous Products	Paper
% in each class	(X%)	(X%)	(X%)	(X%)	(X%)	(X%)	(X%)
Metric tons C in each class	(3A)	(3B)	(3C)	(3D)	(3E)	(3F)	(3G)
100-year average storage factor (in-use)	0.463	0.250	0.484	0.582	0.380	0.176	0.058
Average C stored in in-use wood products (metric tons)	(4A)	(4B)	(4C)	(4D)	(4E)	(4F)	(4G)

C.4 Estimate the Average Carbon Storage Over 100 Years for Wood Products in Landfills

Wood product carbon in landfills is only calculated for years in which a Forest Project's actual harvesting volumes are below estimated baseline harvesting levels, as determined in Section 6. To determine the appropriate value for average landfill carbon storage, perform the following steps:

Step 1 – Calculate the average carbon storage over 100 years for wood products in landfills

Use the worksheet in

Table C.3 to estimate the average amount of wood product carbon stored in landfills over 100 years:

1. Assign a percentage to each product class (columns A-G) according to mill data or default values for the project (as determined in Section C.3).
2. Multiply the total carbon transferred into wood products (determined in Section C.2) by the percentages in each column and insert the resulting values into boxes 3A through 3G.
3. Multiply the values in 3A-3G by the 100-year average storage factor for landfill carbon and insert the results into boxes 4A through 4G.

Table C.3. Worksheet to Estimate Long-Term Carbon Storage in Wood Products in Landfills

	A	B	C	D	E	F	G
Wood Product Class	Softwood Lumber	Hardwood lumber	Softwood Plywood	Oriented Strandboard	Non Structural Panels	Miscellaneous Products	Paper
% in each class	(X%)	(X%)	(X%)	(X%)	(X%)	(X%)	(X%)
Metric tons C in each class	(3A)	(3B)	(3C)	(3D)	(3E)	(3F)	(3G)
100-year average storage factor (landfills)	0.298	0.414	0.287	0.233	0.344	0.454	0.178
Average C stored in landfills (metric tons)	(4A)	(4B)	(4C)	(4D)	(4E)	(4F)	(4G)

Step 2 – Determine the appropriate value to use for wood product carbon in landfills

Use Equation C.2. Average Wood Product Carbon Stored in Landfills to determine the appropriate value for the average wood product carbon stored in landfills over 100 years (in units of CO_2-equivalent metric tons).

Equation C.2. Average Wood Product Carbon Stored in Landfills

$$If \sum_{n=1}^{y}(AC_{hv,n} - BC_{hv,n}) < 0, then\, WP_{landfill,y} = \sum(Table\ \mathrm{C.3}, Row\ 4) \times 3.67$$

$$If \sum_{n=1}^{y}(AC_{hv,n} - BC_{hv,n}) > 0, then\ \ WP_{landfill,y} = 0$$

Where,

$WP_{landfill,\,y}$ = Average carbon stored in wood products in landfills over 100 years from wood harvested in the current year/reporting period (actual or baseline)

$AC_{hv,\,n}$ = Actual amount of onsite carbon harvested in reporting period n (prior to delivery to a mill), expressed in CO_2-equivalent tons

$BC_{hv,\,n}$ = Estimated average baseline amount of onsite carbon harvested in reporting period n (prior to delivery to a mill), expressed in CO_2-equivalent tons

y = The current year or reporting period

C.5 Determine Total Average Carbon Storage in Wood Products Over 100 Years

The total average carbon storage in wood products over 100 years for a given harvest volume (as determined in Section C.1) must be calculated and reported as follows (Equation C.3). The value derived for WP_{total} must be used for actual and baseline wood product carbon estimates ($AC_{wp,y}$ or $BC_{wp,y}$ in Equation 6.1) as appropriate, following the guidance in Section 6.

Equation C.3.

$$\mathbf{WP_{total,\,y} = WP_{in\text{-}use,\,y} + WP_{landfill,\,y}}$$

Where,

$WP_{total,\,y}$	=	Average carbon stored over 100 years from wood harvested in year y (actual or baseline)
$WP_{\mathbf{in\text{-}use,\,y}}$	=	Average carbon stored in in-use wood products over 100 years from wood harvested in year y (actual or baseline)
$WP_{\mathbf{landfill,\,y}}$	=	Average carbon stored in wood products in landfills over 100 years from wood harvested in year y (actual or baseline)

Appendix D Determination of a Forest Project's Reversal Risk Rating

A reversal risk rating must be determined for the Forest Project using the worksheets in this section. The worksheets are designed to identify and quantify the specific types of risks that may lead to a reversal, based on project-specific factors.

