American Carbon Registry (ACR)

Coastal Edge IFM Project

Project Validation and Verification Report

Offset Project Name	Coastal Edge IFM
ACR Project ID	ACR 821
American Carbon Registry Standard	ACR Standard v8.0
Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands	Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from Improved Forest Management on Non-Federal U.S. Forestland v2.0
Reporting Period:	26 October 2021 – 1 August 2023
Aster Global Project Number:	23073.50
Report Date:	V2.3: 25 February 2025

Project Proponent:	**Technical Consultant:**
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Offset Project Consultant:	**Offset Verification Body:**
Name: The Climate Trust **Contact:** Madeline Montague **Phone:** 503-238-1915 x200	**Name:** Aster Global Environmental Services, Inc. **Contact:** Mansfield Fisher

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1 Executive Summary

Aster Global Environmental Solutions, Inc. (Aster Global) prepared this validation /verification report in accordance with the outlined requirements of the American Carbon Registry's (ACR) Standard. Aster Global presents validation and verification findings of the *Coastal Edge IFM Project* (hereafter, referred to as "*Project*") – prepared by North Coast Land Conservancy Inc. (hereafter referred to as "*Project Proponent*"). The project validation and verification was conducted as part of ACR's program requirements for GHG offset projects. Please note that the project proponent/developer is responsible for the preparation and fair presentation of the GHG statement in accordance with the ACR criteria and that Aster Global as the VVB is responsible for expressing an opinion on the GHG statement based on the validation and verification process.

By ACR definition, the project is considered an Improved Forest Management (IFM) project. Project lands are located within Clatsop County, Oregon. As stated in Section A3 of the GHG Plan, the project uses Improved Forest Management owners for the purpose of increasing carbon storage, improving water quality, and protecting and enhancing biodiversity and wildlife habitat.

The GHG Project Plan validation and implementation verification included carbon sequestered through IFM on approximately 3,291 acres. The project asserts emission reductions/removals of 183,881 MtCO2e for the reporting period (10/26/2021 – 08/01/2023).

The validation/verification objective included an assessment of the likelihood that implementation of the planned GHG project would result in the GHG emission removal/ enhancements as stated by the project developer (ISO 14064-3: 2019). The objective was to ensure that the project was in compliance with the ACR Standard the ACR Validation and Verification Standard, and the selected methodology criteria. Aster Global assessed the GHG emission reductions/removals of the IFM project.

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

The GHG assertion provided by the *Project Proponent* and verified by Aster Global has resulted in the GHG emission reductions/removal of 183,881 MtCO2 equivalents by the project during the verification period/reporting period (10/26/2021 – 08/01/2023).

2 Introduction

This validation /verification report is prepared in accordance with the outlined requirements of the American Carbon Registry's (ACR) Standard. Aster Global presents validation and verification findings of the *Project* – prepared by the *Project Proponent*. The project validation and verification was conducted as part of ACR's program requirements for GHG offset projects (Improved Forest

Management). Aster Global is accredited by the ANSI National Accreditation Board (ANAB) under ISO14065:2019 for greenhouse gas validation and verification bodies including ISO 14064-3:2019, ISO 14065:2020 and validation/verification of assertions at the project level for Land Use and Forestry (Group 3) and is approved to validate/verify for ACR.

The GHG Project Plan validation and implementation verification included carbon sequestered through IFM on one contiguous tract (approximately 3,291 acres). The project asserts emission reductions/removals of 183,881 MtCO2e for the reporting period (10/26/2021 – 08/01/2023).

2.1 Contact Information – Roles and Responsibilities

Project Owner / Project Proponent:	**Name:** North Coast Land Conservancy **Contact:** Jon Wickersham **Phone:** 503-738-9126 **Email:** jonw@nclctrust.org **Mailing Address:** P.O. Box 67, 2609 N Roosevelt Dr., Seaside, OR 9713
Accredited V/V Body: Aster Global Environmental Solutions, Inc.	Aster Global Environmental Solutions, Inc. 3800 Clermont St NW North Lawrence, Ohio 44666

Validation/Verification Team – Roles, Responsibilities, and Contact Information:

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2.2 Project Description

By ACR definition, the *Project* is considered an Improved Forest Management (IFM) project. Project lands are located entirely within Clatsop County, Oregon. As stated in Section A3 of the GHG Plan, the project uses Improved Forest Management owners for the purpose of increasing carbon storage, improving water quality, and protecting and enhancing biodiversity and wildlife habitat. The baseline scenario represents a commercial harvest regime typical of private landowners in the region and targeted to maximize net present value at a 6% discount rate as specified in the Methodology. The project scenario entails restoring forest structures and habitat associated with late-seral, or "old-growth" forests. Forest management will generally consist of 1) pre-commercial thinning in young overstocked stands to improve vigor; 2) gap and variable density thinning in older stands (40-60 yr) to emulate natural small-scale disturbances that provide early-successional habitat patches within a mosaic of older forest stands and riparian areas; and 3) limited felling operations in steep riparian areas with an eye towards improving stream habitat and water quality.

2.3 Objective

The GHG Project Plan validation objective included an assessment of the likelihood that implementation of the planned GHG project would result in the GHG emission removal/ enhancements as stated by the project developer (ISO 14064-3: 2019). The verification objective was to ensure that the project was in compliance with the ACR Standard, selected methodology, and the ACR Verification Standard criteria. Aster Global assessed the GHG emission reductions/removals of the IFM project.

2.4 Criteria

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

These documents included:

- *ACR Carbon Registry Standard (v8.0)*
- *ACR Validation and Verification Standard (v1.1)*
- *Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals for Improved Forest Management (IFM) on Non-Federal U.S. Forestlands (Version 2.0)*
- *Errata and Clarifications Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands v2.0 (August 2024)*

- *Aggregation and Programmatic Development Approach Guidance for Improved Forest Management (v1.0)*
- *ACR Reversal Risk Analysis and Buffer Pool Contribution Determination (v1.0)*
- *ACR SDG Contributions Reporting Tool (v1.0)*
- *ACR Required Templates*

2.5 Scope

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

Baseline Scenario	The baseline scenario is based on forestry practices of a private industrial landowner within the region designed to maximize the NPV of revenue from the sale of woods products at 6% interest rate.
Activities/Technologies/Processes	Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands version 2.0 Additionally, the Project is applying a Programmatic Development Approach.
Sources/sinks/Reservoirs	Aboveground live biomass carbon (Included) Belowground live biomass carbon (Included) Aboveground standing dead wood (Included) Belowground standing dead wood (Included) Lying dead wood (Excluded) Harvested wood products (Included) Litter/Forest floor (Excluded) Soil organic carbon (Excluded) Emissions from biomass burning (Excluded) Activity Shifting Leakage (Excluded) Market Leakage (Included)
GHG Type	CO_2
Project Location	Clatsop County, Oregon
Project Boundary and Time Period	The Project Boundary is approximately 3,291 acres in Clatsop County, Oregon. Time Period: Start Date: 26 October 2021 Reporting Period: 26 October 2021 – 01 August 2023 Crediting Period: 26 October 2021 – 25 October 2041

2.6 Level of Assurance

The level of assurance was used to determine the depth of detail that the validator/verifier (Aster Global) placed in the validation and verification plan to determine if there are any errors, omissions, or misrepresentations (ISO 14064-3:2019). Aster Global selected samples of data and information to be verified to provide *reasonable* assurance and to meet the materiality requirements of the project (ACR Validation and Verification Standard). ACR considers verification to be a risk-based process where the verifier examines a sufficient amount of data and uses the verifier's professional judgment to provide a *reasonable* assurance.

2.7 Materiality

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

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

For this Monitoring Period, the calculation is as follows:

Materiality Threshold	
Contributions to Offset Materiality by Type ($mTCO_2e$):	
Total reported GHG Emission Reductions	183,881
Project Emission Reduction Assertion	183,881
Verifier Emission Reduction Assertion	183,881
[(183,881– 183,881)/ 183,881] *100	0.00%
% Error	0.00%

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

A quantitative uncertainty assessment was performed as required by ACR. This involved an examination by the audit team where reported uncertainty typically specifies a quantitative estimate of the likely difference between or dispersion among reported values, and a qualitative

description of the likely causes of said differences. The major sources of quantitative uncertainty assessed by the audit team included:

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

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

Related to the uncertainty assessment, the audit team also evaluated; "whether the data and information supporting the GHG assertion were based on assumptions and industry defaults, future projections, and/or actual historical records" (ACR Validation and Verification Standard v. 1.1 Chapter 12). The *Project's* GHG assertion relies on a combination of data types which include a combination of historical, projected/modeled data which implicitly utilizes both assumptions and industry defaults, and industry defaults. It was determined that the project data and information supporting GHG assertions were of high quality. The project was confirmed to have adopted a sensible and appropriate approach to grow forward the inventory. Industry defaults were in line with the audit team's expectations (e.g., CO_2 to Carbon biomass conversion factor of 3.664) and approved IFM methodology.

2.8 Validation and Verification Body's QA/QC System

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

3 Validation Process, Evidence-gathering and Findings

3.1 Validation Process

The validation process closely followed the guidance provided by The American Carbon Registry, Standard the ACR Validation and Verification Standard, ISO 14064-3:2019, ISO 14065:2020, and ISO/IEC 17029, and the Aster Global Management System and Management System Manual.

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

The following sections provide a description of the validation evidence-gathering procedures used to assess the GHG statement for the project.

3.2 GHG Project Plan

The *Project's* GHG Plan was found to be in compliance with ACR's Standard.

3.2.1 ACR Standard Requirements/Eligibility

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

- The Project start date is October 26, 2021 and was validated within 3 years of this date.
- The *Project Proponent* commits to a minimum project term of 40 years, meeting the ACR project term requirement.
- The Crediting Period is defined as 20 years, meeting the requirements of ACR Standard.
- Offsets are real and ex-post.
- Ownership of offsets is clear.
- Ownership titling of land is clear.
- The *Project* is additional as described in Section 4.6.2 of this Report.
- The *Project* has maintained regulatory compliance.
- The *Project* has appropriately applied the ACR Tool for Risk Analysis and Buffer Determination (v1.0).
- The *Project* has appropriately accounted for market leakage in line with the selected methodology as described in Section 4.6.4 of this Report.
- The *Project* has been independently validated and verified by Aster Global.
- The *Project* has appropriately identified community and environmental impacts as described in Section 4.6.6 of this Report.

3.2.2 Approved Methodology

The project utilized the following methodology and tools: Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands, version 2.0, and the ACR Tool for Risk Analysis and Buffer Determination, version 1.0.

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

- The *Project* occurs on non-federal U.S. forestlands.
- The project area is able to be harvested by the *Project Proponent*.
- There is clear title to land and timber rights.
- There is clear title to offsets.
- The *Project* demonstrates an increase in onsite stocking levels above the baseline scenario by the end of the crediting period.
- The *Project* area meets the definition of Forestland.
- The *Project* does not use non-native species where adequately stocked native stands were converted for forestry and other land uses.
- The *Project* does not include the manipulation of water tables or filling of wetlands.

3.3 Validation Findings and Conclusions/Opinions

During initial validation, the Aster Global team identified non-conformity reports (NCRs) and clarifications (CL). All were addressed satisfactorily by the *Project Proponent* during the project validation process. These NCRs and CLs provided needed clarity to ensure that the GHG Project Plan was in compliance with the ACR Standard v8.0. Through a comprehensive set of data checks Aster Global assessed the *Project's* compliance with methodological equations and computational approach for uncertainty. Aster Global examined and is reasonably assured the *Project* complies with the detailed requirements of the methodology for the baseline and project scenarios and overall project computations.

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

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

4 Verification Process, Evidence Gathering and Findings, and Conclusions

The verification process closely followed the guidance provided by ACR Standard, the Validation and Verification Standard, ISO14064-3:2019, ISO 14065:2020, and ISO/IEC 17029. The Aster Global Management System and Management System Manual, Section V.

Verification included an assessment of the accuracy of the claimed GHG emission reductions/removals and assessment the Project's compliance with ACR's normative documents including the ACR Standard and selected methodology. Specifically, the project verification included the review of the requirements outlined in the ACR Standard. The assessment included the following items: eligibility criteria, baseline approach, additionality, project boundary, emissions, leakage, quantification of GHG reductions/removals, monitoring, data and parameters, and adherence to the project-level principals (relevance, completeness, consistency, accuracy, transparency, conservativeness).

Aster Global's verification was generally broken down into four parts: desktop assessment, site visit, quantitative review, and meetings/interviews. Each section relates to specific evidence gathering activities to ensure the validation/verification team minimized risk and was able to confirm GHG assertions to a reasonable level of assurance.

4.1 Desktop Assessment

Aster Global reviewed the Project Plan to assess conformance with the requirements of the ACR Standard. Key factors that impacted the reported emissions reductions were identified, and an Evidence Gathering Plan was created to focus on the critical elements presenting potential risk for errors in reported data. These elements included but are not limited to the following:

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

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

4.2 Site Visit

Following the initial desk review, Aster Global conducted an on-site assessment of the project lands on 23-26 October 2023. The site visit was used to review project records with representatives of the *Project Proponent*, discuss the calculation of carbon pools and sinks, visit portions of the ownership for reconnaissance and ground-truth of the submitted data, and monitoring approach. Furthermore, throughout the site visit Aster Global conducted information interviews with the *Project Proponent* including but not limited to the baseline scenario, common practice, ownership, etc. The site visit also included in the remeasurement of a sample of the *Project's* forest inventory plots.

Aster Global applied Equation 21 of the methodology to determine the number of plots required for resampling. The *Project*'s inventory included 133 plots across all three strata included by the *Project*. Applying Equation 21 of the methodology results in a minimum of approximately 11.5 plots for resample and during the site visit Aster Global remeasured 12 plots.

During the site visit the VVB independently reproduced approximately 9% of the original inventoried plots (12 plots total). The plots selected for reproduction and visited were:

Plot Count	Plot	Stratum
1	311	HIGH
2	361	HIGH
3	310	HIGH
4	343	HIGH
5	370	HIGH
6	339	HIGH
7	344	HIGH
8	226	MED
9	252	MED
10	228	MED
11	201	MED
12	223	MED

Field review included the following aspects:

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

The plot remeasurements made by Aster Global were utilized to calculate carbon on the applicable pools. This was compared to the project's carbon stocks in a paired two sample t-test for means.

The t-test provided evidence that the mean carbon stocking value produced by the *Project Proponent* on the twelve (12) sample plots was not statistically dissimilar to the mean carbon stocking value produced by Aster Global on the same plots. The entirety of the site visit paired with the desk review provided reasonable assurance that the carbon inventory was implemented in an acceptable and accurate manner.

4.3 Quantitative Review

Aster Global focused on the quantitative analyses undertaken by the *Project Proponent* to assess the carbon pools accounted for by the project (above-ground biomass, below-ground biomass, standing dead wood, and harvested wood products). Aster Global's review included an assessment of the primary quantitative data supporting the GHG assertion including the direct sampling of biomass carbon and the use of modeling, as well as the project proponents use of allometric methods and equations for calculating tree biomass, and the calculation of ERTs. Throughout the validation/verification, Aster Global utilized a series of evidence gathering techniques including but not limited to the development of a set of independent data checks, meetings and interviews with the *Project Proponent*, cross-checking of information against evidence provided by the *Project Proponent* and/or evidence collected independently by Aster Global, review of remote sensing analyses, and review of the *Project's* documentation against the ACR Program normative documents for IFM projects.

4.4 Meetings/Interviews

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

Date	Attendees	Topics Discussed
28 September 2023	The Climate Trust: Madeline Montague, Pawan Guatam Aster Global: Mansfield Fisher, Justin Ziegler	Opening Meeting
20 November 2023	The Climate Trust: Madeline Montague, Pawan Guatam Aster Global: Ashley Laux, Justin Ziegler	Calculation Walkthrough
12 July 2024	The Climate Trust: Madeline Montague, Pawan Guatam Aster Global: Mansfield Fisher, Justin Ziegler, Caris Lyons	Round 2 Findings Call
19 August 2024	The Climate Trust: Madeline Montague, Pawan Guatam	Round 3 Findings Call

	Aster Global: Mansfield Fisher, Justin Ziegler, Caris Lyons, Ashley Laux	
09 October 2024	The Climate Trust: Madeline Montague Aster Global: Mansfield Fisher, Ashley Laux	Closing Meeting

4.5 Verification Milestones

Project/Verification Activity	Date
Aster Global Internal Conflict of Interest (COI) process completed and approved (no issues).	7 September 2023
ACR approval of ACR-Specific COI Form	22 September 2023
Submission of the Validation/Verification Audit Plan to *Project Proponent* for approval	5 October 2023 (Signed 9 October 2023)
Opening meeting with *Project Proponent*	28 September 2023
Field Verification	23 October 2023- 27 October 2023
Round 1 - Corrective actions/clarification submitted	06 January 2024
Project Responds to Corrective actions/clarifications	01 April 2024
Round 2 - Corrective actions/clarification submitted	25 June 2024
Project Responds to Corrective actions/clarifications	05 August 2024
Round 3 - Corrective actions/clarification submitted	16 August 2024
Project Responds to Corrective actions/clarifications	27 August 2024
Round 4 - Corrective actions/clarification submitted	27 September 2024
Project Responds to Corrective actions/clarifications	30 September 2024
Aster Global completes Review	04 October 2024
Aster Global finalizes report and submits to ACR and *Project Proponent*	10 October 2024

4.6 ACR Forest Carbon Project Standard Requirements

4.6.1 Eligibility Requirements

The *Project* is an IFM project that is intended to create additional carbon stocks in the project area by limiting timber harvesting and maintaining mature forest cover. The *Project* is in compliance with ACR's Standard v8.0. Specific details are located in the Validation portion of this report.

