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# INITIAL OFFSET PROJECT DATA REPORT

GREEN DIAMOND RESOURCE COMPANY  
THOMPSON RIVER IFM

**FOR THE REPORTING PERIOD FROM  
02/10/2021 – 03/31/2022**

**California Air Resources Board (ARB)  
Compliance Offset Protocol U.S. Forest Projects**

**Adopted: June 25, 2015**

**ARB Project ID: CAFR5741**

**Project ID: ACR741**

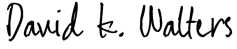
**Version 2.4**

**Completed June 15, 2023**

**Submitted June 15, 2023**

## ATTESTATION

*I certify under penalty of perjury under the laws of the State of California the GHG reductions and/or GHG removal enhancements for Green Diamond Resource Company Thompson River IFM from 02/10/2022 to 03/31/23 are measured in accordance with the Compliance Offset Protocol U.S. Forest Projects Adopted: June 25, 2015 and all information required to be submitted to ARB in the Offset Project Data Report is true, accurate, and complete.*

DocuSigned by:  
  
7855F59D1A63420...

Date: 06/15/2023

Dave Walters  
Printed Name

Vice President of Acquisitions and Business Development  
Title

## ABOUT THIS DOCUMENT

The purpose of this document is to fulfill all applicable requirements in Section 7.1 of the Compliance Offset Protocol U.S. Forest Projects adopted June 25, 2015 ("the Protocol"). In conjunction with the relevant attachments, it constitutes the offset project data report for the initial reporting period.

## LISTING INFORMATION REQUIRED FOR ALL PROJECTS

- a) The following is provided:
  - 1) Offset project name: Green Diamond Resource Company Thompson River IFM ("the project")
  - 2) Offset project type: improved forest management (IFM)
  - 3) Contact information for:
    - A) Offset project operator (OPO)
      - 1) Name: Green Diamond Resource Company
      - 2) Phone number: (206) 224-5800
      - 3) Mailing address: 1301 Fifth Avenue Suite 2700, Seattle, WA 98101-2613
      - 4) Physical address: Same as mailing address
      - 5) Email address: zane.haxtema@greendiamond.com
    - B) Authorized project designee (APD): No APD/not applicable
    - C) The person submitting the information:
      - 1) Name: Zane Haxtema
      - 2) Phone number: (206) 224-5815
      - 3) Mailing address: 1301 Fifth Avenue Suite 2700, Seattle, WA 98101-2613
      - 4) Physical address: Same as mailing address
      - 5) Email address: zane.haxtema@greendiamond.com
    - D) Any technical consultants: No technical consultants/not applicable
  - 4) CITSS ID number for the:
    - A) OPO: CA 1965
    - B) APD: No APD/not applicable
  - 5) Date listing information (in this document) was completed for submittal: see date of submittal on cover page
  - 6) Whether the OPO is the owner in fee for the project area:
    - A) Yes, the OPO is the owner in fee for the project area. An Owner's Policy of Title Insurance showing the OPO's ownership interest in the property and its interest in the trees and standing timber on the property is annexed to this document as Attachment A.
  - 7) Description of forestland and resource ownership for the real property within the project area: The OPO owns the fee interest in all property within the project area. However, there are numerous third parties with ownership interest in the property. Such interests may include access easements, rights-of-way, conservation easements, mining claims or other encumbrances.
  - 8) Name and mailing address of all forest owners including in fee as well as third parties with existing property interests within the project area that may have an effect on the trees and standing timber located in the project area (e.g., mineral rights, timber rights, easements, rights of way, leases, etc.)
    - A) The OPO owns the fee interest in all property within the project area. While there are numerous third parties with rights in the property (e.g. easements), to the OPO's knowledge, none of those third parties possess rights in the property that may have a significant effect on the trees and standing timber located in the project area. The name and mailing address of all owners of any interest in the real (as opposed to personal) property involved in the forest offset project is provided in the Excel workbooks entitled "Flathead ARB Forest Owners List for MTT Carbon", "Lincoln\_ARB Forest Owners List for MTT Carbon" and "Sanders ARB Forest Owners List for MTT Carbon", each of which is incorporated by reference into this document.

