

# VERIFICATION REPORT

## *Climate Action Reserve*

*CAR1261 – May Ranch Avoided  
Grassland Conversion Project*

**Reporting Period:  
14 December 2016 to 31 December 2017**

**Prepared for:  
Ducks Unlimited, Inc.**

**21 June 2018**



CLIMATE ACTION RESERVE



ISO 14065 Greenhouse Gas  
Validation and Verification Body  
#0821

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## Summary

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This report presents the findings of the verification assessment of the May Ranch Avoided Grassland Conversion Project (“the Project” or “May Ranch”) developed by Ducks Unlimited, Inc. (“the Project Proponent” or “Ducks Unlimited”). This assessment covers the Project’s greenhouse gas emission reductions reported to the Climate Action Reserve (the Reserve or CAR) for the verification period 14 December 2016 to 31 December 2017. The verification was undertaken to evaluate the Monitoring Plan, the Grassland Project Calculation Tool (GrasTool), and assess whether the compiled data conforms to the verification criteria.

The evaluation was undertaken using the CAR Grassland Project Protocol, Version 2.0, as well as the verification methodology developed by SCS for carbon offset projects submitted to the Reserve.

In the course of the verification assessment, the SCS verifiers developed findings which included New Information Requests (NIRs), Non-Conformity Reports (NCRs), and Observations (OBSs). All New Information Requests and Non-Conformity Reports have been adequately responded to, resulting in their closure.

On the basis of the information provided and the analyses completed, SCS was able to reach a decision on the emissions reduction reported by the Project Proponent to the Reserve. SCS verified the adequacy of the information provided in the Monitoring Plan and data in the GrasTool, confirming that these documents meets the requirements of the CAR standards. Further, SCS was able to reach a positive opinion on the claimed emission reductions and removals presented in the GrasTool and on the Reserve website by Ducks Unlimited. Thus, SCS has verified **10,591** metric tonnes of CO<sub>2</sub>e reductions and removals from May Ranch for the reporting period of 14 December 2016 to 31 December 2017.

## Introduction

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SCS Global Services (SCS) is a global leader in third-party certification, auditing, testing services, and standards. Established as an independent third-party certification firm in 1984, our goal is to recognize the highest levels of performance in environmental protection and social responsibility in the private and public sectors, and to stimulate continuous improvement in sustainable development. In 2012, Scientific Certification Systems, Inc. began doing business as SCS Global Services, communicating its global position with offices and representatives in over 20 countries. SCS is currently accredited to ISO 14065 for GHG Validation and Verification by the American National Standards Institute (ANSI) and offers carbon offset project validation and verification under the Verified Carbon Standard (VCS) and the American Carbon Registry (ACR). SCS also offers carbon offset verification under the Climate Action Reserve (CAR) and the Climate, Community and Biodiversity (CCB) standards.

SCS was commissioned by Ducks Unlimited to undertake the initial project verification of May Ranch. The project consists of emissions reductions from the avoided loss of soil carbon due to the avoided conversion and recorded conservation easement of grasslands in Southeast Colorado. This report covers the verification period of 14 December 2016 to 31 December 2017 as a project deliverable into the Reserve.

## Project Description

The May Ranch project is an avoided grasslands conversion project that includes emissions reductions from the avoided loss of soil carbon due to the avoided conversion and recorded conservation easement of grasslands in Prowers County, Colorado. The project includes reduction in emissions from the preservation of grasslands and livestock grazing compared to the baseline scenario of loss of belowground organic carbon through conversion to cropland and emission from crop production. The grassland in the project area is dominated by native grasses and forbs with little to no tree canopy. The verification team used on site observations and interviews with land owners to confirm that the project area remains in native grassland is not using synthetic fertilizer. The conservation easement was recorded on 14 December 2016.

## Verification Team

The SCS verification team consisted of the following individuals:

Lead Verifier: Francis Eaton

Verifiers: Tiffany Mayville, James Cwiklik

Senior Internal Reviewer: Blake Troxel

## Verification Details

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### Verification Objectives

The objective of the verification is to:

- Evaluate conformance with the project as defined in the criteria stated below.
- Determine with a reasonable level of assurance whether the Project has resulted in the GHG emissions reductions and/or removals as stated in the project documents.
- Evaluate the project planning information and documentation including the determination of project eligibility, project design, baseline and project emissions determination, management systems supporting the project, and methodologies employed for the calculation of GHG emission reductions.
- Assess reported GHG baseline, project emissions and emission reductions/removal enhancements, leakage assessment, and impermanence risk assessment and mitigation.