This risk assessment must be updated every time the Forest Project undergoes a verification site visit. Therefore, a Forest Project's risk profile and its assessment are dynamic. If estimated risk values and associated mitigation measures are updated as improvements in quantifying risks or changes in risks are determined, any adjustments to the risk ratings will affect only current and future year contributions to the Forest Buffer Account.

Risks that may lead to reversals are classified into the categories identified in Table D.1.

Table D.1. Forest Project Risk Types

Risk Category	Risk Type	Description	How managed in this protocol
Financial	Financial Failure Leading to Bankruptcy	Financial failure can lead to bankruptcy and/or alternative management decisions to generate income that result in reversals through over-harvesting or conversion	Default Risk
Management	Illegal Harvesting	Loss of project stocks due to timber theft	Default by Area
	Conversion to Non-Forest Uses	Alternative land uses are exercised at project carbon expense	Default Risk
	Over-Harvesting	Exercising timber value at expense of project carbon	Default Risk
Social	Social Risks	Changing government policies, regulations, and general economic conditions	Default Risk
Natural Disturbance	Wildfire	Loss of project carbon through wildfire	Default Risk
	Disease/Insects	Loss of project carbon through disease and/or insects	Default Risk
	Other Episodic Catastrophic Events	Loss of project carbon from wind, snow and ice, or flooding events	Default Risk

D.1 Financial Risk

Financial failure of an organization resulting in bankruptcy can lead to dissolution of agreements and forest management activities to recover losses that result in reversals. Forest Projects that employ a Qualified Conservation Easement, or that occur on public lands, have lower risk.

Table D.2. Financial Risk Identification

Applies to all projects		
Identification of Risk	**Contribution to Reversal Risk Rating**	
Default Financial Risk	**Forest Project not on public lands or without a Qualified Conservation Easement**	**Forest Project on public lands or with a Qualified Conservation Easement**
	5%	1%

D.2 Management Risk

Management failure is the risk of management activities that directly or indirectly could lead to a reversal. Forest Projects that occur on public lands, or employ a Qualified Conservation Easement are exempt from this risk category.

Management Risk I – Illegal Removals of Forest Biomass

Illegal logging occurs when biomass is removed either by trespass or outside of a planned set of management activities that are controlled by regulation. Illegal logging is exacerbated by lack of controls and enforcement activities.

Table D.3. Risk of Illegal Removals of Forest Biomass

Applies to all projects	
Identification of Risk	**Contribution to Reversal Risk Rating**
United States Default Harvesting Risk	0%

Management Risk II – Conversion of Project Area to Alternative Land Uses

High values for development of housing and/or agriculture may compete with timber and carbon values and lead to a change in land use that affects carbon stocks. The risk of conversion of any Project Area to other non-forest uses is related to the probability of alternative uses, which are affected by many variables, including population growth, topography, proximity to provisions and metropolitan areas, availability of water and power, and quality of access to the Project Area.

Table D.4. Risk of Conversion to Alternative Land Use

Applies to all projects	
Identification of Risk	**Contribution to Reversal Risk Rating**
With Qualified Conservation Easement that explicitly encumbers all development rights	0%
Without Qualified Conservation Easement	2%

Management Risk III – Over-Harvesting

Favorable timber values, among other reasons, may motivate an Offset Project Operator or Authorized Project Designee to realize timber values at the expense of managing carbon stocks for which ARB or registry offset credits have been issued. Additionally, reversals can occur as the result of harvest associated with fuels treatments.

Table D.5. Risk of Over-Harvesting

Applies to all projects	
Identification of Risk	**Contribution to Reversal Risk Rating**
With Qualified Conservation Easement that explicitly encumbers timber harvesting associated with project stocks	0%
Without Qualified Conservation Easement	2%

D.3 Social Risk

Social risks exist due to changing government policies, regulations, and general economic conditions. The risks of social or political actions leading to reversals are low, but could be significant.

Table D.6. Social Risk Identification

Applies to all projects	
Identification of Risk	**Contribution to Reversal Risk Rating**
United States Default Social Risk	2%

D.4 Natural Disturbance Risk

Natural disturbances can pose a significant risk to the permanence of the GHG reductions and GHG removal enhancements. Natural disturbance risks are only partially controllable by

management activities. Management activities that improve resiliency to wildfire, insects, and disease can reduce these risks. Management activities that shift harvesting practices from live sequestering trees to trees that have succumbed to natural disturbances reduce or negate the reversal depending on the size and location of the disturbance.