- 9) Name and mailing address of other parties with a material interest in the real property involved in the forest project: not applicable (there are no such parties that are not already listed under the above item #8)
- 10) Physical address of the project site: not available (no such physical address exists)
- 11) The offset project occurs solely on private lands, and the offset project does not occur 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)
  - C) Land that is owned by any person, entity, or Tribe, within the external borders of such Indian lands;
- 12) As the project is not located on one of the categories of land listed in the above (a)(11)(A)-(C), a description and copies of documentation demonstrating that the land is owned by (or subject to an ownership or possessory interest of) a tribe or private entities is not required.
- 13) As the forest project is not located on public land, a description of the approval process and public vetting processes necessary to evaluate management and policy decisions concerning the offset project that has or will take place in order to obtain approval of the offset project's management activities and baseline is not required.
- 14) The assessment areas within which the project area falls, along with the number of acres of project lands falling within each assessment area, is as follows.
  - A) Bitterroot Mixed Conifer: 167.97 acres.
  - B) Northern Rockies Mixed Conifer: 68,828.68 acres.
  - C) Northern Rockies Spruce / Fir: 335.76 acres.
  - D) Northern Rockies Subalpine Mixed Conifer: 2,532.20 acres.
  - E) The total project area acreage is approximately 71,864.61 acres.
- 15) A georeferenced GIS shapefile of the project area boundary, of adequate resolution to clearly identify the features indicated below, is annexed to this document as Attachment E. Where required, a description of these features is included below:
  - A) The project is located in Sanders and Flathead Counties in Montana; the project area is located at the following coordinates: 47.820754 degrees north, -115.018506 degrees west.
  - B) A description of public and private roads is not required.
  - C) A description of towns is not required.
  - D) A description of major watercourses, water bodies, and watershed description is not required.
  - E) A description of topography is not required.
  - F) A description of townships, ranges and sections is not required.
  - G) The project area is in a forested land cover and a forested land use.
  - H) The following forest vegetation types predominate within the project area boundary, according to the Montana Land Cover (MTLC) 2021 V1 dataset: Harvested forest-grass regeneration; Harvested forest-shrub regeneration; Harvested forest-tree regeneration; Northern Rocky Mountain Lower Montane Riparian Woodland and Shrubland; Recently burned forest; Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest; Rocky Mountain Lodgepole Pine Forest; Rocky Mountain Mesic Montane Mixed Conifer Forest; Rocky Mountain Montane-Foothill Deciduous Shrubland; Rocky Mountain Ponderosa Pine Woodland and Savanna; Rocky Mountain Subalpine Deciduous Shrubland and Western Larch Savanna.
  - I) The OPO is unwilling to stratify the project area into site classes using an acceptable method described in Appendix F of the FOP, and so all of the land within the project area is assumed to fall within the High site class.
  - J) Land pressures and climate/zone classification
    - 1) There is some pressure to convert individual parcels within the project area to a higher and better use, such as for "ranchettes" or other rural residences.
    - 2) The project area lies predominately in the 4b, 5a, 5b and 6a climate zones as shown on the 2012 USDA Plant Hardiness Zone Map.<sup>1</sup>
  - K) Historical land uses, current zoning, and projected land use within project area and surrounding areas

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<sup>1</sup> As accessed at

[https://www.fs.fed.us/wildflowers/Native\\_Plant\\_Materials/Native\\_Gardening/hardinesszones.shtml](https://www.fs.fed.us/wildflowers/Native_Plant_Materials/Native_Gardening/hardinesszones.shtml).