4.6.2 Additionality

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

The *Project* demonstrated that the project activity is not required by any law and the project activity exceeds currently effective and enforced laws and regulations.

As required by the selected methodology, the *Project* demonstrated that the project activity exceeds common practice in the forestry sector for the defined geographic region. Section 2.4 of the of the methodology requires that projects evaluate the predominant forest management practices of the region and demonstrate that the management activities of with-project scenario will increase carbon sequestration compared to common practice through a three-step process. As described in Section C2 of the GHG Plan, the Project appropriately describes the predominant forest management practices occurring on comparable sites of the region that have not been enrolled in a carbon offset project. While not required by the methodology, the methodology suggests that Project's should consider forest type, ecological condition, and species/product mixture. After a review of the GHG Plan, supporting evidence provided by the *Project*, and evidence collected independently by Aster Global, Aster Global is reasonably assured that the *Project* has appropriately defined comparable sites through the definition of the geographic area, forest type, and ecological condition and appropriately described the predominant forest management practices on these comparable sites. Similarly, the *Project* has provided an appropriate descriptive comparison of the expected carbon sequestration impacts of predominant forest management practice identified in the first step in relation to the with-project scenario management and demonstrated that the carbon stocks under the with-project scenario management will exceed those of the baseline scenario by the end of the crediting period.

Through an NPV analysis the *Project* has appropriately demonstrated that the *Project* faces a financial barrier.

4.6.3 Permanence and Risk Mitigation

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

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

4.6.4 Baseline and Leakage

As described in Section E1 of the GHG Plan, the baseline harvest scenario was modeled as a constrained NPV optimization, with the timing of harvests determined through NPV optimization and the number of acres harvested annually set at a feasible and plausible level for the region. Baseline harvests were scheduled according to spatial constraints under the Oregon Forest Practices Act and further, conservatively, limited by common practice in the region.

The *Project Proponent* accounted for market leakage by applying a default market leakage discount factor of 30%, per the methodology requirements. The calculation of this default market leakage discount factor of 30% was confirmed by Aster Global.

4.6.5 Monitoring

Aster Global confirmed the appropriateness and implementation of the project monitoring plan, which details monitored data and parameters, measurements, timing, and data storage procedures.

4.6.6 Community and Environmental Impacts

Aster Global confirms the *Project* adheres to the environmental and community safeguards best practices as stated in the ACR Standard and that the project has appropriately assessed and disclosed the project's environmental and community impact in line with the ACR Standard and has documented this assessment and disclosure using the required ACR Template (Template for ACR Environmental and Social Impact Assessment) . Furthermore, Aster Global confirms that the *Project* has documented the *Project's* contribution to the Sustainable Development Goals using the appropriate templates.

4.6.7 Stakeholders Comments

As stated in Section F3 of the GHG Plan, the *Project's* stakeholders include recreational users of the project area and downstream residents in the coastal communities of Cannon Beach and Arch Cape. North Coast Land Conservancy (NCLC) will continue to solicit input when their management and access plans undergo periodic review. If a change in management strategy is anticipated, it is NCLC's policy to engage stakeholders or interested parties to assess the impacts these changes may have on user groups. Outreach to these groups is done via email, in-person meetings, community meetings, or other mechanisms as appropriate.

4.6.8 GHG Emissions Reduction and Removal Enhancements (ERTs)

GHG Emission Reductions or Removals	Total	2021 Vintage	2022 Vintage	2023 Vintage
Baseline Emissions / Reductions ($MtCO_2e$)	253,192			
With-project Emissions ($MtCO_2e$)	(23,805)			
Leakage ($MtCO_2e$)	81,077			
Uncertainty Deduction Rate[1]	0%			
Total Emission Reductions/Removals ($MtCO_2e$)	183,881	N/A	44,000	139,881
Buffer Pool Contribution ($MtCO_2e$)[2]	33,099	N/A	7,921	25,178
Net Emission Reductions/Removals ($MtCO_2e$)	150,782	N/A	36,079	114,703
Net Removals ($MtCO_2e$)	7,038	N/A	1,684	5,354
Net Emission Reductions ($MtCO_2e$)	176,843	N/A	42,316	134,527

4.7 Verification Findings

The Aster Global verification team identified non-conformity reports (NCRs) and clarifications (CL). All were addressed satisfactorily by the *Project Proponent* during the project verification process. These NCRs and CLs provided needed clarity to ensure that the project was implemented in accordance with the approved methodology and was in compliance with ACR's Standard.

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

4.8 Verification Results/Conclusions/Opinions

Aster Global confirms all verification activities including objectives, scope and criteria, level of assurance and the project's adherence to the ACR Standard and the validated GHG Project Plan,

[1] Please note that the uncertainty was calculated as ~9.44% in Vintage Year 2022 and ~9.63% in Vintage Year 2023.

[2] Please note that buffer credits will be deposited from another account.

as documented in this report, are complete and concludes without any qualifications or limiting conditions that the Project meets the requirements of ACR's Standard.

The GHG assertion provided by the *Project Proponent* and verified by Aster Global has resulted in the GHG emission removal of 183,881 MtCO2 equivalents by the project during the verification period/reporting period (10/26/2021-08/01/2023).

Submittal Information:

Report Submitted to:	The Climate Trust ACR
Report Submitted by:	Aster Global Environmental Solutions, Inc.
Aster Global Lead Validator/Verifier Name and Signature:	 Mansfield Fisher
Verifier Location	3800 Clermont St. NW North Lawrence, Ohio 44666
Aster Global Internal Reviewer Name and Signature:	 Shawn McMahon
Aster Global President/Technical Director Name and Signature	 Janice McMahon
Date:	25 February 2025

MF/SM/JM/23073.50_Coastal Edge IFM_ACR Val Ver Report V2.3
ACR: PF 02/25/2025F

Appendix A – Aster Global's Validation and Verification Findings

Item Number	1
American Carbon Registry Standard Version 8.0, July 2023 (Section)	2.B.6 Managing Data Quality
American Carbon Registry Standard Version 8.0, July 2023 (Description)	The Project Proponent shall establish and apply quality assurance and quality control (QA/QC) procedures to manage data and information, including activities designed to assess, address, and minimize overall uncertainty. QA/QC procedures shall be outlined in the GHG Project Plan.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section E6
Aster Global Round 1 Findings (15 January 2024)	1. GHG Plan section E6 describes the QA/QC procedures for minimizing overall uncertainty for field data. It is unclear from the GHG Plan if there are additional QA/QC procedures in place for managing data related to qualitative items such as land ownership documents. 2. The VVB noted that the "Coastal Edge_DataManagementSOP.docx" document contains information about data storage that is not present in the GHG Plan.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the findings and ensure all relevant QA/QC procedures are outlined in the GHG Plan.
Round 2 Response from Project Proponent (28 March 2024)	Thank you for pointing this out. We started including the Data Management SOP as supplementary information during verifications on older projects where the GHG Plan did not fully detail all relevant QA/QC procedures. For this project and RP, the Data Management SOP is an unnecessary document. Instead, the information in the Data Management SOP should instead be fully incorporated into the GHG Plan. We have updated GHG Plan section E6 to 1) include procedures for managing qualitative data and 2) contain all other information in the Data Management SOP.
Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification. The VVB reviewed the updated GHG Plan and confirmed that all required elements contained within this criterion are contained within the GHG Plan. This finding is closed.

Item Number	2

American Carbon Registry Standard Version 8.0, July 2023 (Section)	CHAPTER 3: PROJECT ELIGIBILITY REQUIREMENTS
American Carbon Registry Standard Version 8.0, July 2023 (Description)	Regulatory Compliance - Adherence to all national and local laws, regulations, rules, procedures, other legally binding mandates and, where relevant, international conventions and agreements directly related to project activities. GHG projects must maintain regulatory compliance. To do this, a regulatory body/bodies must deem that a GHG project is not out of compliance at any point during a Reporting Period. GHG projects deemed to be out of regulatory compliance are only eligible to earn ERTs during the period of non-compliance in specific circumstances.16
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section A7
Aster Global Round 1 Findings (15 January 2024)	The GHG Plan lists the relevant laws and regulations and states that the project is in compliance with all local, state, and federal laws. The GHG Plan states "A regulatory compliance attestation will be signed and submitted to a verification body at each verification event." However, the VVB has not been able to locate this document.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 2 Response from Project Proponent (28 March 2024)	This attestation is included in the Monitoring Report (Section IX: Required Attestations).
Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification, this finding is closed.

Item Number	3
American Carbon Registry Standard Version 8.0, July 2023 (Section)	5.B.1 AFOLU RISK MITIGATION MECHANISMS

American Carbon Registry Standard Version 8.0, July 2023 (Description)	Project Proponents of AFOLU projects with risk of Reversal shall enter into a legally binding Reversal Risk Mitigation Agreement that details the requirements for reporting and compensating for Unintentional and Intentional Reversals. Should Reversals occur, the requirements and liabilities associated with replacing the Verified Lost Credit Amount rest with the Project Proponent, and not necessarily with the individual landowner(s) or Project Developer Account Holder per the Reversal Risk Mitigation Agreement. If the Project Proponent is not the same entity as the Project Developer Account Holder, the Project Developer Account Holder shall facilitate the replacement of the Verified Lost Credit Amount on the Registry and deliver credits on behalf of the Project Proponent to compensate for the Verified Lost Credit Amount.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan
Aster Global Round 1 Findings (15 January 2024)	The VVB was unable to locate a signed Reversal Risk Mitigation Agreement.
Round 1 NCR/CL/OFI	NCR: Please provide the signed Risk Mitigation Agreement.
Round 2 Response from Project Proponent (28 March 2024)	ACR reached out to project developers via email last August and let us know that they will handle the RMA process directly. ACR will reach out to project proponents for a signed RMA at initiation of ACR's final review prior to RP1 ERT issuance. Please see the provided email for details "The Climate Trust Mail - New ACR RMA_TOU signature collection process.pdf"
Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification, this is in line with the VVB's understanding that the RMA Process is a requirement that the ACR team confirms and does not need to be reviewed by the VVB.

Item Number	4
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.B INFORMATION IN A GHG PROJECT PLAN
American Carbon Registry Standard Version 8.0, July 2023 (Description)	Physical conditions prior to project initiation;
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section A4
Aster Global Round 1 Findings (15 January 2024)	The VVB was unable to locate the physical conditions prior to project initiation in the GHG Plan.
Round 1 NCR/CL/OFI	CL: Please clarify the physical conditions prior to project initiation.
Round 2 Response from Project Proponent (28 March 2024)	We have updated section A4 of GHG plan with a section describing the physical conditions prior to project initiation.
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the GHG Plan and confirmed that the required information is now contained within the GHG Plan. This finding is closed.

Item Number	5
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.B INFORMATION IN A GHG PROJECT PLAN
American Carbon Registry Standard Version 8.0, July 2023 (Description)	Relevant outcomes from any stakeholder consultations and mechanisms for ongoing communication, as applicable;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section F3
Aster Global Round 1 Findings (15 January 2024)	The VVB notes that the GHG Plan Section F3 references the Environmental and Social Impacts Report provided as Appendix A. The template instructions for section F3 state: "Describe relevant outcomes from public comments and stakeholder consultations as well as mechanisms for ongoing communication, as applicable." It is unclear if there are outcomes from the public comments and stakeholder consultations that should be included in the GHG Plan.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding and ensure all GHG Project Plan template instructions are followed.

Round 2 Response from Project Proponent (28 March 2024)	Information on the stakeholder consultation process have been moved from Appendix A, section I-5 to the GHG Plan section F3. Additional details regarding relevant outcomes from stakeholder engagement have been added to GHG Plan section F3. The interim access plan is provided as *Rainforest Reserve Public Access Plan.docx*
Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification. The VVB reviewed the updated GHG Plan and determined that the Project provides an appropriately reasonable description of the relevant outcomes from public comments and stakeholder consultations. However, the GHG Plan does not provide specific information regarding what mechanisms will be used for ongoing communication.
Round 2 NCR/CL/OFI	CL: Please clarify in line with the finding and update the GHG Plan to describe the "mechanism for ongoing communication."
Round 2 Response from Project Proponent (05 August 2024)	North Coast Land Conservancy will continue to solicit input when their management and access plans undergo periodic review. If a change in management strategy is anticipated, it is NCLC's policy to engage stakeholders or interested parties to assess the impacts these changes may have on user groups. Outreach to these groups is done via email, in-person meetings, community meetings, or other mechanisms as appropriate. This information has been added to Section F3 of the GHG Plan.
Aster Global Round 3 Findings (16 August 2024)	Additional detail on ongoing communication has been added to Section F3 of the GHG Plan. **This item is addressed.**

Item Number	6
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.B INFORMATION IN A GHG PROJECT PLAN
American Carbon Registry Standard Version 8.0, July 2023 (Description)	Attestation by the Project Proponent and Project Developer Account Holder, if not the same entity, regarding the content of the GHG Project Plan and all appendices.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan, MR
Aster Global Round 1 Findings (15 January 2024)	The VVB did not locate a signed attestation regarding the content of the GHG Project Plan and all appendices.
Round 1 NCR/CL/OFI	NCR: Please provide an attestation regarding the content of the GHG Project Plan and all appendices.

Round 2 Response from Project Proponent (28 March 2024)	The GHG Plan and Monitoring Report have been signed by representatives from NCLC and TCT.
Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification, the VVB reviewed the updated documents and confirmed that the necessary attestations have been provided.. This finding is closed.

Item Number	7
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.E PROJECT MONITORING REPORTS
American Carbon Registry Standard Version 8.0, July 2023 (Description)	Project Monitoring Reports shall be completed for each verified Reporting Period using the most recently published template for ACR Monitoring Report.25
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_RP 1_MR_20231004.docx
Aster Global Round 1 Findings (15 January 2024)	The MR provided to the VVB does not use the MR v5.0 template available on the ACR website.
Round 1 NCR/CL/OFI	NCR: Please ensure the most recently published template version is used.
Round 2 Response from Project Proponent (28 March 2024)	The MR has been updated to the current version of ACR's template. Please find the updated MR named "Coastal Edge_RP 1_MR_20240123.docx".
Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification, the VVB confirmed that the latest version of the MR has been used. This finding is closed.

Item Number	8
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.E PROJECT MONITORING REPORTS

American Carbon Registry Standard Version 8.0, July 2023 (Description)	The report shall describe the current status of project operation, and detail the data monitored, the monitoring plan and the calculation of GHG emission reductions and removals for the Reporting Period.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	MR
Aster Global Round 1 Findings (15 January 2024)	While reviewing the MR, the VVB noted the following items: 1. Section IV: 1 template instructions state: "Provide the total acreage (rounded to the nearest acre) for the end of the Reporting Period" the acres reported in this section are not rounded correctly. 2. Section V: 2 template instructions require a description of "Transfer points and methods of non-automated transfer of data." The Coastal Edge_DataManagementSOP.docx document provided to the VVB states that data is stored by The Climate Trust in a secure cloud account. It is unclear from the SOP provided how data is transferred between TCT and other entities involved in the project, such as the North Coast Land Conservancy Inc. and TerraCarbon LLC.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the findings and ensure all MR template instructions are followed.
Round 2 Response from Project Proponent (28 March 2024)	Section IV: The acres in the MR are rounded accordingly to the nearest acres. Section V: The referral document has been changed to the GHG plan section E6 in the MR. The GHG plan is updated with the text around Data Storage and Transfer, where we used similar third-party-based storage to transfer the data.
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated MR and noted the following: 1. Acres have been rounded appropriately. This finding is closed. 2. The MR now references the updated GHG Plan. This finding is closed. 3. It is unclear to the VVB why vintages for 2021 have not been included in the MR and reported as appropriate within the table at the end of Section VI and Box 5.
Round 2 NCR/CL/OFI	CL: Please clarify in line with Finding 3 and update the MR as necessary.
Round 2 Response from Project Proponent (05 August 2024)	Thank you for catching this. An additional line has been added to Section VI-5 and the crediting summary table in the MR.

Aster Global Round 3 Findings (16 August 2024)	Thank you for the clarification. The VVB reviewed the updated MR and confirmed that this values has now been added. This finding is closed.

Item Number	9
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.E PROJECT MONITORING REPORTS
American Carbon Registry Standard Version 8.0, July 2023 (Description)	The regulatory compliance attestation must disclose all violations or other instances of non-compliance with laws, regulations, or other legally binding mandates directly related to Project Activities.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	MR Section IX: 1
Aster Global Round 1 Findings (15 January 2024)	Section IX: 1 does not state whether or not the project maintained regulatory compliance .
Round 1 NCR/CL/OFI	NCR: Please complete section IX: 1 of the MR.
Round 2 Response from Project Proponent (28 March 2024)	Section IX: 1 of the MR has been updated.
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated MR and confirmed that the regulatory attestation has been provided. Additionally, the VVB found no evidence during the site visit to contradict this attestation. This finding is closed.