## Verification Criteria

SCS conducted the verification assessment of the project and project documentation against the following criteria:

- CAR Grassland Project Protocol, Version 2.0 (January 2017)
- Errata and Clarification GPP, Version 2.0 (November 2017)
- CAR Program Manual (September 2015)

As an ANSI-accredited verification body, SCS conducted the verification to the requirements of:

- CAR Verification Program Manual (February 2017)
- ISO 14064-3: 2006, Greenhouse Gases – Part 3: Specification with guidance for the validation and verification of GHG assertions

## Level of Assurance

SCS performed the core verification activities to a **reasonable level** of assurance as required by CAR.

## Treatment of Materiality

In consideration of the required level of assurance, the needs of the intended user and the requirements of the CAR Program, SCS applied a materiality threshold of **5%** because the total annual emissions reductions are under 25,000 tCO<sub>2</sub>e. The data reviewed was considered to meet the principles of accuracy, completeness, transparency and is free of material error or omission.

## Scope

The scope of the verification is defined as an independent and objective review of the project description document, the project's baseline study, monitoring plan, GrassTool, and emissions reductions calculation. SCS conducted the verification of greenhouse gas emission reductions from the May Ranch for Ducks Unlimited against the requirements of the verification criteria.

## Verification Process

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### Verification Summary

The verification process consisted of the following:

1. **Project listed with the Reserve:**

The May Ranch Avoided Conversion Grassland Project (CAR1261) is listed on the Reserve website. Ducks Unlimited selected SCS as their verification body.

2. **Conflict of Interest Review.**

A Notification of Verification Activities/Conflict of Interest (NOVA/COI) form was submitted to CAR. The COI assessment was conducted to identify any potential conflicts interests with the verification/project. No conflicts were identified and a determination of low potential for conflict of interest was received from CAR on 25 January 2018 prior to the commencement of verification activities.

3. **Introductory Meeting:**

A kick-off meeting was conducted between the verification team and Billy Gascoigne of Ducks Unlimited on 2 February 2018. The purpose of the kick-off meeting was to review the timeline of audit; confirm verification criteria; determine any changes in the site, sources, GHG management systems or personnel; and to begin gathering information.

4. **Desk Review**

SCS received and reviewed the Monitoring Plan, GrassTool, CAR submittals, and supporting documentation to assess initial conformance with the data requirements of the CAR Grassland Project Protocol, Version 2.0 (GPP). A risk assessment was conducted to identify key factors that impact the reported emission reductions and removals. A Verification Plan was created to focus on the critical elements presenting potential risk for errors with the project.

5. **Site Visit**

A site visit was conducted by the verification team on 07 March 2018. The purpose of the site visit is to verify the project equipment, location and eligibility; to review and evaluate the project GHG management systems, data collection and handling, and emission reduction calculations and procedures in place; and to finalize the risk assessment and sampling plan.

6. **Quantitative Review**

An assessment of the emission reduction calculation inputs and procedures was performed to review the quantitative analyses undertaken by the Project Proponent to convert the raw inventory data into emission reduction estimates.

7. **Findings**

Throughout the verification, there is an iterative exchange between SCS and the Project Proponent to gather additional information for review and examination. This exchange includes

the issuance of Findings—New Information Requests (NIR), Non-Conformity Reports (NCR), and Observations (OBS) — by SCS. The Project Proponent must respond to NIRs and NCRs in order for SCS to render a verification opinion. At this time of report submission all Findings have been appropriately addressed by Ducks Unlimited and subsequently closed by SCS.

#### 8. **Draft Report and Statement**

This step in the verification process includes a final review of the submitted data, completion of the Verification Report, and drafting of the Verification Statement. A draft Verification Report and Statement are completed based on the results of the verification assessment.

#### 9. **Senior Internal Review**

The draft report was presented to an SCS lead verifier, independent of the verification, who reviewed the report and determined the Verification Statement to be justified given the evidence presented. The Verification Report and Verification Statement were then presented to Ducks Unlimited for review and comment.