- 1) Historical land uses within the project area and surrounding areas: The area has historically been used for timber production and outdoor recreation. Surrounding areas have historically been used for timber production, outdoor recreation, ranching and rural residences.
  - 2) Current zoning within the project area and surrounding areas: The current zoning of the project area is "VAC\_R" ("Vacant Land – Rural"). Surrounding areas are zoned "VAC\_R" as well as "FARM\_R" ("Farmstead – Rural") or "EP" ("Exempt" property administered by the State of Montana or United States Forest Service).
  - 3) Projected land use within the project area and surrounding areas: All of the historical land uses are within the project area and surrounding areas, as described above under item (K)(1), are projected to continue into the future.
- 16) Offset project commencement date and specification of the action(s) that identify the offset project commencement date: The offset project commencement date is 02/10/21, the day on which the transfer of the real property included in the project area to the OPO was completed (as denoted by the recordation of grant deeds conveying ownership interest--the final deeds were recorded with the Flathead County Recorder on 02/10/2021). Thus, this date is a valid offset project commencement date following Section 3.6(a)(2)(B) of the Protocol.
- 17) Initial reporting period start and end dates: The initial reporting period started on 02/10/2021 and ended on 03/31/2022.
- 18) As documented in item (a)(19)(C) below, the current low stocking levels within the project area are attributable to the management history of the property. The OPO will reverse this trend by decelerating harvest (relative to historical levels) and, where warranted, by making investments in silvicultural treatments that will increase long-term productivity and forest health.
- 19) A description of the forest conditions within the project area follows:
- A) Species (tree) composition: The species composition is typical of mixed conifer forests in western Montana, with a diverse assemblage of conifer species that may include Douglas-fir, western larch, true firs (grand and/or subalpine fir), pines (lodgepole, ponderosa and/or western white pine), hemlocks (western and/or mountain hemlock), Engelmann spruce and western redcedar.
  - B) Age class distribution: While some older trees have been left in riparian zones or as residuals in regeneration cuts carried out as part of seed tree/shelterwood silviculture, the age class distribution tends to skew towards younger trees, as the historical management practice has been to attempt to harvest trees before they get older and growth slows.
  - C) Management history: The real property owned by the OPO in Montana (which includes the project area) was originally part of a much larger ownership footprint owned by Burlington Northern. Ownership of the land transitioned to Plum Creek when Burlington Northern "spun off" the latter entity. Ownership then transferred to Weyerhaeuser when Plum Creek and Weyerhaeuser merged, with Weyerhaeuser being the surviving company. The land base was then owned by Southern Pine Plantations for a short period of time prior to acquisition by the OPO. Prior to the 1990s, a fairly light style of timber harvesting generally prevailed within the ownership. However, in the 1990s, Plum Creek began two trends that shaped the land base as it currently exists: (1) A significant acceleration of harvest levels and (2) The sale of large blocks out of the original Burlington Northern holdings, to the point where in 2018 there were only approximately 680,000 acres remaining. (This 680,000 acres was finally sold to Southern Pine Plantations, and Southern Pine Plantations sold a portion of its holdings to Green Diamond.) By the time of the acquisition of the 680,000-acre property by Southern Pine Plantations, stocking had been reduced to significantly lower levels than in prior decades.
- 20) The OPO will not employ a qualified conservation easement.
- 21) The offset project does not employ broadcast fertilization.
- 22) The forest owner and any affiliates will demonstrate sustainable harvesting practices on all forest landholdings by employing one or a combination of the following options:
- A) Third-party certification under the Forest Stewardship Council and/or Sustainable Forestry Initiative
  - B) Conducting forest management operations 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
- 23) A description of how the offset project meets (or will meet) the natural forest management criteria is

- annexed to this document as Attachment G.
- 24) A description of the inventory methodology for each of the carbon pools included in the offset project boundary follows. The forest carbon inventory methodology is annexed to this document as Attachment C, and the public summary description of the forest carbon inventory methodology is annexed to this document as Attachment M.
- A) Sample points (SPs) have been laid out in a systematic grid across the project area.
  - B) At each sample point, a nested plot design is employed.
    - 1) A variable plot with a basal area factor of 5 is used for trees with a diameter at breast height (DBH) greater than or equal to 3.1 inches (live trees) or 5.0 inches (dead trees), but less than 13.6 inches.
    - 2) A 1/5<sup>th</sup> acre fixed plot is used for live and dead trees with a DBH greater than or equal to 13.6 inches.
    - 3) Live trees at least 4.5 feet in height that are less than 3.1 inches in DBH are sampled on a 1/100<sup>th</sup> acre fixed plot, but such trees will not be included in the carbon stocking calculations until they are 3.1 inches in DBH (i.e., a 3.1-inch cutoff has been employed in the carbon stocking calculations for live trees).
  - C) The forest will be stratified based on metric of interest that correlates positively with total carbon stocking, and SPs will be assigned to strata based on the stocking (as measured using the metric of interest) of the stand in which SP is nominally located, based on GIS analysis.
  - D) Each SP is located with a commercial-grade GNSS unit and permanently monumented to facilitate future re-measurement and site visit verifications.
  - E) The inventory is audited during the collection process and corrective actions implemented to maintain data quality.
  - F) Below is the list of tree data to be collected at each sample point.
    - 1) IFM-1 Standing Live: At each SP, "in" trees are tallied along with species, DBH (for trees with a DBH greater than or equal to 3.1 inches), total height, actual height (if relevant) and soundness deduction. These sample plots will provide inventory estimates in terms of cubic foot volume and biomass following the procedures and guidance listed on ARB's website and within the FOP.
    - 2) IFM-3 Standing Dead: At each SP, "in" trees will be tallied along with species, DBH, total height, actual height (if relevant), soundness deduction and decomposition class. These sample plots will provide inventory estimates in terms of cubic foot volume and biomass following the procedures and guidance listed on ARB's website and within the FOP.
- 25) A matrix documenting any and all legal constraints affecting forest management activities in the project area is annexed to this document as Attachment H.
- 26) A general description of the modeling plan, identifying the ARB approved growth model to be used for the project, follows. The modeling plan is annexed to this document as Attachment B, and the public summary description of the modeling plan is annexed to this document as Attachment N.