Item Number	10
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.F.2.1 GENERAL PDA REQUIREMENTS:
American Carbon Registry Standard Version 8.0, July 2023 (Description)	description of eligibility criteria for recruiting new Sites to the PDA;

Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	MSDD
Aster Global Round 1 Findings (15 January 2024)	The VVB was unable to locate this information in the MSDD.
Round 1 NCR/CL/OFI	NCR: Please include a description of eligibility requirements for recruiting new sites and ensure all template instructions of the Multi Site Design Document are followed.
Round 2 Response from Project Proponent (28 March 2024)	This information has been expanded upon in Section IV - 5 of the MSDD.
Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification, the VVB reviewed the updated MSDD and confirmed that eligibility criteria have been provided in the appropriate section. However, the MSDD states "The geographic boundary for this PDA project is from the Oregon coast to the Willamette Valley, Oregon." and "New sites must be located within NCLC's service area, from the Columbia River south to Lincoln City, OR." These definitions of the boundary of the PDA project do not appear to be entirely congruent and therefore it is unclear to the VVB what the boundary of the PDA project is. Additionally, the geographic boundary of the PDA project is general and not specific and the VVB is concerned that the lack of specificity leads to confusion regarding the actual boundary of the geographic boundary.. The VVB is issuing an OFI to include additional spatially explicit boundaries for the geographic boundary of the PDA. The VVB reviewed NCLC's Standard-and-Practices_2023.pdf and notes that Appendix 46 states "NCLC's service area covers more than 2,600 square miles from the Columbia River south to Lincoln City, from the peaks of the Coast Range to the near-shore ocean. As of 2014, NCLC has worked to conserve more than 2,100 acres on more than 50 properties in Clatsop, Tillamook, and Lincoln counties and has facilitated the protection of over 1,000 additional acres."
Round 2 NCR/CL/OFI	CL: Please clarify in line with the finding and ensure that the description of the geographic boundary is consistent across all project documents. OFI: Define the geographic boundary so that the boundary is subject to significant interpretation by readers.

Round 2 Response from Project Proponent (05 August 2024)	The eligibility criteria for new sites has been updated in the MDSS for consistency. This section now reads "New sites will be located within and around NCLC's service area, in the geographic area from the Oregon coast to the Willamette Valley, Oregon." The geographic boundary of the PDA is defined at the regional level to facilitate the addition of future sites to the PDA as conservation and stewardship opportunities may arise.
Aster Global Round 3 Findings (16 August 2024)	The VVB reviewed the updated MDSS and has confirmed that the VVB's clarifications have been addressed and that the noted discrepancies have been addressed. This finding is closed.

Item Number	11
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.F.2.1 GENERAL PDA REQUIREMENTS:
American Carbon Registry Standard Version 8.0, July 2023 (Description)	Adherence to the aforementioned requirements shall be described in a Multi-Site Design Document, which shall be considered an appendix to the GHG Project Plan and presented at first validation and updated coincident with subsequent Cohort validations.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	MSDD
Aster Global Round 1 Findings (15 January 2024)	The VVB noted that an updated Multi-Site Design Document template version is available on the ACR website (v1.1 2023-12-01).
Round 1 NCR/CL/OFI	OFI: While the Project Proponent uses the template version of the MSDD that was available at the end of the reporting period, the VVB is issuing an Opportunity for Improvement to update the MSDD to the latest template version.
Round 2 Response from Project Proponent (28 March 2024)	We have updated to the current (as of 1/17/2024) version of this template.
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated MSDD and confirmed that the latest version of the MSDD has been used.

Item Number	12
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.F.2.2 SITE-LEVEL REQUIREMENTS FOR PDA:
American Carbon Registry Standard Version 8.0, July 2023 (Description)	For AFOLU projects, the geographic size of each Site;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	MSDD
Aster Global Round 1 Findings (15 January 2024)	The MSDD states that the project area is 3,299 acres. It is unclear which shapefile was used to calculate this area.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 2 Response from Project Proponent (28 March 2024)	The project area shapefile has been updated by removing the slivers and steep area. The removal of slivers that is non forest as per the definition result in decrease of 8.44 acres of the project area. This has been updated in all the calculation and maps of the GHG plan. The total project area is 3290.56 acres. The shapefile for the same is in the folder, named "*CoastalEdge_ProjectArea_20240124.shp*".
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated MSDD and confirms that the Project Area provided by the Project in the GHG Plan and associated shapefiles matches that of the updated MSDD.

Item Number	13
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.F.2.2 SITE-LEVEL REQUIREMENTS FOR PDA:
American Carbon Registry Standard Version 8.0, July 2023 (Description)	Description of the project activities carried out on the Site and how each Site demonstrates additionality;
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	MSDD
Aster Global Round 1 Findings (15 January 2024)	The MSDD references the GHG Plan for a description of the site's project activities. It is unclear to the VVB where the GHG Plan provides a description of the project activities carried out on the site.
Round 1 NCR/CL/OFI	CL: Please clarify how this requirement is met.
Round 2 Response from Project Proponent (28 March 2024)	Additional details and specific references to sections of the GHG plan have been provided.
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated MSDD and is reasonably assured that this requirement is satisfied.

Item Number	14
American Carbon Registry Standard Version 8.0, July 2023 (Section)	6.F.2.2 SITE-LEVEL REQUIREMENTS FOR PDA:
American Carbon Registry Standard Version 8.0, July 2023 (Description)	Name and contact details of the landowner and/or associated operator of each Site;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	MSDD
Aster Global Round 1 Findings (15 January 2024)	The contact details of the landowner are not included in the version of the MSDD provided to the VVB. It is unclear if this version is the publicly available version with this information redacted.
Round 1 NCR/CL/OFI	CL: Please provide the unredacted Multi-site Design Document, if applicable, or update the document to include all required elements.
Round 2 Response from Project Proponent (28 March 2024)	This information has been added to the Site Information Table

Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated MSDD and is reasonably assured that this requirement is satisfied.

Item Number	15
American Carbon Registry Standard Version 8.0, July 2023 (Section)	8.A ENVIRONMENTAL AND COMMUNITY IMPACT ASSESSMENT REQUIREMENTS
American Carbon Registry Standard Version 8.0, July 2023 (Description)	ACR requires the use of the most recently published ACR Environmental and Social Impact Assessment Report template on the ACR website, provided within or as an appendix to the GHG Project Plan, for the assessment of environmental and social impacts of the Project, taking into account the scope and scale of the project activity and the mitigation measures.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_GHG Plan Appendix A_ACR-Environmental-and-Social-Impact-Assessment-Report-v1.0_20240327
Aster Global Round 1 Findings (15 January 2024)	The template version used by the project (v1.0) does not match the most recently published template version available on the ACR website.
Round 1 NCR/CL/OFI	CL: Please ensure the most recently published ACR Environmental and Social Impact Assessment Report template is used.
Round 2 Response from Project Proponent (28 March 2024)	We have updated to the current (as of 1/17/2024) version of this template. Please see "Coastal Edge_GHG Plan Appendix A_ACR-Environmental-and-Social-Impact-Assessment-Report-v1.0.docx"
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated ACR Environmental and Social Impact Assessment Report and confirmed that it has been appropriately filled out by the Project and that the correct version of the template is used. This finding is closed.

Item Number	16
American Carbon Registry Standard Version 8.0, July 2023 (Section)	8.A ENVIRONMENTAL AND COMMUNITY IMPACT ASSESSMENT REQUIREMENTS

American Carbon Registry Standard Version 8.0, July 2023 (Description)	2. An assessment of the GHG Project's environmental and social risks and impacts for the project duration based on defined and defensible assumptions and taking into account the scope and scale of the project activity. The assessment shall include a review of risks and impact, as applicable, on terrestrial and marine biodiversity habitat and ecosystems; resource efficiency and pollution prevention including to air, water, soil and the ozone layer; the protection, conservation, or restoration of natural habitats such as forests, grasslands, and wetlands; labor rights and working conditions; gender equality; land acquisition and involuntary physical or economic displacement; and human rights and stakeholder engagement.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Appendix A
Aster Global Round 1 Findings (15 January 2024)	There are several categories that the project stated as being "Not within the scope of the IFM project" such as: Water Consumption and Stress, Safe and Healthy Working Conditions for Employees, Fair Treatment of all employees, and others. It is not clear how this implies a neutral impact selection. It is also not clear to the VVB how the Project determined that these sections are "Not within the scope of the IFM project." The VVB notes that Table 1C in Appendix A states the project activities will include gap creation. However, the GHG Plan states silvicultural activities will also include precommercial thinning and variable density thinning. It is unclear if the environmental and social risks and impacts for these additional silvicultural treatments have been considered in Appendix A.
Round 1 NCR/CL/OFI	CL: Please clarify in line with findings and update reporting documentation as necessary.
Round 2 Response from Project Proponent (28 March 2024)	- The neutral impact selection was used for categories where the IFM project activity itself did not have an identifiable positive or negative impact. - The project activity is improved forest management, as detailed in GHG Plan Section B6. Some categories such as Water Consumption and Stress and those in the Gender Equality category are not anticipated to be affected by a change in forest management. - Added a sentence explicitly including precommercial thinning and variable density thinning in the Environmental Impact assessment, Table 1C.

Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification. The VVB reviewed the updated ACR Environmental and Social Impact Assessment Report and agrees with the Project that the Project Activity (IFM) does not directly affect the categories. This finding is closed.

Item Number	17
American Carbon Registry Standard Version 8.0, July 2023 (Section)	8.B POSITIVE CONTRIBUTIONS TO SUSTAINABLE DEVELOPMENT
American Carbon Registry Standard Version 8.0, July 2023 (Description)	ACR requires reporting on the project activity's positive contributions to the U.N. Sustainable Development Goals (SDGs) using the most recently published ACR SDG Contributions Report template, provided within or as an appendix to the GHG Project Plan.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_ACR-SDG-Cont-Report-AFOLU-Project-v1.0-1_20240327.pdf, Coastal Edge_ACR-SDG-Cont-Report-AFOLU-Project-v1.0-1_20240327.xlsm
Aster Global Round 1 Findings (15 January 2024)	An SDG Contributions Report detailing how the project contributes to the relevant SDGs was provided to the VVB, however, the most recently published template was not used.
Round 1 NCR/CL/OFI	CL: Please provide an SDG Contributions Report using the most up-to-date template version.
Round 2 Response from Project Proponent (28 March 2024)	We have updated to the current (as of 1/17/2024) version of this template. Please see "Coastal Edge_GHG Plan Appendix A_ACR-Environmental-and-Social-Impact-Assessment-Report-v1.0.docx"
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the provided SDG Report and Spreadsheet and confirmed that these documents have been appropriately filled out by the Project. This finding is closed.

Item Number	18
American Carbon Registry Standard Version 8.0, July 2023 (Section)	A.3.2 ELIGIBLE LAND OWNERSHIP TYPES

American Carbon Registry Standard Version 8.0, July 2023 (Description)	ACR accepts projects on all land ownership types—private, public (municipal, county, state, federal, or other), and tribal—provided the Project Proponent demonstrates that the land is eligible, documents clear land title and carbon credit title, the carbon credit contract is enforceable, and the project activity is additional and meets all other requirements of the ACR Standard. Projects on public lands, like any other project, shall demonstrate that the activity is not required by regulations and meets other additionality criteria. Agriculture and land use projects that generate ERTs with no risk of reversal need not demonstrate land title.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan, Coastal Edge_GHG Plan Appendix C_deeds.PDF
Aster Global Round 1 Findings (15 January 2024)	1. The GHG Plan States "The relevant deeds are provided in the attachment Rainforest Reserve deeds - signed and recorded 10-26-2021 .PDF." This referenced document has not been provided to the VVB. 2. The VVB reviewed the "Coastal Edge_GHG Plan Appendix C_deeds.PDF" and noted that there is reference to funding from the Doris Duke Charitable Foundation via the Pacific Northwest Resilient Landscapes Initiative, it is unclear to the VVB what encumbrances/restrictions are adjoining this funding. 3. The VVB reviewed the Onion Peak easement 12-21-01.pdf; however, the easement document provided to the VVB doesn't appear to describe the allowable management activities within the two designated area.
Round 1 NCR/CL/OFI	CL: Please provide the referenced document in line with Finding 1. CL: Please clarify in line with Finding 2 and 3 and provide supporting evidence as necessary to support the Project's response.

Round 2 Response from Project Proponent (28 March 2024)	1. Apologies, that reference is outdated. The relevant deeds were included as GHG Plan Appendix C - deeds. The referenced text in the GHG Plan has been updated to reflect the correct document. 2. We reached out to the Land Trust Alliance regarding any applicable funding restrictions from their Pacific Northwest Resilient Landscapes Initiative. They provided a memo titled '*LTA memo regarding NCLC Rainforest Reserve',* which states that grantees "must demonstrate [they] will prioritize conservation of biological diversity, wildlife habitat and/or other closely related conservation values in the acquisition." The memo has been provided in the R1 - Supplementary materials folder. We further clarified with LTA that funding restrictions do not prohibit baseline activities. Please see '*The Climate Trust Mail - LTA memo regarding NCLC Rainforest Reserve*'. 3. The Onion Peak easement dated 12-21-01 transferred the right to determined whether timber will be cut within the Core Area to the Nature Conservancy. See Section 3-H (pg 4 of 11): "... nothing in this Easement gives Grantor the right to determine if timber will be cut within the Core Area." Therefore, the Core Area was excluded from baseline harvesting activities. In contrast, commercial timber harvest is allowed within Consulting Area provided that specific precautions and notice are given to the Conservancy (pg 6-7 of 11). Prohibited activities in the Consulting Area are detailed in section 6-E.

Aster Global Round 2 Findings (25 June 2024)	1. Thank you for the clarification. The VVB confirmed that the reference in the GHG Plan has been updated appropriately. This finding is closed. 2. Thank you for the clarification. The VVB reviewed the referenced memo provided by the LTA which states "The Grant Standards related to stewardship of fee owned properties stipulate grantees “must demonstrate [they] will prioritize conservation of biological diversity, wildlife habitat and/or other closely related conservation values in the acquisition.” The Grant Standards also note that management activities should “Retain mature, native forests and prohibit conversion of native forests to agriculture or other uses; Result in forests with diverse structure and composition, protect soils, minimize forest fragmentation, and generally maintain the ecological integrity specific to the site…”It is important to reiterate that there is nothing in the Grant Standards that prohibits active forest management of the property." Additionally, the VVB reviewed email correspondences between the Project and the LTA in which the Project both provides both a quantitative and qualitative description of the baseline scenario and LTA confirmed that the Grant Standards would not prohibit this baseline scenario. The VVB is reasonably assured that this criterion is satisfied. This finding is closed. 3. Thank you for the clarification. The VVB reviewed the easement and confirms that the Project's description is accurate. The VVB reviewed the OP_CE_Core_consulting.shp; however, the areas within this shapefile are not identified as either Core or Consulting Areas so the VVB was unable to confirm that the core area identified in the easement does not contain baseline harvesting. 3a. Additionally, the VVB reviewed the Survey:CS 11149 (accessed: https://delta.co.clatsop.or.us/surveys/11000-11999/CS%2011149.pdf) which appears to be the survey conducted that identifies the boundaries of the easement. The survey shows that the easement aligns with the eastern property boundary but the shapefile provided to the VVB does not align with the property boundary. It is unclear to the VVB why this discrepancy exists. 4. In review of Appendix C, the VVB noted that the approximately 460 acres of the Property are subject to the "purposes" of the Community Forest Program. The VVB understands that all land under this Grant Program is required to have a Community Forest Plan. The VVB is requesting a copy of the Community Forest Plan. 4a. Additionally, it is unclear to the VVB if the baseline activities as described in the GHG Plan are allowed within this area. 4b. Additionally, the VVB notes that this grant program and the restrictions it places on the Project, if any, are not described within the GHG Plan.
Round 2 NCR/CL/OFI	CL: Please clarify in line with findings 3 and 4 and provide supporting evidence as necessary.

Round 2 Response from Project Proponent (05 August 2024)	3. The easement zones have been labeled 'Core' and 'Consulting' as requested by the VVB. Please see the provided shapefile '*OP_CE_Core_Consulting_20240719.shp'* 3a. The updated shapefile (*OP_CE_Core_Consulting_20240719.shp)* is now aligned with the eastern property boundary as per the Survey:CS 11149 in line with the findings. NCLC also confirmed with us that the easement should line up with the eastern edge of the property. 4. The Headwaters Community Forest Plan has been added to the 'R2 - Supporting materials' folder (*Headwaters Community Forest Plan outline.pdf*). This management plan was submitted to the USFS and approved by the Community Forest Program. This plan has been folded into the overall management of the larger Rainforest Reserve property. 4a. The community forest program does not establish maximum allowable harvest levels. The program encourages active forest management and views economic returns from the land as a form of community benefit. The deed provided in Appendix C lists the remedies that would apply if the property were sold, converted to non-forest uses or a use inconsistent with the purposes of the Community Forest Program. The Purpose of the Community Forest Program is to establish Community Forests, defined as Forest land owned in fee-simple by an eligible entity that provides public access and is managed to provide community benefits pursuant to a Community Forest Plan (Final Rule §230.2 Definitions). The baseline management scenario does not prohibit public access or the development of a new Community Forest Plan. 4b. A description of the Community Forest Program has been added to Section C3 of the GHG Plan.