#### 10. **Final Report and Statement**

After Ducks Unlimited reviewed the verification documents, SCS uploaded them to the Reserve website for administrative review by the Reserve. Given a positive review, the Reserve will register the emissions reductions for the project and issue carbon tonnes for a reporting period of 14 December 2016 to 31 December 2017.

#### 11. **Exit meeting with client:**

The exit meeting entails a review of the verification process, summary of the verification findings, and to initiate scheduling for the next verification period.

## Verification Findings

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The May Ranch project (“the Project”) is an avoided grasslands conversion project that includes emissions reductions from the avoided loss of soil carbon due to the avoided conversion and recorded conservation easement of grasslands in Prowers County, Colorado. SCS verified the Project against the requirements of the CAR GPP. The following sections detail the most essential aspects of the verification of the Project.

### **Project Eligibility**

The GPP specifies eligibility rules that the Project must meet in order to register reductions with the Reserve. Below is a summary of the eligibility requirements and the Project’s compliance to each requirement.

#### **Location**

To be eligible, a project must be located in the conterminous United States. The Project is located in Prowers County, Colorado, US and therefore meets this eligibility requirement. SCS confirmed the location during the site visit on 07 March 2018.

Additionally, projects registered under the GPP must be located on land whose particular combination of Major Land Resource Area (MLRA), soil texture, and prior land used history would result in emissions of soil carbon in the baseline scenario. The verification team reviewed the performance thresholds laid out in Section 5.1 of the GPP and determined that this project is located within an eligible MLRA and is eligible under this requirement. SCS confirmed the Project falls within the Upper Arkansas Valley Rolling Plains MLRA, which was confirmed in the GrassTool and through running the stratum listed in the GrassTool in the USDA NRCS. The GPP also states that projects are not eligible if on organic soils (histosols), such as wetlands or peatlands. The verification team reviewed USGS SSURGO soil reports to ensure that no organic soils were included in the project area, so the project is eligible under these requirements of the GPP.

### **Project Boundary**

Prior to the site visit, the verification team reviewed the GIS files for the project boundary in both ArcMap and Google Earth. The team confirmed that waterways roads and areas of past management had all been removed from the eligible acres for the project area. Once on site, the verification team visited numerous points across the project area to perform ground truthing activities and confirmed that only areas defined as grassland have been included in the project area.

### **Project Start Date**

The start date (14 December 2016) is defined as the date at which the conservation easement was recorded for the Project. As stated in the GPP, to be eligible the project must be submitted to the Reserve within six (6) months after the project start date, unless the project was submitted for listing prior to 22 July 2016. The conservation easement for May Ranch was recorded on 14 December 2016. SCS reviewed the CAR Grassland Project Submittal Form and confirmed that the submittal date of 8 May 2017 is less than six months prior to the start date of 14 December 2016 and therefore the Project therefore meets the start date eligibility criteria of the GPP.

### **Additionality**

Project Proponents must indicate that reductions are above and beyond business as usual. In order to do so, the Project must pass a Performance Standard test, Legal Requirement test, and limits on payment and credit stacking.

#### ***Performance Standard***

For the Performance Standard test, a project developer must meet eligibility under 2 possible performance threshold scenarios: a financial threshold and suitability threshold. The following scenario applies to the May Ranch:

“The Reserve has developed a standardized threshold for financial additionality, referred to as the cropland premium. The cropland premium is determined as the percentage difference in the value (represented by land rental rates in \$/acre) of cropland over pastureland in the county where the project is located. Project eligibility is based on the cropland premium for the county where the project is located.”



The verification team reviewed the eligibility status and financial threshold of each county, available on the Reserve website. From this, the verification team determined that the cropland premium for Prowers, CO, where the project is located, is greater than 100%. Based on this location and crop premium, the project falls under the condition of “projects in counties with a cropland premium greater than 100% are eligible without any discount for uncertainty”, thus no discount is necessary and the Project meets the financial additionality threshold per the GPP. Additionally, the project is entirely located in Prowers County, so no other eligibility threshold for other counties needs to be assessed for this project.

“The project area must be suitable for conversion to cropland. Suitability is demonstrated by determining the Land Capability Classification (LCC) for the soil map units that are contained within or intersect the project area...This protocol offers two options for determining the allowable amount of LCC V-VI soils in the project area” This project used “Option 1: Default Land Capability Classification Threshold Based on Major Land Resource Area. The Reserve has developed a table of default, MLRA-specific LCC thresholds. The specific default value for each MLRA is contained in the Grassland Project Parameters spreadsheet. The percentage of cultivated land that is classified as NICC I-IV (rounded to the nearest whole number) represents the minimum allowable percentage of the project area for those land classes.”