Natural Disturbance Risk I – Wildfire

A wildfire has the potential to cause significant reversals, especially in certain carbon pools. These risks can be reduced by certain techniques including reducing surface fuel loads, removing ladder fuels, adding fuel breaks, and reducing stand density. However, these techniques cannot reduce emission risk to zero because all landowners will not undertake fuel treatments, nor can they prevent wildfire from occurring.

Table D.7. Natural Disturbance Risk I – Wildfire

Applies to all projects	
Identification of Risk	**Contribution to Reversal Risk Rating**
United States Default Fire Risk	4%
If fuel treatments have been implemented for the Project Area, reduce the value above by the appropriate Y% as indicated below.*	(4%) x Y%

* Depending on the level of fuel treatments, the Y% is set as follows:
- high level of fuel treatments = 50%,
- medium level of fuel treatments = 66.3%,
- low level of fuel treatments = 82.6%,
- no fuel treatments = 100%.

Natural Disturbance Risk II - Disease or Insect Outbreak

A disease or insect outbreak has the potential to cause a reversal, especially in certain carbon pools.

Table D.8. Natural Disturbance Risk II – Disease or Insect Outbreak

Applies to all projects	
Identification of Risk	**Contribution to Reversal Risk Rating**
Default Risk Contribution from Disease or Insect Outbreak	3%

Natural Disturbance Risk III - Other Episodic Catastrophic Events

A major wind-throw event (hurricane, tornado, high wind event) has the potential to cause a reversal, especially in certain carbon pools.

Table D.9. Natural Disturbance Risk III – Other Episodic Catastrophic Events.

Applies to all projects	
Identification of Risk	**Contribution to Reversal Risk Rating**
Default Risk Contribution from Other Catastrophic Events	3%

D.5 Summarizing the Risk Analysis and Contribution to Buffer Account

Use table D.10 to summarize the Forest Project's reversal risk rating. As indicated above, projects that employ a Qualified Conservation Easement, or that occur on public lands, are exempt from certain risk categories. Such Qualified Conservation Easements must clearly identify the goals and objectives of the Forest Project according to the terms of this protocol.

Table D.10. Project Contribution to the Buffer Account Based on Risk.

Risk Category	**Contribution from Risk Descriptions Above**		
	Source	Forest Project without a Qualified Conservation Easement and/or Public Ownership	Forest Projects with a Qualified Conservation Easement and/or Public Ownership
Financial Failure	Default Risk	5%	1%
Illegal Forest Biomass Removal	Default Risk	0%	0%
Conversion	Default Risk	2%	0%
Over-Harvesting	Default Risk	2%	0%
Social	Default Risk	2%	2%
Wildfire	Calculated Risk from worksheet	X%	X%
Disease or Insect Outbreak	Calculated Risk from worksheet	3%	3%
Other Catastrophic Events	Calculated Risk from worksheet	3%	3%

Completing the Risk Rating Analysis:

The Forest Project's reversal risk rating is calculated as follows:

$$100\% - \left(\begin{array}{l} (1 - FinancialFailure\%) \times (1 - IllegalForestBiomassRemoval\%) \times (1 - Conversion\%) \\ \times (1 - OverHarvesting\%) \times (1 - SocialRisk\%) \times (1 - Wildfire\%) \times (1 - Disease/InsectOutbreak\%) \\ \times (1 - OtherCatastrophicEvents\%) \end{array} \right)$$

Appendix E Reforestation Project Eligibility

This appendix presents a standardized approach to determine whether reforestation activities on lands that have undergone a Significant Disturbance are likely to be "business as usual," and therefore not eligible for registration based on the net present value for the timber expected to be produced from reforestation. A reforestation project is considered "business as usual" if the net present value for expected timber is $0 or more according to the criteria in Table E.1.