Aster Global Round 3 Findings (16 August 2024)	3. The VVB reviewed the updated shapefile provided which now labels easement zones as core or consulting. **This item is addressed.** 3a. The updated easement shapefile now aligns with the property boundary. **This item is addressed.** 4. Thank you for the clarification and the provision of the Community Forest Plan. The VVB notes that this plan explicitly states that a goal is "Goal 5: Provide local jobs through management and restoration of the property. " which if further described throughout the Plan. This finding is closed. 4a. Thank you for the clarification the VVB reviewed the Final Rule and Definitions document and notes that it states "Community benefits. One or more of the following: (1) Economic benefits such as timber and non-timber products resulting from sustainable forest management and tourism;" and "This final rule does not regulate the private use of land or the conduct of business. It is a grant program for local governments, Tribal governments, and qualified nonprofit organizations for purposes of acquiring land for resource conservation and open space preservation." Additionally, the VVB notes that the VVB has conducted an independent review of the public information available related to this Program and has not found information to contradict the Project's assertion that the proposed baseline management would not be allowed on the acres enrolled in this Program. This finding is closed. 4b. The VVB reviewed the updated GHG Plan and noted that Section C3 has been updated. This finding is closed. 1. The VVB notes that the Final Rules document states "Title to lands acquired using Community Forest Program funds must not be subject to encumbrances or agreements of any kind that would be contrary to the purpose of the Community Forest Program. " and "State that the community forest may not be sold and will not be conveyed or transferred to another eligible entity or encumbered in whole or in part, to another party without permission and instructions from the Forest Service; and." Based on the VVB's current understanding of the CFP's expectations and view that the entering into a 40 year agreement with ACR is considered an encumbrance and CFP should be made aware of this. It is unclear to the VVB what communication has occurred with CFP Program officers regarding the implementation of this carbon project on land that is currently enrolled in the CFP Program.
Round 3 NCR/CL/OFI	CL: Please clarify in line with finding 1 and provide supporting documentation/evidence as necessary.
Round 3 Response from Project Proponent (27 August 2024)	The Community Forest Program has been made aware of the carbon project. Please see the attached email '*The Climate Trust Mail - Community Forest Question.pdf*' where North Coast Land Conservancy staff reference the carbon project and check in with USFS Community Forest Program staff to confirm that harvest practices employed in the baseline are not prohibited under the program.
Aster Global Round 4 Findings 27 September 2024	The VVB reviewed the provided email documentation and is reasonably assured that CFP is aware of the carbon project. This finding is closed.

Item Number	19
FVS Modeling	
FVS Modeling	FVS Modeling (Degrowing)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	FVS Files
Aster Global Round 1 Findings (15 January 2024)	The Project Proponent used the FVS de-grow case (Keyword ID f40266d0-206b-4cb2-8a59-bd4441139f40) to grow trees forward 5 years forward from 2023 (using the DBH and Height of trees as measured in during the inventory). The Project Proponent then annualized DBH growth and subtracted each tree's respective annual DBH growth to create the treeinit table for the Grow 100_BAI65_SDI550_Mort5 (Keyword ID 103120e2-8171-40da-aa3b-79911edb5000) and Baseline Coastal Edge cases (Keyword ID dbb0b208-f626-4621-b544-a1e772b4b9b6). - The VVB received the FVS out db file for the de-grow case but is requesting the keyword file and FVSData database to assess keywords. - The VVB notes that heights were not degrown. This may have had implications. For example, TreeID 10301 has a measured height of 25 in 2023; this was used for both the de-grow case and Grow 100_BAI65_SDI550_Mort5 case. In the former case, the tree grew 0.60 inches DBH/yr and, in the latter, 0.72. It is unclear if this may be due to different keyword parameterizations or is a consequence of the same height being used, which influences tree diameter growth equations' projections.
Round 1 NCR/CL/OFI	CL: The VVB is requesting the key file and FVS_Data.db for the DeGrow case CL: Please explain why heights were not degrown.

Round 2 Response from Project Proponent (28 March 2024)	The FVS database for the degrow case has been uploaded as "Coastal Edge_ProjectBackup_DegrowRun_R1". We ran the FVS for the project baseline with height and DBH de-grown and compared the DBH growth rate with a 5-year de-grow table (with only de-grown DBH). The difference in the growth rate was minor: the overall tree-wise average DBH growth rate was 0.090 inches/year with a 5-year degrow run and 0.091 inches/year using both height and DBH de-grow TreeInIt data in a project baseline run. Out of 133 plots, 67 plots had no difference in the average DBH growth rate, while only 6 plots had a growth rate difference of greater than (+/-)0.03 inches/year. No plots had a difference > 0.10 inches/year. Only 6 individual trees had a DBH growth rate difference greater than (+/-) 0.1 inches/year. The tree with TreeID 10301 has the highest difference in DBH, with a growth rate difference of 0.24 inches/year. Please note that the baseline DBH growth rate for TreeID 10301 would be 0.36 inches/year instead of 0.72 inches/year as the baseline growth is based on a 10-year cycle while the de-grow is only in 5 years. Small difference in the growth rate for a few trees may be caused by natural stochasticity in the modeling process.
Aster Global Round 2 Findings (25 June 2024)	The VVB appreciates the FVS files for the DeGrow case; the VVB finds that the DeGrow case is appropriately parameterized. The VVB also appreciates the explanation for why heights were not degrown. Considering the implication (a difference of 0.001 inches/yr), this level of precision is lower than a reasonable level of precision expected from FVS. In addition, the implication is that the baseline tree growth is marginally higher; therefore not degrowing height has a conservative outcome.

Item Number	20
FVS Modeling	
FVS Modeling	FVS Modeling (Regeneration)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	FVS Files

Aster Global Round 1 Findings (15 January 2024)	It appears erroneous that planting and natural regeneration for the MED stratum of the Baseline Coastal Edge case is scheduled several years prior to the clearcut. Planting densities are set to 460 seedlings/ac before mortality (365.5 after). This is not congruent with the description in the GHG Plan (435 seedlings/ac). Natural regen densities are set to 395 seedlings/ac before mortality (335.75 after). This is not congruent with the description in the GHG Plan (400 seedlings/ac).
Round 1 NCR/CL/OFI	NCR: Please correct scheduling of regeneration such that it follows clearcutting, conforming to the textual description in the GHG Plan. CL: Please explain discrepant regeneration densities between the GHG Plan and the FVS cases
Round 2 Response from Project Proponent (28 March 2024)	The FVS run has been updated to align with the GHG plan based on our findings. Planting densities have been set to 435 seedlings per acre (with 90% survival), following the forester's suggestion (please refer to the Harvest Schedule in the "Profit_adapted to start date_2024_DanC.pdf" document in the supplementary folder). Additionally, natural regeneration is set to 200 seedlings per acre. Section E1 of the GHG plan has been updated accordingly.
Aster Global Round 2 Findings (25 June 2024)	The VVB notes the GHG Plan states "After harvest, stands are replanted with a mixture of western hemlock, Sitka spruce, Douglas fir, and red cedar at 435 trees per acre in line with common practice at comparable sites35 and exceeding FPA requirements which require a minimum of 100-200 seedlings per acre depending on site class. Natural regeneration was also modeled after harvest with an additional 200 trees per acre of natural regeneration of western hemlock and red alder to account for the young high density stands commonly observed at this site" The VVB finds that the FVS runs now regeneration keywords reflect this description and the mentioned Profit_adapted to start date_2024_DanC.pdf supports this level of regeneration. Additionally, the VVB confirms the timing of regeneration now is preceded by harvesting.

Item Number	21
FVS Modeling	
FVS Modeling	FVS Modeling (Keywords)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y

Evidence Used to Assess (Location in PD, MR or Supporting Documents	FVS Files
Aster Global Round 1 Findings (15 January 2024)	The BAIMult keyword was only in effect for the first simulated year The FVS temporal cycles are not aligned with scheduled thinnings. Therefore, the year of thinning implementation do not match the description in the GHG plan.
Round 1 NCR/CL/OFI	CL: Please explain why BAIMult is not applied to all years' growth NCR: Please ensure FVS implements activities as described in the Baseline
Round 2 Response from Project Proponent (28 March 2024)	As defined in the keyword BAIMULT, once it is in effect, it will continue to be in effect for the entire project cycle. We have aligned the FVS temporal cycle for thinning with the GHG plan prescription.
Aster Global Round 2 Findings (25 June 2024)	The VVB acknowledges that the FVS Keywords Guide states "Once in effect BAIMult remains in effect until replaced by a subsequent multiplier" and appreciates the explanation from the Proponent. The VVB also notes that the revised FVS runs have a one year TimeInt which ensures that thinnings occur in the years described in the GHG Plan

Item Number	22
FVS Modeling	
FVS Modeling	FVS Modeling (Site Index)
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	FVS Files

Aster Global Round 1 Findings (15 January 2024)	The calculations for site index used at the stand level are based on the workbook Site Index - WH.xlsx. The weighted average for the HIGH and MED strata ignore the site index of Killam-Fawceter-Rock outcrop complex, 60 to 90 percent slopes. This may be an error. Any soil types with missing site indices for western hemlock are assumed to have the same index as Douglas-fir. Given that site indices are species specific, it is unclear why the Project assumes Douglas-fir and Western Hemlock have the same site index. Additionally, the VVB was unable to locate a description of this procedure in the GHG Plan Regarding the site index calculations based on site trees, the VVB was unable to recreate the Project's site indices: - It is unclear why 5 was subtracted from the breast height age given that the Wiley 1978 equation uses breast height age. - It is unclear if a sample size of 1 is adequate to ascertain the site index for western hemlock in the MED stratum - Given the non-linear relationship of the Wiley 1978 equation, it is biased to average heights and ages before calculating site index. - It is unclear where the site index values came from in FVS_PlotInit as they do not match the values in Site Index Calculation_TreeCore, and - Assuming these values were calculated from western hemlock site trees, it is unclear why the FVS_PlotInit table attributes these to other species.
Round 1 NCR/CL/OFI	CL: Please ensure site index is determined correctly

Round 2 Response from Project Proponent (28 March 2024)	The site index spreadsheet (Site Index - WH_20240325.xlsx) has been updated to include the site index of the Killam-Fawceter-Rock outcrop complex. We used the default SI value for Western Hemlock of the FVS-PN variant, considering the plant association type for the Coast for the polygon of a particular soil type whose site index value is missing. The site index calculated using the soil survey is higher than the site index value calculated using the inventory tree core data for Medium and High strata. We used the SI derived from tree core data for the Medium and High strata because conservative assumptions on these parameters improved model fit to observed data (GHG Plan, Fig. E1). A paragraph has been added to the GHG plan section E1. Site index calculation - The "age" column in the TreeInIt tab of the spreadsheet [Site Index Calculation_TreeCore_20240335.xlsx] is the sum of the number of rings plus five, which represents the total age of the tree. As Wiley's 1978 equation uses the breast height age, we subtracted 5 years from the average age to get back to the breast height age. - The MED stratum has a sample size of 8 cores and is used to calculate the site index using the Wiley equation. However, the LOW stratum has only 1 sample size. We opted to use the SI calculated from SSURGO data for the LOW stratum. - Although averaging the SI value from the tree-level SI calculation yields a similar result to the SI calculated using the average heights and ages, we updated the SI in FVS files using the suggested tree-level approach. The difference between the Tree-level SI vs. the 'averaged' SI is less than one percent (-0.4 ft (0.4%) and 0.7 ft (0.9%) in High and Medium strata, respectively). The updated spreadsheet "Site Index Calculation_TreeCore_*.xlsx" is in the R1 folder. - The method for determining the site index values for the StandInIt tab has been added in the GHG plan section E1. The site index value from the PlotInIt tab has been deleted, which did not affect the growth projection. - The FVS_PlotInIt table has been updated and used to run FVS. The updated spreadsheet is named "R1 - RR_FVS_TreeInIt_Degrow.xlsx"

Aster Global Round 2 Findings (25 June 2024)	The response states "We used the default SI value for Western Hemlock of the FVS-PN variant, considering the plant association type for the Coast for the polygon of a particular soil type whose site index value is missing.". The Plant Association Type used in the FVS runs was the default 40 (CHS133 TSHE/GASH VAOV2). This has a default site index of 98 for DF; the project has updated this in Site Index - WH_20240325 to a value of 110 for WH. This is appropriate however, it is unclear why cell C7 in the Low Stratum has a value of 100 and not 110 as this soil series' site index is also marked to be imputed from FVS default. It is also unclear why the acres in the site index table do not match the strata acres described in the GHG Plan Site Index Calculations based on site trees: - The Proponent has clarified that 5 years was deducted because the age column was total tree age and not breast height age. The VVB is able to recreate the tree-wise site indices and stratum averages. This portion of the finding is closed. - The Proponent clarified that SSURGO (Site Index - WH_20240325.xlsx) is used for the Low stratum. Cores from Site Index Calculation_TreeCore_20240325 are used for the MED and HIG strata. This portion of the finding is closed. - The Proponent clarified that PlotInit's entry had no effect. The VVB can confirm as the plots were run not as individual stands so the PlotInit table is not applicable. This portion of the finding is closed.
Round 2 NCR/CL/OFI	CL: It is not clear why a site index of 100 is used for Laderly Rock outcrop complex, 60 to 90 percent slopes (cell C7 in Low Strata tab of Site Index - WH_20240325.xlsx). Please clarify CL: It is unclear why the strata acres in the Site Index - WH_20240325 workbook do not match the strata acres in the GHG Plan
Round 2 Response from Project Proponent (05 August 2024)	Thank you for catching this. The site index for the Laderly Rock outcrop complez, 60 to 90 percent slopes (in Low Strata tab of Site Index - WH_*.xlsx) has been updated in line with the findings. This slightly changed the SI value for Low strata and we updated the TreeInIt tab and reran the FVS. The Site Index workbook (Site Index - WH_20240626.xlsx) has been updated to match the strata acres.
Aster Global Round 3 Findings (16 August 2024)	The VVB is now able to recreate the revised site index calculations done by the Proponent using the NRCS Soil Web mapper for the LOW stratum. This finding is closed.

Item Number	23
FVS Modeling	
FVS Modeling	FVS Modeling (Baseline scenario)
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	FVS Files
Aster Global Round 1 Findings (15 January 2024)	The VVB notes that Coastal Edge_bsl_live_20231004.xlsx tab in Pivot_LiveTrees states "Clearcut in Yr 2 (HIGH), Yr 6 and Yr 11 (Medium), and Thinning in Yr 5 (Low) with two leave trees/acre, reforestation, Thinning 100 year". However, the keywords used for HIGH have a clearcut in yr 2 and a thin 13 years later, MED has a clearcut in yr 5 and a thin 16 years later, and LOW has a thin in year 5. It is unclear if this description of timing for the HIGH and MED strata in the workbook is correct . Further it is unclear if the timing of these thins for the HIGH and MED strata occur exactly as described in the GHG Plan (additionally, note the typo in "The Low strata were also pre-commercially thinned in year 5 of the project **strata date...**"). Along with potentially misaligned years, the VVB has not been supplied with an FVS run to support a clearcut in MED in 2031 (as described in the BSL Live workbook) or in 2032 (as described in Table E6 of the GHG Plan or the npv workbook). It is unclear why the pre-commercial thinning targets all species and diameter classes equally; no evidence is provided. The forest management plan preferred removing shorter trees
Round 1 NCR/CL/OFI	CL: Please clarify discrepant scheduling of silvicultural activities in the FVS baseline case with the GHG Plan and bsl workbook CL: Please correct typo identified in finding
Round 2 Response from Project Proponent (28 March 2024)	After consulting with the forester, we have slightly changed the baseline management plan, and the workbook (Coastal Edge_bsl_live_*.xlsx) is aligned with the FVS keywords for High and Medium strata for clearcutting (in Yr2, Yr7, and Yr12), reforestation (in Yr3, Yr8, and Yr13), and pre-commercial thinning (in Yr15, Yr20, and Yr 25). The update in the baseline management is reflected in the Table E6 of the GHG plan. The typo error has been corrected to ".....start date". The FVS run for all the baseline management plan is included in the project backup file "R1-FVS Project Backup". We have changed the thinning prescription to "thinning from below" in FVS per the forest management plan.
Aster Global Round 2 Findings (25 June 2024)	The scheduling of silvicultural activities in the revised FVS runs now mimic the description in Table E7 (note that the text on page 34 and this response refer to Table E6 rather than E7) and the description in associated workbooks. The VVB also notes that the thinning is now a thin from below as opposed to a thin-throughout; this is supported by the property's forest management plan.

Round 2 NCR/CL/OFI	CL: Please confirm the table reference (E6 or E7) and revise the table reference in the GHG Plan as appropriate.
Round 2 Response from Project Proponent (05 August 2024)	Thank you, the table reference has been updated to Table E7 in the GHG plan.
Aster Global Round 3 Findings (16 August 2024)	The VVB confirms the cell reference has been revised to E7 in Coastal Edge GHG Plan_20240805.docx. Closed.