After the site visit, the verification team downloaded soils data from the NRCS soils database to determine the NICC categories for the project area. Using these data, the verification team recalculated the NICC for the project area and confirmed the suitability of the land to be converted to cropland of 67% based on the MLRA-specific thresholds in the GPP. The table below provides the specific soil breakdown for the project area.

Acres	Percent.	Class I-IV	Class V	Class VI	Class VII
13319.2	100	68%		0	32%

Soil Texture	Acres
Coarse	3808.8
Fine	1071.2
Medium	8439.2
Totals	13319.2

Based on the verification team’s review of the Project documentation, the inspection during the site visit, and additional evidence provided, it has been determined that the documents and interviews support the scenario described above and meet the performance threshold.

**Legal Requirements**

For the Legal Requirements Test, the Project Proponent must ensure that emission reductions achieved by the Project would not have occurred in the baseline case due to federal, state, or local regulations.

A regulatory review of the Project was conducted by the verification team. The results of the regulatory review indicated the Project is in compliance with Federal, State and Local regulations. There are no federal, state, or local regulations for the project to be maintained as grassland, nor is there any zoning, permitting, ownership, or other legal obstacle to the conversion of the project area to cropland. Additionally, there is no federal, state, or local regulation to prohibit the project area to be managed as cropland.

SCS reviewed the Project's monitoring plan and confirmed that Ducks Unlimited developed a procedure to ascertain and demonstrate that the project at all times passes the legal requirements test at all times. SCS also confirmed that any legal restriction that would have been identified in the granting of the conservation easement, thus the establishment of the easement confirm that the project passes this eligibility requirement.

Lastly, SCS reviewed the Attestation of Voluntary Implementation, signed on 23 May 2018 by an eligible signatory to attest for the Project. Ducks Unlimited has affirmed that the Project was established and implemented voluntarily and continues to operate as such. Based on this evidence, SCS concludes the Project passes the legal requirements test.

#### ***Limits on payment and credit stacking***

Under the GPP, mitigation credits are allowed for the same activity in a project area if they are offsetting other environmental impacts or are issued for management or conservation practices, both aimed at permanently conserving grassland. For this project, no credit or payment stacking has occurred.

#### **Crediting Period**

The crediting period for grassland projects is up to 50 years from the project start date. The crediting period for the Project extends to 13 December 2066, 50 years from the project start date. SCS has concluded that the reporting period verified in this report is within the first crediting period of the Project.

#### **Permanence**

Under the GPP, a project's reversible emission reductions must be permanent. To be considered permanent, emission reductions must have carbon that is stored for at least 100 years following issuance. To fulfil this requirement of the GPP, a Project Proponent must monitor and verify the project for those 100 years. The verification team conducted interviews with the project personnel who indicated that the ongoing monitoring requirements will be met.

A release of the carbon before the end of the 100-year period after issuance is considered a "reversal", which can happen due to various disturbances to the project area. The GPP distinguishes between two

categories of reversals: avoidable and unavoidable. Based on interviews with project personnel, inspection of the project area during the site visit, and the fact that no credits have been issued for this project, the verification team has determined that no reversals occurred in the project area during the reporting period.

### ***Qualified Conservation Easement***

Under the GPP, a conservation easement is required for all grassland project. The verification team conducted spatial analysis of the project area and confirmed that there is an existing Conservation Easement and the entire project area is included in the area of the conservation easement during this reporting period. The verification team also reviewed the conservation easement for the Project, dated 14 December 2016, and confirmed that the easement was granted to protect the project area from conversion to cropland. In addition the verification team confirmed that the Colorado Cattleman's Agricultural Land Trust (CCALT) is the holder of the easement and have been successfully monitoring grassland and rangeland easements for over 20 years.

### ***Project Implementation Agreement***

Under the GPP, permanence obligations must be guaranteed through a legal agreement dictating the obligation of the Project Proponent to conduct monitoring activities during the 100-year period after issuance, as detailed above. After this report has been submitted to the Reserve, the Project Proponent will enact a Contract Project Implementation Agreement (PIA) between the Project Owner, May Farms, and the Reserve, agreeing to meeting the permanence and monitoring requirements. The verification team will reassess this requirement once the agreement has been signed.