To determine whether a reforestation project is eligible, perform the following steps:

1. Identify whether site preparation costs[10] are High or Low:
    a. Site preparation costs are High if:
        i. Competing species management (including mechanical removal and/or use of herbicides) has been or will be conducted on 50 percent or more of the Project Area; or
        ii. Soil ripping has occurred on more than 50 percent of the Project Area.
    b. Site preparation costs are Low for all other projects.
2. Identify the value of harvested products (High, Medium, Low, or Very Low) corresponding to the project's Assessment Area, from the lookup table in the Forest Offset Protocol Resources section of ARB's website.
3. Identify the standard Rotation Age for the project's Assessment Area, from the lookup table in the Forest Offset Protocol Resources section of ARB's website.
4. Identify the site class category for the Project Area. The category must be consistent with the stated site productivity in the project's submission form. Projects with mixed site classes must round to the nearest site class category based on a weighted average.
    a. Site Classes I and II are classified as 'Higher'.
    b. Site Classes III, IV, and V are classified as 'Lower'.
5. Determine whether the Forest Project is "eligible" or "not eligible" according to the identified site preparation costs, value of harvested products, rotation age, and site class, as indicated in Table E.1.

[10] All Forest Projects are assumed to have similar costs related to the cost of seedlings and planting; site preparation costs, however, can vary depending on circumstances.

Table E.1. Determination of Reforestation Project Eligibility

Site Preparation Costs	Value of Harvested Products	Rotation Age (Length)	Site Class	Eligibility	Scenario #
High Site Preparation	High	Short, Medium, Long	Higher	Not Eligible	1
			Lower	Not Eligible	2
		Extremely Long	Higher	Eligible	3
			Lower	Eligible	4
	Medium	Short, Medium	Higher	Not Eligible	5
			Lower	Not Eligible	6
		Long	Higher	Not Eligible	7
			Lower	Eligible	8
		Extremely Long	Higher	Eligible	9
			Lower	Eligible	10
	Low	Short	Higher	Not Eligible	11
			Lower	Eligible	12
		Medium, Long, Extremely Long	Higher	Eligible	13
			Lower	Eligible	14
	Very Low	Short, Medium, Long, Extremely Long	Higher	Eligible	15
			Lower	Eligible	16
Low Site Preparation	High	Short, Medium	Higher	Not Eligible	17
			Lower	Not Eligible	18
		Long, Extremely Long	Higher	Not Eligible	19
			Lower	Eligible	20
	Medium	Short, Medium	Higher	Not Eligible	21
			Lower	Not Eligible	22
		Long	Higher	Not Eligible	23
			Lower	Eligible	24
		Extremely Long	Higher	Eligible	25
			Lower	Eligible	26
	Low	Short	Higher	Not Eligible	27
			Lower	Not Eligible	28
		Medium	Higher	Not Eligible	29
			Lower	Eligible	30
		Long, Extremely Long	Higher	Eligible	31
			Lower	Eligible	32
	Very Low	Medium, Long, Extremely Long	Higher	Eligible	33
			Lower	Eligible	34
		Short	Higher	Not Eligible	35
			Lower	Not Eligible	36

Appendix F Determining a Value for Common Practice

Quantification Methodology

Forest Assessment Areas Introduction
Assessment areas are used to provide standardized regional data for offset project development. An assessment area is generally defined as a forest vegetation community that shares common environmental, economical, and regulatory attributes. The Forest Offset Protocol Resources section of ARB's website provides data, by assessment area, necessary to calibrate and/or implement project accounting, including:

- Common Practice – The average carbon stocks (metric tons) of the above ground portion of live trees on private lands. The average carbon stock is the result of the suite of management activities within the assessment area. The common practice value is the extent to which improved forest management projects can receive credit for avoided emissions. (See Section 6.2.)
- Diversity Index – The maximum amount (by carbon percentage) of any one native species allowed within a project. (See Section 3.8.2.)
- The rotation length commonly used in the assessment area and the value of harvest for incorporating in a financial test for reforestation projects (see Appendix E).
- The mill efficiency used for calculating wood products (see Appendix C).
- The wood product classes generated for calculating wood products values (see Appendix C).

Defining Assessment Areas

The U.S. Forest Service Forest Inventory and Analysis Program (FIA) is the basis for development of assessment areas. The FIA program collects data on U.S. forests using an extensive array of coordinated sample plots throughout the nation. Together the plots comprise a national inventory system designed to assess the state of U.S. forests on an ongoing basis. The hierarchical and spatial nature of FIA data make it possible to group sample field plots by geographical location. FIA plots are assigned an attribute referred to as 'forest type' that identifies the dominant vegetation present at the plot. Forest Types were combined into forest communities following a process described further below. An assessment area is a forest community within a defined geographical unit. The geographical units are discussed below.