The Inland Empire variant of the Forest Vegetation Simulator model (FVS) was used for modeling purposes. FVS was run in "plots as stands" mode (i.e., each sample point constituted its own "stand"). The model was calibrated through the inputs set in the FVS\_PlotInit table (e.g., location code, latitude/longitude, elevation and forest type code will all be specified) and additional calibrations employed included modification to the default maximum stand density indexes and turning off tripling.

Riparian buffers have been implemented in GIS, using the restrictions identified in the Native Fish Habitat Conservation Plan, and sample points nominally located within those buffers have been identified. The silviculture modeled for these sample points followed the requirements set out in the Native Fish Habitat Conservation Plan—this generally amounted to retention of 10% of pre-harvest stocking in Class 3 riparian management zones and 88 trees per acre greater than or equal to 8 inches DBH (or 50% of pre-harvest stocking, whichever is greater) in Class 1 non-fish-bearing and Class 2 riparian management zones. No harvest was modeled in Class 1 fish-bearing riparian management zones.

Outside riparian management zones, the baseline was generally modeled as the historical management regime, a profitable industrial timberland management regime that still adheres to the principles of

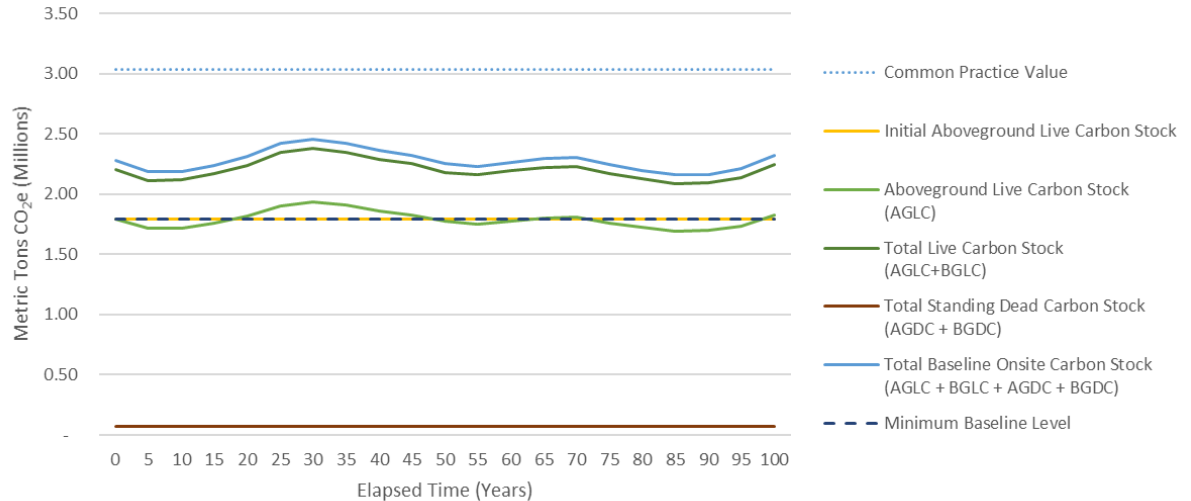
responsible forest management and, as such, is fully compliant with the easement encumbering the project area. This management style could generally be characterized as even-aged management achieved through natural regeneration. The shelterwood method was used to achieve regeneration if insufficient advance regeneration is present (otherwise the overstory removal method is permitted). Commercial thinning was implemented where warranted.

Treatments modeled in the baseline retained trees of similar species composition as were present prior to harvest. The harvest frequency could be as frequent as every 5 or 10 years, subject to the constraint that a harvest of less than 2,000 board feet per acre will not be permitted. Regeneration assumptions are those coded into the "full establishment model" in use by the Inland Empire variant (no modification to this regeneration model will be made). Legal constraints are described in more detail in Attachment H.