### **Reversal Risk**

The verification team reviewed table 5.4 of the protocol and used the appropriate risk factors from the table as inputs to the calculation tab of the CAR Grassland Tool and confirmed that the risk reversal rating of 2% resulting in a buffer allocation of 192 tonnes has been reported by project personnel correctly. The table below shows the specific breakdown of risk categories for the project.

Default Risk	PIA Project	Owner	Site Visit	RiskSV	Riskrev
0.02	Contract PIA	Accredited land trust	Yes	0	0.02

## **Regulatory Compliance**

SCS reviewed the Attestation of Regulatory Compliance submitted by Ducks Unlimited dated 23 May 2018 affirming the Project's compliance status throughout the reporting period. During the site visit and desk review activities, SCS was able to confirm to a reasonable level of assurance that the Project is in compliance with local, state, and Federal regulations and had no material regulatory non-conformance events.

Additionally, SCS conducted a series of checks to confirm compliance with local, state, and federal regulations. The verification team reviewed the EPA Enforcement & Compliance History Online database (ECHO) for the reporting period 14 December 2016 to 31 December 2017 and found no evidence of non-compliance. The team also reviewed the EPA Annual Enforcement results for Prowers County during the reporting period and found no evidence of violations for the project area. Finally, SCS conducted a review of notices of violations for the Project Owner and Project Proponent under the Colorado Department of Public Health & Environment for water quality, the Colorado Department of Agriculture for pesticides, and the US Department of Labor – Occupational Safety and Health Administration (OSHA) and found no evidence of any violations occurring during the reporting period. The verification team also held a phone interview with individuals representing the easement holder who confirmed that no violations with respect to the easement occurred during the reporting period.

Lastly, SCS also confirmed the Project's monitoring plan confirmed that regular regulatory compliance inspections will occur to ensure the project is in compliance with Federal, State, and Local regulations. Based on these reviews, SCS concludes the Project met the Regulatory Compliance requirements of the GPP.

## **Ecosystem Health**

Under the GPP, a periodic assessment of the rangeland health must be conducted to protect against degradation of the project area. The verification team reviewed the rangeland assessment provided in the May Ranch Baseline document and confirmed the assessment has been performed. This should be assessed at each subsequent verification event

## **Ownership**

This Project has been implemented using a Grassland Owner/Easement Owner and Project Owner approach. May Farms is the Grassland Owner and Colorado Cattlemen's Agricultural Land Trust holds the conservation easement deed. Ownership was confirmed through review of the Deed of Conservation Easement. SCS confirmed the Project Developer, Ducks Unlimited, is the Project Owner, and thus retains full, legal, and beneficial title to the carbon offset credits being issued as a result of the Project. Based on the Ownership Interests Documentation, Ducks Unlimited is the Project Developer/Owner and holds GHG reduction rights for this Project.

Lastly, SCS reviewed the Attestation of Title signed by the Director of Operations of Ducks Unlimited dated 22 May 2018 and the GHG agreement (GHG Option Agreement\_Dallas\_May\_signed\_for\_CAR.pdf) concerning ownership of emission reduction credits for the reporting period. This document asserts that

the project applicant has legal rights to any emission reduction credits to be issued by the Reserve. From this evidence, SCS has concluded that Ducks Unlimited is entitled to receive the emission reduction credits that may be issued by the Reserve for offsets created during this reporting period.

## The GHG Assessment Boundary

The Project includes emission sources from the avoided conversion of grassland to cropland and livestock grazing. The sources of GHG emissions reviewed include:

The GHG sources, sinks, and reservoirs associated with the baseline scenario are:

- SSR 1 – Soil Organic Carbon
- SSR 2 – Belowground Biomass
- SSR 3 – Soil Nitrogen Dynamics and Fertilization
- SSR 4 – Agricultural Equipment from Site Preparation and Ongoing Activities
- SSR 5 – Burning
- SSR 6 - Grazing

The GHG sources, sinks, and reservoirs associated with the project are:

- SSR 1 – Soil Organic Carbon
- SSR 2 – Belowground Biomass
- SSR 3 – Soil Nitrogen Dynamics and Fertilization
- SSR 4 – Agricultural Equipment from Site Preparation and Ongoing Activities
- SSR 5 – Burning
- SSR 6 - Grazing

The gases reviewed include CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. All gases are converted to CO<sub>2</sub> equivalents.