Ecosections are spatial units and can be mapped. The geographical units that contain assessment areas are based on individual ecosections or combined ecosections (called supersections). Supersections were created in order to stratify the plots into high site class and low site class (where possible) and to increase the statistical reliability of the common practice estimates derived for each assessment area. The combination of ecosections into supersections only occurred where adjacent ecosections share similar environmental, economic, and regulatory attributes. Ecosections are combined into supersections if:

1. The ecosections are adjacent to each other.
2. They share a similar distribution of plots by forest types, which indicates that the ecosections share similar climate, elevation, and other environmental variables.
3. The economics of forest management are similar between the ecosections. The criteria considered to determine economic commonality between ecosections include forest product

generation, transportation networks, forest product mill types, and wood products markets. This was based on professional knowledge of regional timber markets.

4. Regulations between ecosections are relatively homogeneous across ecosection boundaries. Ecosections are not combined into supersections in cases where forest practice regulations between adjoining administrative units are known to be markedly different.

The Forest Service computed the statistics for the combined forest types aggregated at the supersection level and disaggregated at the ecosection level. The statistics are reported on a per acre basis and include board foot volume, basal area (square feet), above ground carbon tons, and the sampling error. Ecosections were not combined into supersections if the aggregation changed average standing carbon stocks of any assessment areas by more than 10%, indicating that there are environmental, economic or regulatory differences affecting the forest stocks within these communities.

The aggregation of forest types into forest communities that define assessment areas is based on the natural forest communities found within the ecosections rather than the presence of a single dominant species as in plantation management. As an example, the Northwest Coast Range contains many forest holdings of intensively managed Douglas-fir forests, yet the natural forest community contains many other species such as western hemlock, Sitka spruce, and red alder, among others. The plots used to define the assessment area, as well as the common practice statistic, are the entire set of plots found in the natural forest community. No effort is made to isolate assessment areas based on the existence of plantations. Successional stage, including the presence of shade tolerance species, and management influence on species prevalence is not a basis for stratifying distinct communities. The Forest Offset Protocol Resources data on ARB's webpage displays the associations of forest species (forest types) and assessment areas for all of the ecosections and supersections. Figure F.1 summarizes conceptually the methodology for delineating assessment areas.

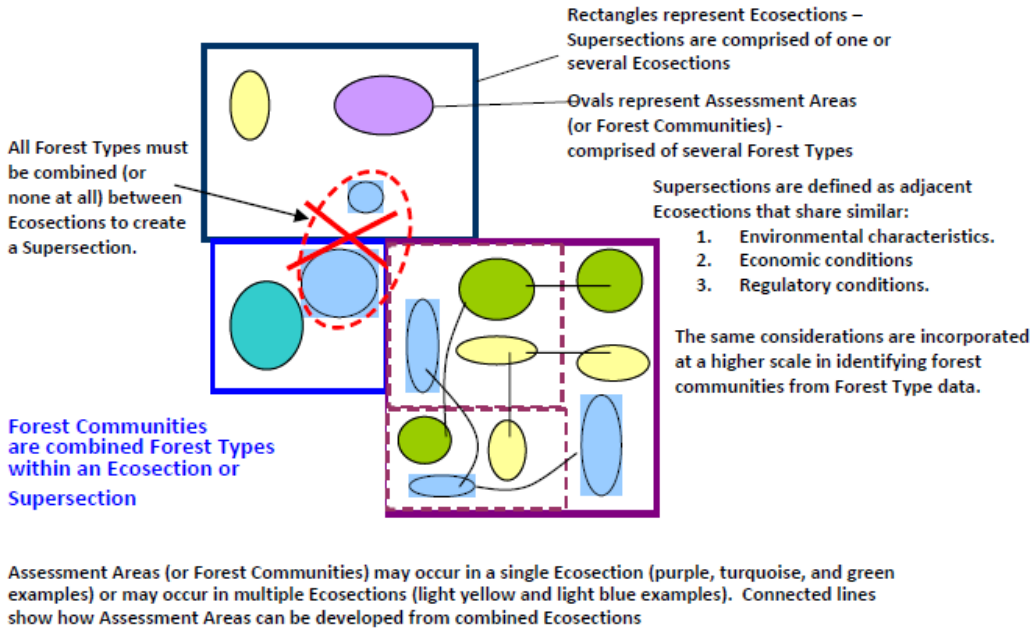


Figure F.1 Schematic of Process to Define Assessment Areas

Determining a Value for Common Practice

The following requirements and methods provide step by step instructions for determining the appropriate Common Practice value for an Improved Forest Management project based on its geographic location and boundaries.