- 27) A summary of the inventory of carbon stocks for each carbon pool, as of the end of the initial reporting period, is as follows:
- A) IFM-1 (Standing Live): 2,257,754.29 tCO<sub>2</sub>e
  - B) IFM-3 (Standing Dead): 72,468.52 tCO<sub>2</sub>e
  - C) Total: (IFM-1 and IFM-3): 2,330,222.81 tCO<sub>2</sub>e
- 28) The 100-year average baseline onsite stocking levels are more or less equal to the onsite carbon stocks at project commencement. Baseline carbon stocks exhibit cyclical behavior commensurate with harvest patterns in the baseline model. Estimates of the baseline onsite carbon stocks are as follows:
- A) Standing Live (IFM-1): 2,205,339.63 tCO<sub>2</sub>e
  - B) Standing Dead (IFM-3): 72,468.52 tCO<sub>2</sub>e
  - C) Total (IFM-1 and IFM-3): 2,277,808.15 tCO<sub>2</sub>e
- 29) Baseline onsite carbon stocks are portrayed in a graph below. In the below graph, "AG" means aboveground, "BG" means belowground, "LC" refers to live onsite carbon stocks and "DC" refers to dead onsite carbon stocks (e.g., "BGDC" refers to dead belowground onsite carbon stocks). Annual changes in baseline carbon stocks over time can be explained by the following:
- A) The minimum baseline level was set equal to the initial aboveground live carbon stock through application of Section 5.2.1(d) of the FOP. (This is why the Initial Aboveground Live Carbon Stock and the Minimum Baseline Level are on the same line on the below graph.)
  - B) The baseline was modeled with a net present value maximization objective at a 6% discount rate, with the following constraints:<sup>2</sup>
    - 1) Average aboveground live carbon stock, over the 100-year modeling period, could not fall below the minimum baseline level (in practice, the average aboveground live carbon stock sat just above the minimum baseline level).
    - 2) Harvest volume (in units of green tons) could not increase or decrease by than 5% (in absolute terms) between 5-year time-steps.
  - C) The result was a harvest schedule that provided a high financial return while still being operationally feasible. Onsite carbon stocks exhibit a cyclical pattern, reflecting "waves" of higher harvest levels during periods in which a larger quantity of volume becomes available for harvest.

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<sup>2</sup> More detail regarding the cost/revenue assumptions and discount rate used for the net present value calculation can be found in Attachment L.



An estimate of carbon that will be stored long-term in harvested wood products in the baseline is provided in Attachment I.

- 30) The project's reversal risk rating is calculated at 17.59%.
- 31) The project is not being implemented and conducted as the result of any law, statute, regulation, court order, or other legally binding mandate.
- 32) None of the GHG emission reductions associated with land within the project area have ever been
  - A) Listed or registered by another registry or program for the purpose of greenhouse gas mitigation or reduction goals, whether in a voluntary or regulatory context,
  - B) Credited or claimed by another registry or program for the purpose of greenhouse gas mitigation or reduction goals, whether in a voluntary or regulatory context, and/or
  - C) Sold to a third party prior to listing.
- 33) The project is not transitioning to the Compliance Offset Protocol U.S. Forest Projects, after previously being listed as an early action offset project.

## LISTING INFORMATION REQUIRED FOR IFM PROJECTS ON PRIVATE LANDS

- a) The following is provided:
  - 1) Documentation demonstrating that the project area has greater than 10 percent canopy cover is annexed to this document as Attachment F.
  - 2) A determination of how the forest project's initial above-ground standing live tree carbon stocks compare to common practice, as required in subchapter 5.2.1 of the FOP, is provided as follows:
    - A) To determine the initial above-ground standing live tree carbon stocks, the forest carbon inventory that represented the condition of the project area as of the end of the reporting period (referred to as the "adjusted end-of-reporting-period inventory")<sup>3</sup> was back-dated to the offset project commencement date using the following process:
      - 1) All standing live trees in the forest carbon inventory were grown forward one cycle.<sup>4</sup>
      - 2) The as-inventoried and grown-forward tree data were used to calculate annualized diameter and total-height increments for all standing live trees in the forest carbon inventory by dividing the

<sup>3</sup> The adjusted end-of-reporting-period inventory was used as the input to this process to ensure methodological consistency across the board, given that harvest operations were ongoing during the forest carbon inventory measurement campaign.

<sup>4</sup> A 10-year cycle length was used for this process, for consistency with the process that will be used to update actual onsite carbon stocks.



difference between the grown-forward value and the as-measured value by the number of years in the cycle.