## Review of Project GHG Management Systems

GHG emission reductions under the GPP are quantified by comparing actual emissions from the Project activities against the baseline scenario. During the site visit, SCS reviewed the Project's GHG management systems with the Project Proponent. SCS confirmed that the claimed project activities were taking place and that the project area was grassland as defined in the GPP. The verification team also confirmed that the project was monitoring fossil fuel use, and that the Project and Monitoring Plan will is sufficient to ensure compliance with the GPP.

### Monitoring Ongoing Eligibility

To maintain eligibility, the Project must demonstrate that the project area has not been converted to any other land use during the current reporting period. The verification team conducted a site visit of the project area to confirm the project area has not been converted during this reporting period and thus is in compliance with the GPP.

### Monitoring Grazing

The GPP requires that the Project must have a limited to moderate level of grazing, and that a monitoring of grazing activities must be implemented during the reporting period. The verification team reviewed the conservation easement (as allowed by CAR. Guidance provided by Max DuBuisson of 4 May) and the monitoring of grazing over the reporting the reporting period and confirmed that the level of grazing is light to moderate.

### Monitoring Project Emission Sources

Through the site visit and interviews with project personnel, the verification team confirmed that the Project emissions sources are monitored and recorded monthly in the land trust operational reports, and thus is following the monitoring requirements in the GPP.

During the site visit, the verification team reviewed stocking numbers for cattle grazing in the project area and confirmed that the values input into the grass tool are reported accurately. In addition, during the review of land-use history, the verification team used historical imagery to confirm the absence of fire during the reporting period. Finally, at each area visited by the verification team, the auditor observed no evidence of charcoal in the soil, further confirming the claims of the project developers and landowners.

### Monitoring Ecosystem Health

The GPP requires that Projects undergo periodic assessments of rangeland health and to assess the severity of the health of the Project Area. The GPP also states that the rangeland health assessment be conducted by an appropriately-trained individual. The Project Proponent provided an NRCS rangeland assessment, which the verification team determined to be 1) prepared by appropriately-trained professionals, 2) that this assessment meets the requirements of the GPP, and 3) that the rangeland health has not departed from the expected condition.

### Monitoring Parameters

A monitoring plan have been created for the Project. The contents of the monitoring plan were thoroughly reviewed and observed to meet the requirements of the GPP. SCS performed a desk assessment of the Project documentation and performed a site visit to check the project parameters, which can be found in Table 6.1 of the GPP, were in conformance with the GPP. Based on this table and the document review, the verification team confirms that the required documentation was provided for the verification process during the reporting period.

## **Quantitative Review of Carbon Reductions and Removals**

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SCS devoted a portion of the verification assessment to the review of the manner and propriety by which Ducks Unlimited quantified their net GHG reductions and removals. This assessment included a review of the baseline determination, review of project assumptions, raw data inputs and accuracy of calculations. The formulas and raw data inputs used to determine emission reduction calculations as described in the monitoring plan and the calculation spreadsheets were first reviewed for compliance with the GPP.

The verification team verified the data input in to the GrassTool was correct. SCS performed a datacheck on the GrassTool by inputting data from sources provided by the Project Proponent and checking them against the results from the Project Proponent's GrassTool Report. SCS confirms that the project emissions calculations are correct and material and in conformation with the GPP.

#### Zero Credit Reporting Period

There were no zero credit periods for the Project applicable for this reporting period.

#### Variations or Deviations

For this reporting period, there were no variances or deviations

### **Stratification**

Under the GPP, projects must identify the stratum of the project area by:

1. Geography and associated climate
2. Soil Texture, and
3. Previous land use

The verification team reviewed the stratification data for the Project entered in the GrassTool. SCS confirmed that the project area has three stratum. SCS verified this by first confirming the project area then using maps of the project area to develop a list of the soil types, confirming that the project identified three stratum was correct. SCS then had to verify the different levels of stratification, as listed above. SCS reviewed the geography and climate associate with the stratum though a check with the MLRA designations via the USDA NRCS and confirmed that the Project's geography stratification of Upper Arkansas Valley Rolling Plains. SCS also reviewed the soil texture stratification listed by the client, and performed data checks using SSURGO to confirm the soil types and the identification of three stratum in the project area. SCS confirmed the soil type stratification of coarse, medium, and fine as listed in the GrassTool. Finally, the verification team performed a previous land use check to determine previous land use stratification. The verification team reviewed historical imagery of the project area confirming all of the project area to be grassland for greater than 30 years. From this evidence, the verification team is able to confirm the project area has been managed as a grassland for more than 30 years, thus is able to apply the 30+ year stratification class to the project. Though the various data checks SCS verified the stratification as listed in the GrassTool.