Item Number	24
ACR IFM Methodology January 2022, v2.0 (Section)	1.3 SUSTAINABLE MANAGEMENT REQUIREMENTS
ACR IFM Methodology January 2022, v2.0 (Description)	Project areas subject to commercial harvesting at the project start date in the with-project scenario must adhere to one or a combination of the following:
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Forest Management Plan
Aster Global Round 1 Findings (15 January 2024)	It is unclear to the VVB whether the project area is *subject to* commercial harvesting at the project start date in the with-project scenario. The VVB notes that the GHG Plan states "No commercial harvesting has yet occurred on the project area under NCLC's ownership" yet in Section E9 also states timber harvests have been planned over the next 20 years and section A4 states "Carbon project revenues will enable NCLC to limit commercial harvesting and further their goals of enhancing old-growth forest structure ..."; it is unclear if this implies that the project area is "subject to" commercial harvesting at the project start. Additionally, the VVB notes the Forest Management Plan developed for the Rainforest Reserve has timber harvests planned.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding and update reporting documentation as necessary.

Round 2 Response from Project Proponent (28 March 2024)	The project area is not subject to commercial harvesting at the project start date. GHG Plan Section E9 has been updated to state that "minimal non-commercial management is planned over the next 20 years" to avoid confusion. Section A4 has also been edited to more accurately state that "Carbon project revenues will enable NCLC to avoid commercial harvesting and further their goals of enhancing old-growth forest structure ..." The Rainforest Reserve Forest Management Plan is undergoing revision in recognition of the different incentives and requirements presented by the carbon project (GHG Plan Section B6). Anticipated changes to the current plan (provided as 'rainforest_fmp.pdf' and dated January 2020) include further scaling back of the active management operations on the Reserve.
Aster Global Round 2 Findings (25 June 2024)	The VVB acknowledges that GHG Plan, not the Forest Management Plan, define the carbon project activities. Therefore, this revision makes it clear that the project is not subject to commercial harvesting.

Item Number	25
ACR IFM Methodology January 2022, v2.0 (Section)	2.1 PROJECT ELIGIBILITY
ACR IFM Methodology January 2022, v2.0 (Description)	Project Proponents must demonstrate that the project area, in aggregate, meets the methodology definition of forestland.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan E4
Aster Global Round 1 Findings (15 January 2024)	The VVB has performed an independent data check using LANDFIRE 2022 Refresh data; the average canopy cover within the project area is 64%. However, it is unclear to the VVB how the demonstration described in section A5 of the GHG Plan addresses the definition of Forestland as defined in the methodology: "Land with at least 10 percent cover (or equivalent stocking) by live trees of any size, or land formerly having such tree cover, and not currently developed for non-forest uses. Forestland must be at least 1 acre in size. Land proposed for inclusion in this project area shall meet the cover requirement, in aggregate, over the entire area". The GHG Plan states that meets this requirement because the area-weighted average basal area is 234.33 sq ft per acre. However, the GHG plan does not state how this is equivalent to at least 10 percent canopy cover

Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 2 Response from Project Proponent (28 March 2024)	The GHG plan section A5 has been updated with the canopy cover analysis performed using NLCD tree canopy cover data which shows that the aggregate canopy cover of the project area is over 10%.
Aster Global Round 2 Findings (25 June 2024)	The GHG plan section A has been updated and states "All areas qualify as "forestland" per the methodology definition of > 10% canopy cover. The average canopy cover of the project area is 74%, performed using the NLCD Percent Tree Canopy Cover layer." This finding is closed.

Item Number	26
ACR IFM Methodology January 2022, v2.0 (Section)	2.2 PROJECT GEOGRAPHIC BOUNDARY
ACR IFM Methodology January 2022, v2.0 (Description)	Project area map, delineated on a geographic information system;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	

Aster Global Round 1 Findings (15 January 2024)	The GHG plan includes a delineated project area map in Figure A1 and Figure A2. While reviewing the GIS shapefiles provided, the VVB noted the following: In reviewing the "CoastalEdge_Strata_wRMACEDS.shp" the VVB noted: 1. The shapefile appears to contain several sliver polygons and other topographic errors. 2. There appear to be stream areas removed that do not line up with RMA/CE/DSS buffer areas or stream shapefile provided (Stream_Rainforest Reserve_20230804). 3. Streams and buffer areas were not removed from the project area as described in GHG Plan Section B3. 4. The VVB was unable to recreate the area classified as steep. It is unclear exactly how percent slope was derived and steep areas were delineated. Additionally, in reviewing the "CoastalEdge_Strata_noRMAnew.shp" the VVB noted that: 5. There appear to be stream areas removed that do not line up with RMA/CE/DSS buffer areas or stream shapefile provided (Stream_Rainforest Reserve_20230804). 6. Streams and buffer areas were not removed from the project area as described in GHG Plan Section B3. Additionally, in reviewing the "The Coastal Edge_ProjectArea_20230613.shp" the VVB noted that: 6. The GHG Plan section B3 states that roads and streams were buffered and removed from the project area. The project area shapefile provided to the VVB does not appear to have been buffered against the stream shapefile provided (Stream_Rainforest Reserve_20230804). It is unclear what method was used to remove streams from the project area. 7. The GHG Plan states that "The road and stream polylines were buffered to determine the area to be removed." The acreages provided in the GHG Plan and MR for the high, medium, and low strata appear to include the road and stream buffer areas. It is unclear why these buffer areas are included in the project area. 8. It is unclear why two separate strata shapefiles were provided (CoastalEdge_Strata_wRMACEDS.shp & CoastalEdge_Strata_noRMAnew.shp) and why the strata acreages do not match.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding and ensure that all calculation workbooks consistently quantify project area and buffers.

Round 2 Response from Project Proponent (28 March 2024)	1. The strata shapefile has been updated by removing the slivers smaller than 1 acre. The new shapefile "CoastalEdge_Strata_20240124.shp" has been uploaded to the shared folder. Consequently, the project area has been reduced by 9 acres. 2. The stream shapefile available on the Oregon Department of Forest (ODF) website as cited in the GHG plan was updated in Oct 2023, after the inventory was completed. **The previously-available shapefile was last edited in 03/19/2022** (please see the column "Last_Edit_" in the attribute table of the shapefile "Fish_Presence_Stream.shp"). The previously-available shapefile **was used to delineate the stream areas which were removed from the project area, while RMA buffer used in baseline modeling was determined using the updated stream layer (Stream_Rainforest Reserve_20230804.shp).** 3. The stream layer obtained from ODF is in the form of a polyline shapefile. We created polygon features by buffering the stream width, and subsequently removed these polygons from the project area. 4. A DEM was downloaded from USGS (USGS_13_n46w124_20130911). The DEM has been provided for reference, and a URL address to the metadata is provided at the bottom of this cell. The Slope tool was applied to the DEM to generate percent slope. The resulting raster was then clipped to the extent of the Rainforest Reserve parcels to speed processing time. Raster symbology was modified so that slopes > 120% were highlighted in a fuchsia color. Strata I, II, and III were then manually edited using the Split tool in the Edit Features menu to exclude areas with a high proportion of slopes >120% . Steep areas had to be larger than ca. 0.5 acres for inclusion into the Steep strata. A pdf map (*Coastal Edge Slope Analysis Map.pdf*) showing the slope raster and strata boundaries has also been included for reference. 5. The stream layer downloaded on 10/10/2022 will correspond to the area where streams have been removed. Please refer to the 'Fish_Presence_Stream.shp' shapefile for further details. 6. Apologies for the confusion here. The stream layer used for buffering to remove stream from project area, as outlined in GHG plan section B3, has now been updated on the ODF website. The downloaded stream file referenced in bullet 5 is now available in the shared folder for your review. 7. The areas removed from the project area consist solely of the streams and roads, excluding the RMA buffer. The stream and road layers obtained from ODF and the Department of Transportation, respectively, only contain polylines. These polylines were buffered according to the types and widths of the respective streams and roads, as outlined in the GHG plan, and the resulting areas were subsequently removed from the project area. The updated strata shapefile now reflects the inclusion of the RMA area after removing these streams. 8. The shapefile has been renamed, and the shapefile in the shared folder has been updated in line with the findings. Please refer to the shapefile "CoastalEdge_Strata_20240124.shp". DEM metadata: https://thor-f5.er.usgs.gov/ngtoc/metadata/waf/elevation/1-3_arc-second/undefined/USGS_13_n46w124_20130911.xml

Aster Global Round 2 Findings (25 June 2024)	1. The VVB reviewed the updated shapefile and noted that, while improved, the "CoastalEdge_Strata_20240124.shp" still contains several sliver polygons (some examples include: 45°49'12.91"N, 123°53'48.02"W ; 45°48'7.78"N, 123°54'48.11"W ; 45°49'31.78"N, 123°54'21.68"W) that are included in the baseline scenario but do not appear to be operable. Additionally, the VVB noted that some of these slivers appear to be the result of boundaries that are misaligned. 2. Thank you for the clarification on data sources used for the stream shapefiles. The VVB was able to confirm that the RMAs are designated using the Hydrography Flow Line dataset made available by ODF on 6/30/2023. It is not explicitly clear from the GHG Plan the source of the stream data used by the project (no footnote present). 3.The VVB was able to successfully recreate stream widths to be removed from the project area using the 2022 Fish_Presence_Stream.shp shapefile. **This item is addressed.** 4. Additional clarification on how the steep slope areas were delineated was provided to the VVB, along with the DEM file used. The VVB was able to independently recreate the slope map provided. The VVB did not find evidence for why steep areas must be larger than 0.5 acres to be removed from the project. It is unclear why this size threshold was chosen. 5. The VVB was able to successfully recreate stream widths to be removed from the project area using the 2022 Fish_Presence_Stream.shp shapefile. **This item is addressed.** 6. The VVB was able to re-create the stream buffer RMAs applied to the project area using the Hydrography Flowline dataset from the ODF. The VVB is reasonably assured that the RMA buffer areas have been delineated following the guidance in the 2023 Oregon FPA. The stream matrix used to create Table E5 in the GHG Plan does not appear to use the most up-to-date stream matrix data available. 7. The VVB reviewed the updated strata shapefile (CoastalEdge_Strata_20240124) and noted that roads have been removed as stated in the GHG Plan. The VVB notes that the RMA buffer areas do not include the road and stream widths that have been removed from the project area. The VVB understands that a different shapefile was used to remove stream widths (Fish_Presence_Stream.shp) vs. create RMA stream buffers (Stream_Rainforest Reserve_20230804.shp). It is unclear why the stream widths of streams included in the Stream_Rainforest Reserve_20230804.shp were not also removed from the project area. 8. The VVB reviewed the updated shapefile provided (CoastalEdge_Strata_20240124). The acres now match those reported in the GHG Plan and MR. **This item is addressed.**
Round 2 NCR/CL/OFI	CL: Please clarify in line with findings 1,2,4,6,7 and update the Project documentation and provide supporting evidence as necessary.

Round 2 Response from Project Proponent (05 August 2024)	1. While all isolated slivers less than 1 acre in size have been removed (see *CoastalEdge_ProjectArea_20240124.shp*), polygons that are less than 1 acre but not isolated (e.g., polygons that are bordered by other forest area) in the strata shapefile have been left. Non-isolated slivers meet the forest definition requirement. For example, the polygon at 45°48'7.78"N, 123°54'48.11"W is Med strata surrounded by Med RMA/CE/DSS strata). Small polygons in the strata shapefile are the post-processing result caused by removing RMA buffer and conservation easements for the baseline management. The updated conservation easement shapefile (*OP_CE_Core_Consulting_20240719.shp*) now aligns with the eastern side boundary of the property. The baseline acreage on the northeast side of the property now became the RMA. The slight change is acreage has been updated in all of the calc workbooks. The updated strata shapefile (*CoastalEdge_BSL_Strata_R2.shp*) has been provided to the VVB. 2. Thanks for the opprtunity to clarify this on the GHG plan. The footnote in the GHG plan (in section B3) has been updated to clarify the data sources used to generate the stream buffer during inventory and the baseline modeling in line with the findings. 4. 0.5 acres was chosen as the minimum size for the creation of 'Steep' strata polygons to facilitate manual stand mapping. Where judged to be reasonable, several adjacent sliver polygons were generalized into larger polygons by including areas with slopes less than the STEEP threshold. 6. The column names and reference in Table E4 in the GHG Plan have been updated to more clearly state that the Standard Practice Widths provided in this matrix refer to the Feb 2021 and Feb 2023 versions of the Oregon Forest Practices Act, respectively. Please note that the baseline restriction is a conservative interpretation of the 2023 FPA. 7. Stream widths from the updated stream layer were not removed from the project area because neither version of the stream layer did a great job of capturing stream boundaries with a high degree of precision. Streams in the project area have a high degree of canopy cover and therefore those areas still meet the forest definition.

Aster Global Round 3 Findings (16 August 2024)	1. The VVB reviewed the updated easement shapefile (OP_CE_Core_Consulting_20240719.shp) and noted that there are areas designated as Core areas that overlap with non-RMA strata, primarily along the boundary. It is unclear why this overlap occurs. 2. The GHG Plan has been updated to include data sources for both stream layers. **This item is addressed.** 4. Thank you for the additional clarification. The VVB reviewed slope and DEM data for the project area and is reasonably assured that all high slope areas have been removed from the project area. **This item is addressed.** 6. Table E4 and associated footnotes have been updated to more clearly describe how the project has met SMZ width requirements. **This item is addressed.** 7. Thank you for the additional clarification. The VVB understands that the stream layers used for delineating SMZs may include areas that meet the definition of forestland and have not been removed from the project area. The GHG Plan section B3 describes what has been removed from the project boundary and what data sources were used. **This item is addressed.**
Round 3 NCR/CL/OFI	CL: Please clarify why there are areas of non-RMA strata within Core easement areas.
Round 3 Response from Project Proponent (27 August 2024)	1. Thanks for the opportunity to clarify this. The conservation easement shapefile was in a different projection system which caused the overlapping of Core areas with non-RMA strata. We have updated the easement shapefile (*OP_CE_Core_Consulting_20240819_Proj10N.shp*) with the correct projection system and there is no longer overlapping between non-RMA strata and Core areas.
Aster Global Round 4 Findings 27 September 2024	The VVB reviewed the updated easement shapefile and noted that the boundaries now align. There are no non-RMA strata within the easement area. **This item is addressed.**

Item Number	27
ACR IFM Methodology January 2022, v2.0 (Section)	2.2 PROJECT GEOGRAPHIC BOUNDARY
ACR IFM Methodology January 2022, v2.0 (Description)	Property parcel map or recognized equivalent
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan
Aster Global Round 1 Findings (15 January 2024)	It is unclear to the VVB where a property parcel map or equivalent has been provided in the GHG Plan.
Round 1 NCR/CL/OFI	NCR: Please include a property parcel map or recognized equivalent in the GHG Plan.
Round 2 Response from Project Proponent (28 March 2024)	The tax lot parcel map of the project area is updated in the GHG plan section A6.
Aster Global Round 2 Findings (25 June 2024)	A tax lot parcel map has been provided in Section A6 of the GHG plan provided. This finding is closed.

Item Number	28
ACR IFM Methodology January 2022, v2.0 (Section)	2.3 PROJECT TEMPORAL BOUNDARY
ACR IFM Methodology January 2022, v2.0 (Description)	Land acquisition or easement enrollment date;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section H1, Coastal Edge_GHG Plan Appendix C_deeds.pdf Clatsop county property search
Aster Global Round 1 Findings (15 January 2024)	The project start date is 26 October 2021 in the GHG Plan. However, the County of Clatsop records the date of sale as 25 October 2021. The VVB notes that the Grantor signed the deed on 25 October 2021 and the Grantee on 26 October 2021
Round 1 NCR/CL/OFI	CL: Please clarify in lien with finding.
Round 2 Response from Project Proponent (28 March 2024)	The transaction date for the deed is 10/26/2021 (See GHG Plan Appendix C - deeds). NCLC considers this to be the land acquisition date.

Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification. The VVB notes that the Clatsop County Clerk recorded the transaction on 10/26/2021. This item is addressed.

Item Number	29
ACR IFM Methodology January 2022, v2.0 (Section)	2.4 ADDITIONALITY
ACR IFM Methodology January 2022, v2.0 (Description)	The regulatory surplus test involves evaluating existing laws, regulations, statutes, legal rulings, deed restrictions, or other regulatory frameworks relevant to the project area that directly or indirectly affect GHG removals or emissions reductions associated with a project action or its baseline candidates, and which require technical, performance, or management actions. Where project lands were purchased with donor funds, this includes confirmation that funding stipulations do not prohibit baseline activities. All legally binding conditions of easements enacted either more than 1 year before or more than 3 years after the project start date must also be considered. Regulatory surplus must be confirmed at each validation. Voluntary guidelines are not considered in the regulatory surplus test.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section C3

Aster Global Round 1 Findings (15 January 2024)	1. Section A7 of the GHG Plan lists regulatory frameworks relevant to the project area including the Oregon Forest Practices Act and the Endangered Species Act. However, the VVB understands that the Oregon has an Endangered Species Act and it is unclear to the VVB why this Act has not been included. 1a. The VVB understands that the Oregon Endangered Species Act is relevant for land over which the state has a recorded easement. It is unclear to the VVB if the OWEB easement falls into this cat3gory. 2. Section C3 of the GHG Plan states that the OWEB Conservation Easement was recorded less than 5 years after the projects start date, however the methodology stipulates 3 years. It is unclear the relevance of the noted 5 year time frame. Further, this section references Section A6 of the GHG Plan for relevant laws and regulations, however regulations are presented in section A7. 3. The VVB reviewed the Rainforest Reserve OWEB CE - recorded.pdf which states "a. In consideration of OWEB funds in the amount of $2,000,000.00 (the "Funds") applied by Owner to the purchase price of the Property, Owner hereby grants to OWEB a perpetual conservation easement on the Property, subject to the terms stated below. Owner fully warrants its title to the Property and will warrant and defend the same Property against all lawful claims." The timeline for property acquisition is unclear to the VVB. 4. The Rainforest Reserve OWEB CE - recorded.pdf document contains a "Recitals" section which references a "Weyerhaeuser Easement" and an "OPRD Permit", it is unclear to the VVB what these documents are and what the implications for the project are. 5. The GHG Plan states that the Onion Peak easement covers 295 acres; however, the easement document references 386.64 acres. It is unclear why this discrepancy exists. 5a. It is unclear to the VVB how the "consulting area" within the Onion Peak easement is incorporated into the baseline modeling. 6. The methodology states "Where project lands were purchased with donor funds, this includes confirmation that funding stipulations do not prohibit baseline activities." It is unclear to the VVB how this requirement has been met and what evidence has been provided to the VVB to demonstrate that this requirement is satisfied.