- 3) The annualized increments described above were subtracted from the as-inventoried diameter and total height, respectively, for each standing live tree to determine the condition of each standing live tree as of the start of the 2021 growing season, which equates to the offset project commencement date. (No adjustments were made to inventoried standing dead trees to project them backward to the offset project commencement date.)
- 4) Carbon stocking (differentiated by carbon pool as required) was calculated using the treelist generated through application of the above step (3). This calculation is referred to as the “unadjusted” carbon stocking.
- 5) Because there is an active timber management program on the project area, a certain number of sample points (SPs) were impacted by timber harvest operations, and we presume these operations removed at least some trees that would otherwise have been measured in the forest carbon inventory. For such SPs, it was not necessarily practical to determine whether any impacts occurred during the reporting period,<sup>5</sup> let alone to estimate which trees were removed in a justifiable and/or verifiable fashion. Therefore, the amount of carbon harvested during the reporting period was added to the “unadjusted” carbon stocking, as determined through application of the above step (4), to determine carbon stocking as of the offset project commencement date. To calculate the amount of carbon harvested during the reporting period (differentiated by carbon pool as required),
  - (a) The number of green tons harvested off the project area during the reporting period was determined.
  - (b) A ratio was calculated with total (aboveground and belowground) standing live biomass in the dividend and green tons (in the merchantable stem) in the divisor, using all merchantable trees<sup>6</sup> in the end-of-reporting-period inventory. This ratio was multiplied by the number of green tons harvested during the reporting period to determine the amount of total standing live biomass harvested during the reporting period. The amount of total standing live biomass harvested during the reporting period was then reduced by the ratio of aboveground live biomass to total live biomass in the end-of-reporting-period inventory. The amount of above-ground standing live biomass harvested during the reporting period was added to the above-ground standing live carbon stocking as calculated using the back-dated inventory derived following the above steps (1)-(3) to determine initial above-ground standing live carbon stocks.
- B) The initial above-ground standing live tree carbon stocks, as calculated following the process described above, are below common practice.
- 3) Since the initial above-ground standing live tree carbon stocks are below common practice, an affidavit testifying that the inventory depicted over the past 10 years (used to determine the high stocking reference for the project area) is reasonably accurate, along with a summary of volume harvested over the past 10 years, is annexed to this document as Attachment K.
- 4) A description of how the growth and harvesting regime assumed for the baseline is financially feasible following the requirements of subchapter 5.2.1 of the FOP is annexed to this document as Attachment L.
- 5) Identification of the following factors associated with development of the project’s baseline is provided:
  - A) Weighted common practice value associated with the project area: 42.29 tCO<sub>2</sub>e/ac
  - B) Minimum baseline level (MBL) for the project area: 24.91 tCO<sub>2</sub>e/ac
  - C) WCS per acre for all forest owner(s) (and affiliate) landholdings within the same logical management unit as the project area, as calculated using inventory data: 24.91 tCO<sub>2</sub>e/ac

## OFFSET PROJECT DATA REPORT INFORMATION

<sup>5</sup> This determination was made particularly difficult because the offset project commencement date fell within the winter harvesting season.

<sup>6</sup> I.e., trees of merchantable species with a diameter of at least 4.0 inches.

## REQUIRED FOR ALL PROJECTS

- a) The following is provided:
- 1) Offset project name: See Part (a)(1) under "Listing Information Required for All Projects".
  - 2) ARB project ID number: See the cover page.
  - 3) Offset project type: See Part (a)(2) under "Listing Information Required for All Projects".
  - 4) Contact information, including name, phone number, mailing address, physical address (if different from mailing address) and email address for the OPO, APD (if applicable), the person submitting the information and any technical consultants: See Part (a)(3) under "Listing Information Required for All Projects".
  - 5) CITSS ID number for the OPO and APD (if applicable): See Part (a)(4) under "Listing Information Required for All Projects".
  - 6) Date OPDR completed: See the cover page.
  - 7) Reporting period start and end dates: These are the dates specified in Part (a)(17) under "Listing Information Required for All Projects".
  - 8) 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: 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.
  - 9) The information submitted for project listing is not, in its entirety, still accurate. Updates to information that is no longer accurate is provided below.
    - A) Total project acreage in Part (V) has changed from "Approximately 80,851 acres" to approximately 71,865 acres, as result of removing areas burned by wildfire from the project area.
    - B) In addition to the effects of the area change described above, improvements were made to the process for the determination of within which assessment areas the project lies and the calculation of area within each such assessment area (Part V); updated data are below.
      - 1) Bitterroot Mixed Conifer: 167.97 acres.
      - 2) Northern Rockies Mixed Conifer: 68,828.68 acres.
      - 3) Northern Rockies Spruce / Fir: 335.76 acres.
      - 4) Northern Rockies Subalpine Mixed Conifer: 2,532.20 acres.
      - 5) The total project area acreage is approximately 71,864.61 acres.
    - C) The description of "how the Project Area was determined" in Part V now should read: "The Project Area consists of all forest land owned by the OPO that (1) is accessible to commercial timber harvest, (2) is encumbered by a certain easement (referred to as the Thompson-Fisher conservation easement by the OPO), (3) lies to the south of Highway 2, (4) does not have a higher and better use, according to the OPO's assessment, and (5) was not impacted in the recent past by certain wildfires.
    - D) The description of "forest vegetation types within the Project Area boundary" has been made more comprehensive and now should read as follows: "The following forest vegetation types predominate within the Project Area boundary, according to the Montana Land Cover (MTLC) 2021 V1 dataset: Harvested forest-grass regeneration; Harvested forest-shrub regeneration; Harvested forest-tree regeneration; Northern Rocky Mountain Lower Montane Riparian Woodland and Shrubland; Recently burned forest; Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest; Rocky Mountain Lodgepole Pine Forest; Rocky Mountain Mesic Montane Mixed Conifer Forest; Rocky Mountain Montane-Foothill Deciduous Shrubland; Rocky Mountain Ponderosa Pine Woodland and Savanna; Rocky Mountain Subalpine Deciduous Shrubland and Western Larch Savanna."
    - E) The summary of the inventory of carbon stocks for each carbon pool, as of the end of the initial reporting period, has been updated as follows:
      - 1) IFM-1 (Standing Live): 2,257,754.29 tCO<sub>2e</sub>
      - 2) IFM-3 (Standing Dead): 72,468.52 tCO<sub>2e</sub>
    - F) The "calculation of the offset project's reversal risk rating and expected contribution to the Forest Buffer Account" has been corrected to 17.59%.
    - G) Estimates of the baseline onsite carbon stocks have been updated to the following.
      - 1) Standing Live (IFM-1): 2,205,339.63 tCO<sub>2e</sub>