1. **Determine the Geographic Ecosection(s) or Supersection(s) Within Which the Project Area is Located**
   The Offset Project Operator or Authorized Project Designee must determine the geographic Ecosection(s) or Supersection within which the Project Area is located by consulting maps of Supersections. These maps can be downloaded from the Forest Offset Protocol Resources section of ARB's website in either a .pdf format or a Geographical Information System (GIS) shapefile.

2. **Determine the Acreage of the Project Area That Falls Within Each Assessment Area Contained in the Ecosection(s) or Supersection(s)**

   Ecosections and Supersections may consist of one or many Assessment Areas. Assessment Areas are groupings of tree species that are commonly found in association with each other, as in a vegetation community. Assessment Areas are not mapped since the geographic locations of forest communities vary based on highly resolute environmental variables. To determine which Assessment Areas are included within the Project Area, compare the tree species in the Project Area to the species list associated with each Assessment Area in the project's Ecosection(s) or Supersection(s) (identified in Step 1). Tree species information must be looked up using the most current Assessment Area Data File from the Forest Offset Protocol Resources section of ARB's website. The minimum mapping resolution for vegetation communities is 20 acres. Therefore, any contiguous area 20 acres or greater within the Project Area that consists of a separate vegetation community must be independently mapped.

3. **Where Necessary, Stratify Project Area Acres According to Whether They Are High or Low Site Class**

   The Assessment Area Data File on the Forest Offset Protocol Resources section of ARB's website provides data for each Assessment Area by high, low, or all site classes. For Assessment Areas where data are attributed for high and low site classes, the Offset Project Operator or Authorized Project Designee must further stratify the Project Area and identify the acreage that falls within each site class.

   The computation of the statistics in the Assessment Area Data File (on a per acre basis) for board foot volume, basal area (square feet), and CO_2 equivalent was done for high and low site classes wherever the FIA plots were available in adequate quantity to achieve a sampling error of 18 percent or less. The board foot volume and basal area statistics are presented only to elucidate comparisons to the Common Practice (CO_2 equivalent) statistic. Board foot volume and basal area statistics are not used for other purposes in the protocol.

   For stratification purposes, a "high" site class means a Timber Site I or II (Forest Service Types I, II, and III). A low site class means a Timber Site III, IV, or V (Forest Service Types IV – VII). Landowners must determine the portion of the Project Area that is in each site class for each Assessment Area using soils data from a state or federal

agency, direct site class data from a state or federal agency, attestation from a state forester, or through field analysis. Whatever method is used, documentation of the analysis must be provided to the verifier at the project's initial verification.

4. **Identify the Common Practice Statistic Associated with Each Assessment Area and Site Class Stratum**

   For each Assessment Area and Site Class within the Project Area, identify the appropriate Common Practice statistic from Assessment Area Data File. The value displayed in the Assessment Area Data File indicates CO_2 equivalent metric tons per acre in the above ground portion (bole, bark, top and branches) of live trees.

   If data for an Assessment Area are provided for both high and low site classes, and a Offset Project Operator or Authorized Project Designee is unable or unwilling to stratify the Project Area into site classes using an acceptable method described above, then the high site-class Common Practice statistic must be used for all acres within the Assessment Area.

5. **Determine a Value for Common Practice for the Entire Project Area**

   Determine a single Common Practice value for the entire Project Area by calculating the average of the Common Practice statistics for each Assessment Area and site class, weighted by the number of acres of each Assessment Area and site class within the Project Area. See Table F1 for an example.

Table F1. Example of Common Practice Statistic Calculation

Ecosection(s) /Supersection(s)	Assessment Area	Site Class	Acres	Common Practice (Metric Tons CO2-e)
Name the Ecosection(s)/Supersection(s) the project is found within.	*Identify the Assessment Areas the project is in. If the project is in more than one site class for an Assessment Area, enter the Assessment Area twice*	*Enter the Site Class Value*	*Acres for each Assessment Area-Site Class Combination*	*Enter the Value from the most current Assessment Area Data File*
Adirondacks & Green Mountains	Adirondacks & Green Mountains Northeast Conifers	High	1,000	91.8
Adirondacks & Green Mountains	Adirondacks & Green Mountains Northeast Conifers	Low	100	84.4
Adirondacks & Green Mountains	Adirondacks & Green Mountains Northern Hardwood	High	50	102.8
Total Acres / Weighted Average Common Practice			**1,150**	**91.6**