Round 1 NCR/CL/OFI	CL: Please clarify in line with findings 1, 1a, and 2 and update reporting documentation as needed. CL: Please provide a clear timeline for acquisition for all parcels located within the Project Area in line with Finding 3. CL: Please provide copies of the referenced "Weyerhaeuser Easement" and "OPRD Permit" and update project documentation as necessary. CL: Please clarify in line with Finding 5, 5a, and 6 and provide supporting evidence and update reporting documentation/quant documents as necessary.
Round 2 Response from Project Proponent (28 March 2024)	1. Information on the Oregon Endangered Species Act has been incorporated into Section A7 of the GHG Plan. An email correspondence with ODF confirms that there are no known instances of TE species on the Rainforest Reserve (The Climate Trust Mail - TE species at the Rainforest Reserve.pdf) 1a. See Response #1 above. 2. Thank you for catching this. The relevant timeframe has been corrected to three years, and the references section has been changed to section A7. 3. The property was acquired by North Coast Land Conservancy on 10/26/2021 (see response to finding #28). The OWEB easement was executed at a later date: 12/15/2022. 4. The Weyerhaeuser Easement and OPRD Permit both increase access across the project area to facilitate active management and commercial timber harvest where desired. These documents are included for VVB review as ROE Permit - Oswald West (OPRD Permit) and Weyerhaeuser access - Recorded_10.26.21. 5. The Onion Peak easement extends beyond NCLC's property boundary, so only 295 acres of the project area are affected by the easement. A shapefile (OP_CE_Core_consulting) has been included in the Round 1 materials for reference. 5a. The consulting area is included in the regular baseline harvest regime, without extra protections afforded by the easement. Clarification on this point has been added to GHG Plan section C3. 6. We reached out to the Land Trust Alliance regarding any applicable funding restrictions from their Pacific Northwest Resilient Landscapes Initiative. They provided a memo titled 'LTA memo regarding NCLC Rainforest Reserve', which states that grantees “must demonstrate [they] will prioritize conservation of biological diversity, wildlife habitat and/or other closely related conservation values in the acquisition.” The memo has been provided in the R1 - Supplementary materials folder. We further clarified with LTA that funding restrictions do not prohibit baseline activities. Please see 'The Climate Trust Mail - LTA memo regarding NCLC Rainforest Reserve'.

Aster Global Round 2 Findings (25 June 2024)	1. Oregon Endangered Species Act information has been added into Section A7 of the GHG Plan. The email correspondence with ODF state "the State layer the Rainforest Reserve property has no encumbrances from TE species." The VVB notes that there appears to be a typo in Section A7 where the proponent states "The project area was 100% privately land..." It is unclear what this sentence is meant to state. 1.a. See above. This finding is closed. 2. The timeframe ha been corrected to 3 years and Section A7 is listed. This part of the finding is closed. 3. The VVB reviewed the OWEB easement and confirmed that the easement was executed on 12/15/2022 and therefore does not need to be considered in the regulatory surplus test. This finding is closed. 4. Thank you for the clarification and the additional documents. The VVB reviewed the additional documents and is reasonably assured that the Project has access to the areas and therefore they could be harvested in the baseline. 5. This finding is pending other findings already written. 5.a. This finding is pending other findings already written. 6. Thank you for the clarification. The VVB reviewed the referenced memo provided by the LTA which states "The Grant Standards related to stewardship of fee owned properties stipulate grantees “must demonstrate [they] will prioritize conservation of biological diversity, wildlife habitat and/or other closely related conservation values in the acquisition.” The Grant Standards also note that management activities should “Retain mature, native forests and prohibit conversion of native forests to agriculture or other uses; Result in forests with diverse structure and composition, protect soils, minimize forest fragmentation, and generally maintain the ecological integrity specific to the site…”It is important to reiterate that there is nothing in the Grant Standards that prohibits active forest management of the property." Additionally, the VVB reviewed email correspondences between the Project and the LTA in which the Project both provides both a quantitative and qualitative description of the baseline scenario and LTA confirmed that the Grant Standards would not prohibit this baseline scenario. The VVB is reasonably assured that this criterion is satisfied. This finding is closed.
Round 2 NCR/CL/OFI	1. OFI: The VVB notes the typo as an opportunity for improvement to enhance the readability of the GHG Plan.
Round 2 Response from Project Proponent (05 August 2024)	1. Thank you for the note. The sentence has been updated to read "The project area was 100% privately owned..."
Aster Global Round 3 Findings (16 August 2024)	The VVB notes the VVB has elected to revise the GHG Plan in response to the OFI.

Item Number	30
ACR IFM Methodology January 2022, v2.0 (Section)	2.4 ADDITIONALITY

ACR IFM Methodology January 2022, v2.0 (Description)	1) describing the predominant forest management practices occurring on comparable sites of the region that have not been enrolled in a carbon offset project (e.g., similar forest type, ecological condition, species product mixture),
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section C4
Aster Global Round 1 Findings (15 January 2024)	The GHG Plan defines "similar forest type" as "predominantly Pacific Northwest conifer, including a large component of Western hemlock, Sitka spruce, and Douglas fir, and under corporate ownership". To demonstrate similarity between these forest type groups and the project area, the GHG Plan compared merchantable cu ft/acre with FIA-derived averages for these forest type groups. The VVB found that the project area consisted of approximately 50% Douglas-fir group, 47% hemlock/sitka group and 3% alder/maple group using FIA data. The area-weighted merch cu ft of the project area equates to an estimated 7,118 cu ft/ac which compares well against the project area (6,852 cu ft/ac or 7164 cu ft/ac). However, the VVB finds that cu ft/ac was derived from merchantable volume on all forestland, irrespective of ownership. It is not apparent that this meets the qualifier of "corporate ownership". Table C1 does not match the table in the Coastal Edge_AG C_MCuFt tab of the common practice worksheet. The statement "With an average of 6,763 merchantable cubic feet/acre" does not match Table C1 in the GHG plan nor the common practice worksheet. It is unclear how the second exercise (carbon stocks by ownership in the Oregon coast) relates to the first (merchantable volume by forest type group in the state of Oregon). The VVB notes that the Table B6 and C6 in christensen et al. 2019 aggregates over forest type groups. It is unclear to the VVB how comparable sites have been identified beyond the species mixture, ownership type and region. (e.g. ecological condition). The GHG Plan states: "Through informal conversations with ODF foresters, 120% was determined to be a reasonable upper limit for large-scale timber harvesting on steep slopes in the region." The VVB requests verifiable evidence to support the definition of STEEP slope as being >120%. Further, the VVB noted in the FMP that "No logging will be allowed on slopes exceeding 70 percent, or slopes with a high likelihood of instability." It is unclear whether harvesting on slopes >70% is common practice in the region and/or economical. Additionally, the 2024 FPA defines "High landslide hazard location" as any slope in Western Oregon steeper than 80%.
Round 1 NCR/CL/OFI	CL: Please update the GHG plan in line with the finding and provide supporting evidence as necessary.

Round 2 Response from Project Proponent (28 March 2024)	1. Because FIA provides total carbon stocks and acreage in separate tables for each Species or Forest Type Group, we were unable to align the carbon and acre estimates with respect to both forest type AND ownership to generate per-acre estimates (see TOC tab in the 'Coastal Edge_CommonPractice.xls' workbook). This is why Table C2 reported merchantable volume on all forestland irrespective of ownership. During this review, we found that the Christensen paper does report aboveground carbon and acreage by forest type and land status (timberland vs. other forestland). This data has a narrower geographic scope (Oregon Coast Range vs state-wide for FIA) and allows us to get closer to land use patterns with the timberland distinction. Table C2 has therefore been updated with data from Christensen et al. We then show that corporate ownership is correlated with the lowest stocking out of any timberland owner group. The raw FIA data is no longer necessary and has been removed from the GHG Plan and the updated workbook 'Coastal Edge_CommonPractice_20240130.xls'. 2. The Common Practice workbook has been updated to show carbon and MCuFt estimates that have been de-grown to the start date. After changing the project acreage in response to finding #26, the area-weighted average values were also updated. 3. Because we were unable to find FIA data showing per-acre carbon stocks for our specific forest type and ownership combination, we instead strove to demonstrate that the carbon stocks on the Rainforest Reserve were already higher than similar forest types (Table C2) and similar ownerships (Table C3). Because corporate owners have the lowest average stocking and sequestration rates of any group, it is unlikely that corporate ownerships on the hemlock / Sitka spruce forest type would exceed average stocking for the forest type. Project activities are intended to further increase carbon stocking, so the project is expected to continue to exceed common practice. 4. The methology requires a comparison of carbon sequestration on comparable sites of the region that have not been enrolled in a carbon offset project (e.g., similar forest type, ecological condition, species/product mixture). The project is given the opportunity to define 'comparable sites' using relevant forest characteristics—the Methodology does not prescribe which characteristics must be used (inferred by the use of e.g. rather than i.e. in the list above). Our common practice analysis is shaped/constrained by data availability. We did not include ecological condition in the definition of comparable forest types because this is a vague term not commonly used in forestry (and not defined in the Methodology), which is not easily measured and therefore complicates direct comparison to other forestland. 5. We confirmed with an ODF forester that 120% is a reasonable limit for commercial harvesting on steep slopes. Please find the attached email 'The Climate Trust Mail - Slope threshold.pdf'. Additionally, we ran the 'Zonal Statistics as Table' tool in ArcGIS Pro to provide some more information on the steepness of the project area. The mean slope for the non-STEEP strata is 36% (Low strata) , 56% (Med strata), and 45% (High strata). The 90% values for each strata are 59% (Low strata), 67% (High strata), and 84% (Med strata). Therefore, the majority of each area in the baseline harvest plan is well below the 120% maximum slope threshold set in conversation with ODF. Table E8 of the GHG Plan has been updated to include these data for context.

Aster Global Round 2 Findings (25 June 2024)	The VVB notes that the common practice demonstration now uses only carbon stock density for comparison and finds that the use of Christensen et al. to compare carbon stocks and carbon stock change by region and forest type is much more precise for comparison (this corrects the first portion of the finding issued prior). Additionally, the values in Table C1 do accurately report aboveground carbon stock density (this corrects the second portion of the finding issued prior). The VVB understands that the Methodology the ability to define metrics for comparability; VVB notes Law et al. 2004 (doi: 10.1111/j.1365-2486.2004.00822.x) and hudiburg et al. 2009 Eco. app. 19(1) found that carbon dynamics within the Pacific Northwest are driven most by climate and that topographically-defined regions (e.g. "the Coast Range") capture this variability. Therefore, the VVB is sufficiently assured that the Common Practice demonstration has adequately defined comparability. However, the VVB has found potential errors in Coastal Edge_CommonPractice_20240130 which require clarification and potential correction. Specifically, Coastal Edge_CommonPractice_20240130 states Table A22 in Christen et al displays 1 thousand acres of timberland and 5 thousand acres of other forestland for the Redw0od (note the typo in the table) forest type. However, Table A22 shows there are 6 thousand acres of timberland and 0 thousand acres of other forestland. Additionally, Coastal Edge_CommonPractice_20240130 states Table B6 in Christen et al displays 4,704 Total mtCO2e/yr (x1,000) for other federal and displays 1097 SE Total mtCO2e/yr (x1,000) (including soils and forest floor) for state/local govt , when, Table B6 shows there are 4,707 Total mtCO2e/yr (x1,000) for other federal and 1,098 SE Total mtCO2e/yr (x1,000) (including soils and forest floor) for state/local govt. Coastal Edge_CommonPractice_20240130 also states Table C6 private corporate unreserved forests total SE is 3,200 AG mtCO2e (x1,000), when, Table C6 displays private corporate unreserved forests total SE as 4,698 AG mtCO2e (x1,000). 6. The VVB reviewed Table E6 of the GHG Plan and is requesting that the Project Provide the underlying property shapefiles that were used in the analysis.
Round 2 NCR/CL/OFI	CL: Please clarify in line with finding and revise the Common Practice section in the GHG Plan and workbook as necessary
Round 2 Response from Project Proponent (05 August 2024)	Apologies for the transcription errors. These errors have been corrected in the workbook *CoastalEdge_CommonPractice_20240625.xlsm* and in Table C2 of the GHG plan. 6. The shapefile has been provided in the Round 2, R2 - Supplementary materials folder as *taxlot_accounts_RRneighbors.zip.* Please note that we merged the Arch Cape Sanitary District & Onion Peak LLC parcels because they are now both under the ownership of the Arch Cape Water and Sanitary Districts. The ownership change is reflected on the Clatsop County Webmap (https://delta.co.clatsop.or.us/apps/ClatsopCounty/). The 'Current Owner' column of this entry has been updated in Table E6 of the GHG Plan as well for clarity.

Aster Global Round 3 Findings (16 August 2024)	The VVB confirms that the corrections made have addressed the previous findings. 1. However, Table C1 states it is average live aboveground carbon by stratum. This table is computed in CoastalEdge_wp_livetreeproj however, it is appears to be above and belowground standing live stock. 2. The VVB reviewed the neighboring taxlot shapefile provided along with forest loss data from the previous 20 years and was able to recreate the percent loss for each ownership type reported in table E6. However, it is unclear if the Proponent's analysis has accounted for forest loss from fire or other disturbances. 2a. Additionally, the VVB was not able to reconstruct that 57.48% of the Rainforest Reserve would be harvested in the 20 yr crediting period. 3. Additionally, the VVB notes that the GHG Plan states "The properties immediately bordering the Rainforest Reserve also demonstrate a history of intense harvesting; 50-80% of land on the properties immediately adjacent to the Rainforest Reserve were cleared of forest in the 20 years preceding the carbon project start date based on a GIS analysis utilizing the Hansen Global Forest Change Dataset (Table E6)." The VVB notes that Table E6, actually shows a range of harvesting intensity from approximately 1-81%. It is unclear to the VVB why this discrepancy occurs. 4. Additionally, it is unclear to the VVB why ownership types that are not relevant for the baseline scenario are included in this table (e.g. Government and Non-profit).
Round 3 NCR/CL/OFI	CL: Please clarify with regards to Table C1 in the GHG Plan, and update quantification as necessary. CL: Please clarify if the loss of forest analysis accounts for loss from disturbances CL: Please provide calculations used to determine the harvest intensity for the baseline referenced in Table E6 CL: Please clarify in line with Finding 3 and 4 and update the Project documents as necessary.

Round 3 Response from Project Proponent (27 August 2024)	1. Thank you for this important correction. Table C1 has been updated to include only AG live biomass. This calculation is in the workbook *CoastalEdge_wp_livetreeproj_20240816.xlsx.* 2. An analysis using the GLAD 'annual global forest loss due to fire' dataset confirmed that less than one percent of the forest loss reported in Table E6 was due to fire. We have added a workbook detailing the analysis procedure and calculations to the shared folder (*Forest loss GIS analysis - RR neighbors.xlsx*). The text preceeding Table E6 in the GHG Plan was also updated to reference this fire loss analysis. 2a. A workbook detailing the calculations and analysis procedure has been added to the VVB shared folder. Please note that small changes to the strata shapefile in response to other findings have caused this value to change to 57.35% (*Forest Loss GIS analysis - RR neighbors.xlsx*). 3. This sentence in the GHG Plan has been changed to "Up to 80% of land on the properties immediately adjacent to the Rainforest Reserve were cleared of forest in the 20 years preceding the carbon project start date..." 4. The criteria for inclusion in this analysis is defined as properties that are immediately adjacent to the Rainforest Reserve.
Aster Global Round 4 Findings 27 September 2024	1. The VVB reviewed the updated workbook and Table C1 in the GHG plan and confirms that live above-ground carbon is computed and reported correctly. This finding is closed. 2. The VVB reviewed the GLAD fire data and recreated loss due to fire within the relevant propoerties.A similar percentage (less than 1%) of loss was found to be due to fire. Additional detail was added to GHG Plan Section E1 stating that less than 1% of forest loss in table E6 was due to fire. This finding is closed. 2a. The VVB reviewed the workbook provided and was able to recreate the 57.23% forest loss for the project area. This finding is closed. 3. The VVB reviewed Section E1 of the GHG plan and acknowledges that the reporting language has been updated to accurately reflect the data reported in Table E6. This finding is closed. 4. The VVB discussed this finding in a call with TCT and understands the relevance due to proximity. Further, the VVB notes that it is not erroneous to include these properties in the assessment. This finding is closed.