- 2) Standing Dead (IFM-3): 72,468.52 tCO<sub>2</sub>e
- 3) Total (IFM-1 and IFM-3): 2,277,808.15 tCO<sub>2</sub>e
- H) The estimate of carbon stored long-term in harvested wood products each year in the baseline has been updated to the quantities reported in Attachment I.
- I) The project's reversal risk rating is calculated at 17.59%.
- J) The calculation of factors associated with development of the project's baseline has been updated to the following:
  - 1) Weighted common practice value associated with the project area: 42.91 tCO<sub>2</sub>e/ac
  - 2) Minimum baseline level (MBL) for the project area: 24.91 tCO<sub>2</sub>e/ac
  - 3) WCS per acre for all forest owner(s) (and affiliate) landholdings within the same logical management unit as the project area, as calculated using inventory data: 24.91 tCO<sub>2</sub>e/ac
- K) Data in Attachments E, F, G, H, I, J, K and L has been updated; updated data may be found in the attachments of the same names which are annexed to the initial OPDR.
- 10) Updated estimates of the project area's carbon stocks for each of the required carbon pools, reflecting the appropriate confidence deduction as determined by appendix A of the FOP, is as follows.
  - 1) Standing Live (IFM-1): 2,237,434.50 tCO<sub>2</sub>e
  - 2) Standing Dead (IFM-3): 71,816.31 tCO<sub>2</sub>e
  - 3) Total (IFM-1 and IFM-3): 2,309,250.81 tCO<sub>2</sub>e
- 11) The appropriate confidence deduction for the forest carbon inventory, following the requirements and methods in appendix A of the FOP, is 0.9%.
- 12) An explanation of any decrease over any 10 consecutive year period in the standing live tree carbon pool: Not applicable; a 10 consecutive year period has not elapsed since offset project commencement.
- 13) Any changes in the status of the forest owner(s) including, if applicable per subchapter 3.1, the acquisition of new forest landholdings: no changes in the status of the OPO have occurred since the end of the initial reporting period.
- 14) A description of how the project meets, or will meet, the natural forest management criteria (refer to table 3.1), including progress on criteria that have not been fully met in previous reporting periods, is annexed to this document as Attachment G.
- 15) An estimate of reporting period harvest volumes (may be reported in tCO<sub>2</sub>e or tCO<sub>2</sub>e/acre as appropriate) and associated carbon in harvested wood products is as follows:
  - A) Actual Carbon Delivered to Mill: 5,821.60 tCO<sub>2</sub>e
  - B) Harvested Wood Products In-Use (IFM-7): 6,759.81 tCO<sub>2</sub>e
  - C) Harvested Wood Products In Landfills (IFM-8): 4,483.68 tCO<sub>2</sub>e
  - D) Harvested Wood Products Total (IFM-7 and IFM-8): 11,243.49 tCO<sub>2</sub>e
- 16) The estimated mill efficiency, as determined following the method in appendix C, is 0.704 (this mill efficiency is applicable to both sawlog and pulpwood material; no hardwood species were harvested during the reporting period).
- 17) The baseline carbon stock estimates for all required carbon pools for the reporting period, as determined following the requirements in chapter 5 and approved at the time of the project's initial verification, are as follows:
  - A) Standing Live (IFM-1): 2,205,339.63 tCO<sub>2</sub>e
  - B) Standing Dead (IFM-3): 72,468.52 tCO<sub>2</sub>e
  - C) Harvested Wood Products In-Use (IFM-7): 15,084.25 tCO<sub>2</sub>e
  - D) Harvested Wood Products In Landfills (IFM-8): 10,452.17 tCO<sub>2</sub>e
  - E) Harvested Wood Products Total (IFM-7 and IFM-8): 25,536.42 tCO<sub>2</sub>e
- 18) Secondary effects, following calculation steps and/or factors provided in chapter 5 of the FOP, is estimated at -12,272.05 tCO<sub>2</sub>e.
- 19) This item left intentionally blank.
- 20) The total net GHG emission reductions and GHG removal enhancements (QRy in equation 5.1) for the reporting period has been calculated, following the requirements in chapter 5, at 7,736.00 tCO<sub>2</sub>e, calculated as follows.