## Verification Results

The verification of the May Ranch Avoided Grassland Conversion Project focused on the accurate collection of data and quantification of emission reductions as implemented by Ducks Unlimited in accordance to with the verification criteria. A sample set of data was randomly selected and reviewed in order to identify material misstatements due to transcription mistakes, mathematical errors, or malfunction of instruments. The emission reduction calculations were recalculated by the verification team and found to be conformance with the GPP, Version 2.0.

Based upon the verification process and the evidence collected, SCS concludes that the GHG assertion is a fair representation of the Project emission reductions resulting from avoided conversion of grassland to cropland and grazing activity during the reporting 14 December 2016 to 31 December 2017 and can be considered:

- In conformance with the CAR Grassland Project Protocol, Version 2.0 (January 2017)
- Without material discrepancy, and
- Verified to a reasonable level of assurance.

The following provides a summary of the verification results:

Emission Years Verified	Baseline Emissions CO <sub>2</sub> e (metric tons)	Project Emissions CO <sub>2</sub> e (metric tons)	Buffer Pool Contribution CO <sub>2</sub> e (metric tons)	Total Emission Reductions CO <sub>2</sub> e (metric tons)	Materiality
<b>2017</b>	<b>15,163</b>	<b>4,572</b>	<b>192</b>	<b>10,591</b>	<b>0%</b>


*Note: final numbers are rounded for simplicity.*

Throughout the verification process, SCS made several supplemental documentation requests in the form of Findings – NIRs, NCRs, and OBSs. These requests provided clarification regarding the project. The Findings from the verification of the Ducks Unlimited are compiled in a separate “List of Findings” and are available under separate cover. The List of Findings is only shared between the Project Proponent and verifier and is not publicly available.



## Recommendation

The Lead Verifier recommends that SCS Global Services issue a Positive verification opinion for the following:

<b>Project Developer Name &amp; Address</b>	Ducks Unlimited, Inc. 1825 Sharp Point Dr, #118 Fort Collins, CO 80525
<b>Scope of Verification</b>	Emission reductions from the avoided conversion of grassland to cropland from May Ranch Avoided Grassland Conversion Project
<b>Reporting Period</b>	14 December 2016 to 31 December 2017
<b>Total GHG Emission Reductions Verified</b>	10,591 metric tonnes CO <sub>2</sub> e
<b>GHG Protocol(s) Used for Verification</b>	<ul style="list-style-type: none"> <li>■ CAR Grassland Project Protocol, Version 2.0 (January 2017)</li> <li>■ Errata and Clarification GPP, Version 2.0 (November 2017)</li> <li>■ CAR Verification Program Manual (February 2017)</li> <li>■ CAR Program Manual (September 2015)</li> <li>■ ISO 14064-3:2006, Greenhouse Gases – Part 3: Specification with guidance for the validation and verification of GHG assertions</li> </ul>
<b>Lead Verifier's Approval</b>	 Francis Easton, 13 June 2018
<b>Senior Internall Reviewer's Approval</b>	 Blake Troxel, 13 June 2018
<b>Date of Verification</b>	The Verification Statement is to be dated when the senior internal reviewer accepts the recommendation to issue the statement.

## Appendix A: SCS Certification Mark

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Congratulations on receiving a positive verification for May Ranch Avoided Grassland Conversion Project. Your project is now eligible to use the SCS Kingfisher Certification Mark B for Carbon Offset Project Verification, as represented on the cover page of this verification report. The SCS Kingfisher Certification Mark increases the recognition of your achievements with your verification carbon offset project.

Please refer to the *SCS Kingfisher Certification Mark Labeling and Language Guide: Mark B* provided to you by the GHG Verification Program staff for more information about your Mark and usage. Should you have any additional questions regarding your Mark, use, messaging, or other marketing opportunities, please contact the GHG Verification Team or SCS Marketing Staff at [NRmarcom@scsglobalservices.com](mailto:NRmarcom@scsglobalservices.com).