Item Number	31

ACR IFM Methodology January 2022, v2.0 (Section)	2.4 ADDITIONALITY
ACR IFM Methodology January 2022, v2.0 (Description)	2) providing a descriptive comparison of the expected carbon sequestration impacts of predominant forest management practices identified in step 1 in relation to with-project scenario management, and
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section C4
Aster Global Round 1 Findings (15 January 2024)	It is unclear how the exercise comparing merchantable cu ft of the project against similar FIA forest type groups across Oregon meets this requirement as it compares merchantable volume.
Round 1 NCR/CL/OFI	CL: Please clarify in line with finding
Round 2 Response from Project Proponent (28 March 2024)	This excersize has been updated to compare aboveground carbon by forest type and land status on the Oregon Coast Range (Table C2) with aboveground carbon stocking on the project area (Table C1).
Aster Global Round 2 Findings (25 June 2024)	This finding is closed given that the Common Practice demonstration now uses carbon stock and carbons stock change.

Item Number	32
ACR IFM Methodology January 2022, v2.0 (Section)	2.4 ADDITIONALITY
ACR IFM Methodology January 2022, v2.0 (Description)	3) demonstrating that carbon stocks under with-project scenario management will exceed those of the baseline scenario by the end of the crediting period.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section C4

Aster Global Round 1 Findings (15 January 2024)	Using Table C3, the GHG Plan argues that, because the project activity includes a change in ownership, carbon stocks will increase. However, Table C3 shows no difference in aboveground carbon stocks between corporate and noncorporate lands. In Table C3 as well, all forms of public ownership have higher carbon stocks than private lands; and these all perform harvesting. therefore, it is not clear how this table demonstrates that ceasing of large commercial harvests will increase carbon stocks.
Round 1 NCR/CL/OFI	CL: Please clarify in line with finding
Round 2 Response from Project Proponent (28 March 2024)	Private corporate ownerships have a -0.57 mtCO2e/ac/yr mean carbon sequestration rate, while private non-corporate ownerships have a +2.29 mtCO2e/ac/yr mean sequestration rate (GHG Plan, Table C3). Therefore, it is reasonable to conclude that transitioning ownership from corporate to non-corporate ownership will result in icreased carbon stocks. The highly intensive management style of corporate forest management is also detailed in Section C4 and is contrasted with NCLC's planned management approach. The text of the final paragraph of section C4 has been edited for clarification: Tables C2 and C3 both demonstrate the forest carbon gains that can be realized by reducing harvesting pressure on timberlands. North Coast Land Conservancy will realize these gains by managing towards late-seral forest conditions and choosing not to implement large commercial harvests, thereby increasing carbon sequestration rates compared to corporate private ownerships.
Aster Global Round 2 Findings (25 June 2024)	While private corporate and private non-corporate lands have similar carbon stocks as of the time of the analysis (AG mtCO2e/acre), these ownership classes have very different rates of carbon accrual (Total mtCO2e/acre/yr). The VVB notes the GHG Plan has been revised to make this more explicit. This requirement is met.

Item Number	33
ACR IFM Methodology January 2022, v2.0 (Section)	3 STRATIFICATION
ACR IFM Methodology January 2022, v2.0 (Description)	Stratification defined by parameters closely correlated to forest carbon stocks will decrease the likelihood of a required uncertainty deduction (section 7.4). If stratifying, Project Proponents must present in the GHG Project Plan an ex ante stratification of the project area. The number and boundaries of the strata defined ex ante may change during the crediting period (ex post).
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y

Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan CoastalEdge_Strata_wRMACEDS.shp
Aster Global Round 1 Findings (15 January 2024)	According to the GHG Plan "In short, strata were delineated based on forest composition and land use history using a combination of 2018 plot data, LEMMA data , USGS Digital Elevation Model and OSIP 2018 data. The strata include the LOW stratum (stand stock with <100 ft2/acre basal area), the MEDIUM stratum (stand stock with 100-250 ft2/acre of basal area), the HIGH stratum (stand stock with >250 ft2/acre of basal area), the STEEP stratum (>120% slope)". The VVB used LEMMA data to classify the project area following the basal area breakpoints described above. The VVB found that 24%, 68% and 8% of the project area fell within the LOW, MED, and HIGH strata, respectively. This differs greatly from the acreage proportions of 19%, 36% and 44% in CoastalEdge_Strata_wRMACEDS for the LOW, MED, and HIGH strata, respectively.
Round 1 NCR/CL/OFI	CL: Please provide sufficient description of the stratification procedure and/or intermediate geospatial products and analyses.
Round 2 Response from Project Proponent (28 March 2024)	Apologies for the confusion here. The LEMMA data were only used in stands where we did not have data from previous inventories to use in the inventory design. The text in the GHG plan of section E2 has been updated in line with the findings.
Aster Global Round 2 Findings (25 June 2024)	The VVB appreciates the clarifying revised text. As multiple data sources were used, thereby implying stratification was a multistep process, the VVB searched for a Stratification SOP and failed to find one. The VVB has issued a finding for this in reference to a different requirement in Section 3; but this specific finding is resolved. Closed.

Item Number	34
ACR IFM Methodology January 2022, v2.0 (Section)	4.1
ACR IFM Methodology January 2022, v2.0 (Description)	Baseline silvicultural prescriptions must perpetuate existing onsite timber producing species while fully utilizing available growing space and must be relevant to the forest type(s), ecological condition(s), and/or species/product mixture of the project area. Prescriptions must be substantiated according to the requirements of section 4.1.1.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y

Evidence Used to Assess (Location in PD, MR or Supporting Documents	Harvest Schedule for Profit_adapted to start date.pdf, CoastalEdge NPV_Analysis_20231004.xlsx, GHG Plan Section E1
Aster Global Round 1 Findings (15 January 2024)	It is unclear to the VVB whether existing onsite timber producing species not planted (e.g. Douglas fir, Pacific silver fir) will be perpetuated. The GHG Plan states: "After harvest, stands are replanted in western hemlock-Sitka spruce mixtures at 435 trees per acre in line with common practice at comparable sites", referencing a publication from 1998. This publication states "Because Sitka spruce and western hemlock can seed in and establish quickly on many coastal sites, natural Douglas-fir may be excluded. Therefore, in order to ensure the presence of some Douglas-fir in your stand, you may need to hand plant this species.". Therefore, it is unclear why Douglas-fir planting was not used in the baseline. Further, it is unclear to the VVB whether the publication is still relevant concerning common practice in the region. Further, the project assumes 400 TPA natural regeneration also occurs. It is unclear to the VVB whether this is a reasonable assumption and/or common practice in the region.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 2 Response from Project Proponent (28 March 2024)	1. We have addressed this by replanting with a mixture of western hemlock, Sitka spruce, Douglas fir, and red cedar. This has been added to the GHG Section E1 and the document 'Harvest Schedule for Profit_adapted to start date_2024_DanC.pdf'. 2.We have revised the natural regeneration expectation down to 200 TPA, based on the average stocking of 'Low' strata plots. Natural regeneration can produce dense stands of western hemlock (over 800 TPA), but this is highly variable and dependant on site factors as well as the availability of seed trees nearby. Therefore, we have opted to use the observed average stocking of our youngest stands (LOW strata).
Aster Global Round 2 Findings (25 June 2024)	1. The VVB reviewed the forester attestation and notes that the species mixture used to replant is supported. This is pending the finding related to the forester's professional forester designation. 2. The VVB has issued a finding for a similar requirement regarding natural regeneration levels. This is pending.
Round 2 NCR/CL/OFI	
Round 2 Response from Project Proponent (05 August 2024)	
Aster Global Round 3 Findings (16 August 2024)	
Round 3 NCR/CL/OFI	

Round 3 Response from Project Proponent (27 August 2024)	
Aster Global Round 4 Findings 27 September 2024	This item is addressed.

Item Number	35
ACR IFM Methodology January 2022, v2.0 (Section)	4.1
ACR IFM Methodology January 2022, v2.0 (Description)	All legally binding constraints to forest management (with the exception of easements enacted less than 1 year before or less than 3 years after the project start date) must be considered in baseline modeling. These include all existing laws, regulations, legal rulings, deed restrictions, and other relevant regulatory frameworks (such as legally binding terms and conditions associated with the land acquisition, or donor funding restrictions regulating the amount or type(s) of timber harvest that can occur on the property). Best management practices to protect water, soil stability, forest productivity, and wildlife, as published or prescribed by applicable federal, state, or local government agencies are also considered legally binding constraints to forest management. The resulting harvest schedule is used to establish baseline stocking levels throughout the crediting period. If new legal constraints are enacted during a crediting period that legally prohibit the modeled silvicultural practices or harvest removals, the baseline must be evaluated and re-modeled as necessary on a forward-moving basis, respecting these legally binding constraints for the remainder of the crediting period.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Harvest Schedule for Profit_adapted to start date.pdf, CoastalEdge NPV_Analysis_20231004.xlsx, GHG Plan Section E1

Aster Global Round 1 Findings (15 January 2024)	The GHG Plan states that the Onion Peak easement has been excluded from harvestable area. Comparing the paper map (OnionPeak_map.pdf) against the stratification shapefile, it is not obvious that this are was excluded. Section E1 of the GHG Plan describes legal constraints applicable to the baseline scenario. These were sourced from the 2022 and 2023 Oregon Forest Practice Act, which establishes no-harvest zones around riparian zones and unstable slopes. The project removes "Steep" slopes from the project area and RMZs are conservatively all designated as no-harvest zones. Reforestation plans exceed the FPA requirements for a harvest type 3 at 865 TPA (which is greater than 200 TPA required by the FPA). The harvest schedule states: "The process used in this analysis was the creation of GIS polygons representing the net harvestable acres to identify large, but manageable sized harvest units separated by a minimum of a 300' buffer." It is unclear to the VVB how this procedure accounts for harvest size limitations outlined in the FPA. In summary, it is unclear to the VVB whether the number of acres harvested in the HIGH and MEDIUM strata is possible under the legal constraints of the FPA.
Round 1 NCR/CL/OFI	CL: Please provide a shapefile of conservation easements. NCR: Please ensure all harvest activities in the baseline are in compliance with relevant laws, regs, statutes, etc.
Round 2 Response from Project Proponent (28 March 2024)	The Core Area of the Onion Peak easement was excluded from baseline harvesting. However, the Consulting Area of the easement was subject to normal baseline harvest practices. Easement shapefiles have been provided in the 'Easements' folder in our response package. A shapefile of the harvesting schedule is provided as 'CoastalEdge_HarvestPlan20240318_Strata20240124_Intersect'. We note that the number of acres harvested in the high and medium strata each year has changed slightly from what was originally modeled and described in the GHG plan.
Aster Global Round 2 Findings (25 June 2024)	Areas within the project area may be subject to constrains details in Forest Practices Technical Note Number 2 (Effective Jan 1 2003). Specifically, High landslide hazard locations (slopes greater than 80% or headwalls steeper than 70%) may be present based on the Proponent's analysis of slope within the project area. This note provides a matrix for determining public safety risk and the consequential limitations to timber harvesting. It is unclear how the Project has taken the statutes listed in the Technical note into consideration given there may be public safety risk (e.g. homes and road infrastructure, particularly Hwy 101)
Round 2 NCR/CL/OFI	CL: Please clarify with regards to potential limitations on the baseline scenario posed by Technical Note Number 2

Round 2 Response from Project Proponent (05 August 2024)	We reached out to ODF staff and requested their opinion on harvest restrictions related to Downslope Safety Risk for the project area. No applicable restrictions were found—please see '*The Climate Trust Mail - Downslope safety risk.pdf*' in the R2 - Supporting Materials folder.
Aster Global Round 3 Findings (16 August 2024)	The Proponent's response demonstrates that the Project has taken into consideration this potentially applicable constraint. The VVB reviewed The Climate Trust Mail - Downslope safety risk.pdf. The VVB notes that the ODF representative is a registered geologist who stated that "no structures or roads were within a further review area and hence, no harvest restrictions". The VVB is reasonably assured all constrains have been taken into consideration and adequately documented in the GHG Plan.

Item Number	36
ACR IFM Methodology January 2022, v2.0 (Section)	4.1
ACR IFM Methodology January 2022, v2.0 (Description)	Required inputs for the project NPV calculation include the results of a recent forest inventory of the project lands, prices for wood products of grades that the project would produce, costs of logging, reforestation and related costs, silvicultural treatment costs, and relevant carrying costs. Project Proponents shall include roading and harvesting costs as appropriate to the terrain and unit size, and timber included in baseline harvest must be demonstrably accessible and operable. Project Proponents must model growth of forest stands over 100 years. Project Proponents may use a constrained optimization program that calculates the maximum NPV for the harvesting schedule while meeting any forest practice legal requirements. The annual real (without inflation) discount rate for each non-federal timber ownership class given in Table 1 must be applied. Wood products must be accounted and included in the calculation of ERTs (Equation 24).
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	CoastalEdge NPV_Analysis_20231004.xlsx, GHG Plan Section E1 Forest Management Plan

Aster Global Round 1 Findings (15 January 2024)	The GHG Plan states: "Road maintenance costs of $500,000 were also included as a per-acre rate of $250/ac. Road maintenance costs are based on rough estimates from the property forester." The VVB notes that road maintenance cost estimates have not been substantiated by verifiable evidence. Further, it is unclear what is included in the road maintenance costs, i.e. is new road construction included in this per acre cost. Second, the VVB notes that the nominal rate reported on the "assumptions" tab of the NPV analysis workbook appears to be incorrect given the inflation rate and real rate. Third, the NPV Analysis is pending findings related to project area above. Fourth, it is unclear if typical stumpage prices are representative of the revenues for areas identified in the forest management plan as impractical for cable or ground based logging but only helicopter logging.
Round 1 NCR/CL/OFI	CL: Please provide verifiable evidence or an attestation from a qualified professional to support the estimated cost of road maintenance per acre. CL: Please clarify in line with the finding regarding rates CL: Please clarify in line with sub-finding related to helicopter logging
Round 2 Response from Project Proponent (28 March 2024)	1. $500,000 was a conservative estimate based on preliminary results of a road survey that was being undertaken on the project area. The purpose of the road survey was to identify management needs prior to road decomissioning, so those results are not directly attributable to an intensive harvesting scenario. Based on the current road conditions, however, Ben Hayes, the forester who did this work, and who has worked on the property prior to its acquisition by North Coast Land Conservancy, was able to provide an estimate of costs to access timber accross the property. His updated estimate is $350,000 for the Rainforest Reserve property. This includes brushing, culvert cleaning, ditch cleaning, and applying surface rock (email on 2/15, *The Climate Trust Mail - Road costs and PCT.pdf*). In this email he confirms that the price should be applied per acre. We have reduced the road maintenance costs to align with this estimate. 2. We have used the discount rate for the NPV calculation. Hence, the nominal rate in the "assumptions" tab has been removed to avoid confusion. 3. NA - all the NPV finding has been addressed. 4. We do not expect that helicopter logging would be required for this project area. References to helicopter logging in the Rainforest Reserve management plan are related to a conservation-focused management strategy where the central focus is avoiding disturbance to the property. However, the baseline scenario is management under an industrial forest owner.

Aster Global Round 2 Findings (25 June 2024)	1. The road cost has been substantiated by an email from Ben Hayes of Springboard Forestry LLC. This finding is closed. 2. The VVB confirms that the appropriate discount rate is used in the NPV analysis. This finding is closed. 4. It is unclear to the VVB how the project proponent determined that helicopter logging is not required for the project area. The VVB notes that cable logging systems are appropriate for the maximum slopes included in the project area, however it is unclear if slope convexity has been considered in making the determination on whether an area is harvestable via ground-based or cable logging. Thus, it is unclear if excluding the cost of helicopter logging is justified. 5. The VVB notes that the project reports in Section C5 of the GHG Plan that the NPV of the baseline scenario is $37.6 million. However, the cost of the thinnings that occur in the high and medium stratum accounted for in the NPV analysis workbook are not present value costs accounting for the real rate, but rather inflated costs at year 15.
Round 2 NCR/CL/OFI	CL: Please clarify in line with findings #4 and #5 and update reporting documentation and/or calculation workbooks as necessary.
Round 2 Response from Project Proponent (05 August 2024)	4. We spoke with the ODF Stewardship Forester for the Astoria District, where the project is located, about the need for helicopter logging on the project area. This conversation was conducted both by phone and over email ('The Climate Trust Mail - ODF follow up.pdf'). The ODF staff member communicated that helicopter logging is not commonly used in the local area. Technological advancements such as drones have enabled cable logging to be effective virtually anywhere there is access to install a tailhold within 7,000 feet of a harvesting operation. This video by Rayonier is a useful illustration of drones facilitating logging on difficult terrain. ODF stewardship foresters are aware of forest management across their district because all harvesting must be reported to ODF through FERNS, the Forest Activity Electronic Reporting and Notification System. The single instance that the ODF forester recalled helicopters being used is a project in southern Oregon where tailhold siting access was denied on BLM land due to their own internal policies. 5. Thank you for this correction. The per acre thinning costs are now the NPV of these costs accounting for the real rate. We have updated the 'harvest_sched' tab of the NPV analysis workbook (CoastalEdge NPV_Analysis_20240715.xslx) and Sections C5 and E1 in the GHG plan.