Calc Row	Onsite Carbon Stocks	Start Date	Reporting Period Beginning Date	10-Feb-21
		10-Feb-21	Reporting Period End Date	31-Mar-22
1	Sampled Onsite Carbon Stocks (tonnes CO2e)	2,276,088.11		2,330,222.81
2	Annual Carbon Stock Change (tonnes CO2e)			54,134.70
3	Cumulative Carbon Stock Change (tonnes CO2e)			54,134.70
4	Confidence Deduction (percent)			0.9%
5	Adjusted Sampled Onsite Carbon Stocks (adjusted for confidence deduction) (tonnes CO2e)	2,255,603		2,309,250.81
6	Soil Carbon Emissions			-
7	Increment in Actual Onsite Carbon Stocks (tonnes CO2e)			2,309,250.81
8	Baseline Onsite Carbon Stocks (tonnes CO2e)			2,277,808.15
9	Increment in Baseline Onsite Carbon Stocks (tonnes CO2e)			2,277,808.15
10	Quantified GHG Reductions / Removals for Onsite Carbon Stocks (tonnes CO2e)			31,442.66
	<b>Accounting for Wood Products Including Market Effects and Leakage</b>			
11	Actual Carbon in Trees Harvested for Wood Products in (tonnes CO2e)			42,732.04
12	Baseline Carbon in Trees Harvested for Wood Products (tonnes CO2e)			104,092.27
13	Actual Carbon Stored Long-term in Wood Products (tonnes CO2e) - Excl Landfill			6,759.81
14	Actual Carbon Stored Long-term in Wood Products (tonnes CO2e) - Incl Landfill			11,243.49
15	Baseline Carbon Stored Long-term in Wood Products (tonnes CO2e) - Excl Landfill			15,084.25
16	Baseline Carbon Stored Long-term in Wood Products (tonnes CO2e) - Incl Landfill			25,536.42
17	Difference in Actual and Baseline Carbon Stored in Wood Products (tonnes CO2e) - Landfill Adj			(14,292.93)
18	GHG Reductions / Removals for Carbon Stored in Wood Products (tonnes CO2e) w/ mkt response			(11,434.35)
	<b>Accounting for Secondary Effects</b>			
19	Difference Between Actual and Baseline Carbon in Trees Harvested for Wood Products (tonnes CO2e)			(61,360.23)
20	Other Secondary Effects Emissions (shifting activities/materials) IFM Projects (tonnes CO2e)			(12,272.05)
	<b>Quantified GHG Reductions and Removals</b>			
21	Annual GHG Reductions/Removals Net of Discounts and Secondary Effects (tonnes CO2e)			7,736.27
22	Cumulative GHG Reductions/Removals; not incl.neg. carryover or reversals (tonnes CO2e)			-
23	Cumulative Negative Carryover from Prior Year (tonnes CO2e)			-
24	Credits Issued - Net of Negative Carryover, bef. Buffer or adjust for Reversals (tonnes CO2e)			7,736.00

- 21) A reversal has not occurred during the previous reporting period.
- 22) The project's reversal ranking is 17.59%.
- 23) The offset project's forest buffer account contribution has been calculated at 1,361.00 ARB offset credits.
- 24) The following information has been provided in the named attachments annexed to this document:

- A) Projections of baseline and actual harvesting volumes from the project area over 100 years are provided in Attachment I.
- B) This item left intentionally blank.
- C) The complete carbon inventory methodology that meets the requirements of appendix A of the FOP is provided as Attachment C.
- D) The complete modeling plan methodology that meets the requirements of appendix B of the FOP is provided as Attachment B.
- E) The final baseline incorporating all required carbon pools portrayed in a graph depicting time (100 years) in the x-axis and metric tons CO<sub>2</sub>e in the y-axis, supported with written characterizations that explain any annual changes in baseline carbon stocks over time, are provided as Attachment J.