Aster Global Round 3 Findings (16 August 2024)	4. The statements from ODF forests in "The Climate Trust Mail - ODF follow up.pdf" provides reasonable assurance that helicopter logging is conventionally not used in the region as cable yarding is not limited. 5. The VVB notes that the costs of the pre-commercial thinnings for some PCTs have been added. However, it is unclear to the VVB why the NPV analysis does not include the cost of the pre-commercial thinnings in year 2040. 5a. The VVB notes that the per acre cost of road maintenance reported in the GHG Plan is discrepant with the road maintenance cost applied to the NPV workbook. 6. The VVB notes that in the NPV_Grow tab the reforestation and thinning costs do not appear to be accounted for in the correct year. For example, for a harvest in 2022, reforestation costs would be incurred in year 2023 and thinning costs would be incurred in year 2035. While the VVB does not believe this changes the outcome of the NPV analysis this does appear to be an error
Round 3 NCR/CL/OFI	CL Please clarify in line with Findings 5, 5a, and 6 and provide updated quantification and updated Project Documentation as necessary.
Round 3 Response from Project Proponent (27 August 2024)	5. The cost for pre-commercial thinning in 2040 has been applied in the NPV analysis workbook (*CoastalEdge NPV_Analysis_20240816.xlsx*) in line with the findings. This change has also been reflected in the GHG plan table E7 with an addition of the PCT in the High and Medium strata. 5a. Per-acre road maintenance costs reported in the GHG Plan have been aligned with the values used in the NPV analysis workbook. 6. Discounted reforestation and thinning costs in the NPV_Grow tab have been applied one year and 13 years after harvest, respectively, in line with the finding (*CoastalEdge NPV_Analysis_*.xlsx*). The updated NPV revenue values have been added to the relevant sections of the GHG plan (Table E3 and Section C5).
Aster Global Round 4 Findings 27 September 2024	5a. The VVB confirmed that the GHG plan has been correctly updated. This finding is closed. 6. The VVB reviewed the updated NPV Analysis and confirms that the analysis appropriately accounts for reforestation and thinning costs. The VVB notes however, that in the "hrvst_sched" tab, reforestation costs are not accounted in the year subsequent to harvest. As this does not result in a material error, nor are these values reported in project documentation, the VVB is issuing an OFI.
Round 4 NCR/CL/OFI	OFI: The VVB notes that the hrvst_sched tab of the NPV analysis workbook should include reforestation costs in the appropriate year.

Item Number	37
ACR IFM Methodology January 2022, v2.0 (Section)	4.1
ACR IFM Methodology January 2022, v2.0 (Description)	The baseline scenario's harvested timber output must not exceed regional mill capacity for the species and size forest products produced throughout the crediting period. Mills must be within hauling distances that allow the baseline's forest management activities to be economical. The feasibility of the baseline harvest regime must be demonstrated with mill reports, testimony from a professional forester, published literature from a state or federal agency, or other verifiable evidence
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section E1
Aster Global Round 1 Findings (15 January 2024)	Section E1 of the GHG Plan states: "the large baseline harvest in 2022 would represent 33% of the timber harvested in Clatsop County (188,835 MBF in 2022) and just 1% of the 6.1 billion board feet harvested in Oregon in 2022", however it is unclear to the VVB whether this purports that the harvested timber output does not exceed regional mill capacity for the species and size forest products. Further, it is unclear whether mills are within hauling distances that allow the baseline to be economical.
Round 1 NCR/CL/OFI	CL:Please clarify in line with the finding and update reporting documentation as necessary.
Round 2 Response from Project Proponent (28 March 2024)	As the baseline harvest is less than recent harvest volumes for the county, and just 1% percent of the state-wide harvest volumes, the baseline harvested output does not exceed regional mill capacity. Please note that the board foot volumes for the baseline harvest in 2022 have been updated in the GHG plan as described in the response to Finding 35 above. There are 38 sawmills operating in the Northwest region of Oregon as reported by Oregon State University's Forest Industry Directory. This information has been added to section E1 of the GHG Plan.

Aster Global Round 2 Findings (25 June 2024)	1. Thank you for the clarification. The VVB reviewed the updated GHG Plan and specifically the 2023 County Fact Sheets from the Oregon Forest Resources Institute and the Oregon State University - Forest Industry Directory. Furthermore, the VVB reviewed FIA estimates for average annual removals of sound bole wood volume on timberland. The VVB is reasonably assured that there is sufficient mill capacity in the region to support the baseline harvests. This finding is closed. 2. The VVB counted 38 log buyers in the Northwest region of Oregon from the Oregon State University's Forest Industry Directory. The information was added to Section E1 of the GHG plan provided. Pages 34 and 35 of the GHG plan provided cites a USDA Transportation Services Division/Agricultural Marketing Services report to substantiate that there are timber haul routes throughout the general area. The VVB is reasonably assured that distance to markets is not a limiting factor for baseline harvests. This finding is closed.

Item Number	38
ACR IFM Methodology January 2022, v2.0 (Section)	4.1.1 Baseline Reporting
ACR IFM Methodology January 2022, v2.0 (Description)	A general description of the baseline management scenario over the crediting period, including how the baseline scenario compares to regional common practice.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan FVS key files Duddles and Fitzgerald 1998 Forest Management Plan

Aster Global Round 1 Findings (15 January 2024)	The descriptions of cutting include clearcutting in the second and fifth year since project start for the HIGH and MED strata, each. The stands receive a precommercial thin (PCT) at years 13, 21, 4 for the HIGH, MED, and LOW strata, respectively. The timing of PCT are common practice according to the OSU Extension publication. This publication recommends thinning to 300-400 tpa whereas the project's baseline thins to 280; it is unclear in the GHG Plan how 280 tpa was chosen. The VVB notes the PCT leaves stocking below recommended density management guidelines from Duddles and Fitzgerald, e.g. if the QMD is 6", there should be between 491 and 770 tpa. However, the PCT results in roughly 255, 350, and 275 trees per acre when the QMD is 6", according to the project's FVS simulations. Second, the FMP provided to the VVB suggests "Young stands with diameters that average less than 10 inches DBH and exceed 450 TPA should be thinned to no more than 350 - 450 TPA". It is unclear to the VVB if this guidance in the FMP is considered. Third, it is unclear if the acreages of areas subject to clearcutting are feasible given that the Forest Management Plan has conducted a geospatial analysis of harvestable acres, given topography, infrastructure and landslide hazard, and found a different amount of acres which can be feasibly harvested. Fourth, the VVB notes all worksheets such determining the growing stock or harvested wood products stock implicitly assume all clearcuts occur before the growing season (May). It is unclear if this is accurate, noting the forest management plan states "any activities utilizing wheeled or tracked equipment should be scheduled for the summer or fall".
Round 1 NCR/CL/OFI	CL: Please clarify silvicultural specification CL: Please clarify on feasibility of harvestability across the project area CL: Please clarify on timing of harvests

Round 2 Response from Project Proponent (28 March 2024)	1. We have updated the PCT treatment to leave a residual 350 TPA, in line with the OSU Extension publication. The 280 TPA prescription that was applied in 2023 was chosen to guard against windthrow and to increase the time between thinning entries to each stand. Ben Hayes, the property forester who designed the treatment, clarified that landowners managing on shorter rotations may leave a higher residual TPA (see 'The Climate Trust Mail - Road Costs and PCT.pdf'). As our baseline forest owner is a private industrial landowner, opted to revise the PCT TPA to 350. 2. Yes, the plan states that 350-450 TPA is the maximum density for young stands. Please also note that this is an interim plan that is undergoing the process of revision. 3. The referenced management plan was written by a non-profit organization with the primary objectives of restorating and conservating coastal temperate rainforests, healthy streams, and rare, high elevation habitats. North Coast Land Conservancy's plan (which is in the process of revision) is therefore less agressive than a private industrial landowner would be. Many of the areas that NCLC has designated as passive management zones in this plan were previously logged by prior industrial property owners. In terms of topography, ODF forester Bryce Rogers confirmed via email that harvests on slopes up to 120% (not modeled as Slope Retention Areas - The Climate Trust Mail - Slope threshold.pdf). The average and 90th percentile slopes of each strata have been added to the GHG Plan Table E8 for additional context. 4. The impact of all management is shown in the year following the treatment. Please see the "FVS SnagDet_CoastalEdge.xlsx" for example.

Aster Global Round 2 Findings (25 June 2024)	1. The VVB confirms that the Proponent has updated FVS and the GHG Plan to a residual level of 350 TPA following PCT. However the statement "Young stands are treated with a pre-commercial thin to 350 TPA at 12 years of age to maintain vigor" does not have a reference so it is unclear to the reader that the OSU Publication is the basis for this prescription. 2.The VVB appreciates this clarification. Closed. 3a. The Proponent has clarified that what is considered 'harvestable' was defined more conservatively in the Forest Management Plan than what might actually be harvestable where timber extraction is the primary resource use for a private industrial landowner. The email from the mentioned ODF forester stated any areas not designated as slope retention areas can be subject to harvesting. Within the 2007 Forest Inventory & Management Units table of the Forest Management Plan, this sufficiently explains that stands considered too steep to harvest may actually be harvested by an industrial owner. 3b. The VVB also notes that the relevant table is E9, not E8. Given the VVB has issued a similar finding regarding mis-matches of table references within text vs the table captions, the VVB requests the Proponent ensure all table references in-text correctly refer to the table captions. 4. The VVB appreciates this clarification. Closed.
Round 2 NCR/CL/OFI	CL: Please provide a reference in the GHG Plan supporting the residual level of 350 TPA following PCT. CL: Please ensure all table references in-text correctly refer to the table captions.
Round 2 Response from Project Proponent (05 August 2024)	1. The OSU Extension publication (Duddles & Fitzgerald 1998) has been included as a reference to this statement on thinning to 350 TPA in the GHG Plan.
Aster Global Round 3 Findings (16 August 2024)	The VVB reviewed revisions to Coastal Edge GHG Plan_20240805 to assess the Proponent's response. 1) Now all important details describing the choice of the baseline scenario, it's relevance to ecological conditions and the project area, and comparison to regional common practice, are sufficiently described. Supporting sources include scientific literature, 'grey material (i.e. publications from natural resource agencies) supporting the notion that the baseline silvicultural prescription is employed within similar forests of the region. 2) All in-text table references correctly refer to tables within the GHG Plan.

Item Number	39
ACR IFM Methodology January 2022, v2.0 (Section)	4.1.1 Baseline Reporting

ACR IFM Methodology January 2022, v2.0 (Description)	Descriptions of baseline silvicultural prescriptions, including trees retained, harvest frequency, and regeneration assumptions. One or more of the following sources must substantiate the choice of baseline silvicultural prescriptions and their relevance to the ecological conditions of the project area:
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan FVS key files FVS CutList table Duddles and Fitzgerald 1998
Aster Global Round 1 Findings (15 January 2024)	Sprouting in FVS is turned off for the High and Med strata but not the Low strata, and indeed the Low strata does have sprouting in 2032 after the precommercial thinning. It is unclear why sprouting is treated differently across strata as this is not described in the GHG plan. It is also unclear how the project decided to plant 435 seedlings per acre. This is not directly recommended in the cited OSU publication. The FVS simulations include clearcutting across the entire range of tree DBH. It is unclear if it is appropriate or realistic to clearcut trees as small as 0.50" DBH. The FVS simulations include precommercial thinnings across the entire range of tree DBH. It is unclear if it is appropriate or realistic; the VVB notes the prior forest management plan recommended targeting shorter trees. Third, it is unclear how the pre-commercial thins were considered pre-commercial, given the bsl_hwpproj workbook demonstrates merchantable volume is present at time of thinning Fourth, the GHG plan states that reforestation exceeded FPA requirements. Noting that the forestland is taxed using forestland classes FB through FG, implying a mix of productivity classes and therefore reforestation requirements across the property, this section requires greater specificity stating what the FPA requirement is in the project area.
Round 1 NCR/CL/OFI	CL: Please clarify the reasoning for treating sprouting differently across strata CL: Please clarify silvicultural specification

Round 2 Response from Project Proponent (28 March 2024)	1a. Sprouting has been turned off for the low strata. 1b. The Duddles paper recommends planting at least 400 seedlings per acre to assure "prompt reforestation and early capture of the site by trees." 435 seedlings per acre are commonly used in reforestation because it is 10x10 spacing, a practical design for planters. 2a. The lower DBH for clearcut has been changed to 1" DBH in line with the finding. 2b. Thanks for finding this. We have changed the thinning to "thinning from below" per the forest management plan. We have updated the excel workbook in line with the FVS run. 3. The HWP workbook has been updated using the FVS CutList output, which does not show merchantable volume after pre-commercial thinning as we increase the retained TPA to 350/acre (refer to the response for finding 38). Please consult the workbook (CoastalEdge_bsl_hwpproj.xlsx). 4. Section E1 was amended with the following detail on FPA requirements: "After harvest, stands are replanted in western hemlock-Sitka spruce mixtures at 435 trees per acre in line with common practice at comparable sites and exceeding FPA requirements which require a minimum of 100-200 seedlings per acre depending on site class."

Aster Global Round 2 Findings (25 June 2024)	1a. The VVB has confirmed that sprouting has been turned off for the low strata. 1b. The GHG Plan states "After harvest, stands are replanted with a mixture of western hemlock, Sitka spruce, Douglas fir, and red cedar at 435 trees per acre in line with common practice at comparable sites" and "Natural regeneration was also modeled after harvest with an additional 200 trees per acre of natural regeneration of western hemlock and red alder". The VVB notes the FVS simulations include plantings of 131 DF/acre, 131 WH/acre, 87 SS/acre, and 87 RC/acre. Additionally, there are 150 WH/acre and 50 RA/acre which are natural regen. These keywords are in line with the description in the GHG Plan. However, the VVB is not clear how the Duddles paper was used as the basis for the plantings and notes no reference is given for the natural regeneration levels. The VVB notes that these same regeneration levels are provided by Harvest Schedule for Profit_adapted to start date_2024_DanC.pdf but the text in the GHG Plan does not cite this attestation as the basis for regeneration levels. The Duddles pub states 400 DF/acre is often required to capture the site "Because Sitka spruce and western hemlock can seed in and establish quickly on many coastal sites, natural Douglas-fir may be excluded", and " Often, clearcut areas reseed readily and abundantly with western hemlock and Sitka spruce". It is not clear why this recommendation for DF planting is used for all species, including those that prolifically seed. 2a. The VVB notes that the FVS THINDBH keyword parameter for the lower DBH has been changed to 1" DBH. Closed. 2b. The FVS simulations now use the THINBTA keyword. Closed. 3. The VVB can confirm in the FVS .out files that the revised retention level after thinning does only remove non-merch trees. Closed. 4. The revision to Section E1 sufficiently clears the FPA reforestation requirement threshold; this makes it clear that the FPA requirement is met regardless of site class. Closed
Round 2 NCR/CL/OFI	CL: Please clarify with respect to how Duddles or other reputable sources were used to establish the species-specific levels of regeneration. Please ensure that a reference is included in the GHG Plan for the rationale of natural regeneration levels.

Round 2 Response from Project Proponent (05 August 2024)	1b. The text and associated footnote in Section E1 of the GHG Plan was updated to clarify how the Duddles paper was used to inform regeneration in the baseline scenario. The authors of the Duddles paper state that planting recently harvested units with at least 400 seedlings per acre assures early capture of the site by desirable trees species, and maintaining a mixed stand of western hemlock, Douglas-fir, western redcedar, and some Sitka spruce increases within-stand diversity and may offer the best protection against pests such as the Sitka spruce weevil and Swiss needle cast. For the baseline, post-harvest artificial regeneration is modeled at 435 trees per acre consisting of a mixture of western hemlock, Sitka spruce, Douglas fir, and red cedar consistent with the Duddles pub and in line with the species that are currently found on the project site and adjacent industrial ownerships. Natural regeneration was also modeled after commercial harvests with an additional 200 trees per acre of western hemlock and red alder; the plots in our youngest strata (Low strata) averaged about 600 TPA and included a substantial component of these species. The regeneration assumptions used in this baseline scenario exceed FPA requirements which require a minimum of 100-200 seedlings per acre depending on site class.
Aster Global Round 3 Findings (16 August 2024)	The VVB reviewed revisions to Coastal Edge GHG Plan_20240805 to assess the Proponent's response. 1) Now most important details describing the choice of the baseline scenario, it's relevance to ecological conditions and the project area, and comparison to regional common practice, are sufficiently described. Supporting sources include scientific literature, 'grey material (i.e. publications from natural resource agencies) supporting the notion that the baseline silvicultural prescription is employed within similar forests of the region. 1a) However, it is unclear what qualifying source is used to evidence the harvest intensity or scheduling of acres harvested. 1b) Additionally, in order to check assumptions regarding the number of acres harvested in each year and stratum, the VVB is requesting the shapefile undergirding the harvest scheduling. 2) All in-text table references correctly refer to tables within the GHG Plan.
Round 3 NCR/CL/OFI	CL: Please clarify what evidence is used to evidence the harvest intensity or scheduling of harvests CL: Please deliver the shapefile used to allocate harvests
Round 3 Response from Project Proponent (27 August 2024)	1a. The term 'harvest intensity' is not defined in v2.0 of the methodology. The baseline is NPV maximization considering all legal and operational constraints to forest management. Table E6 demonstrates that the scale of baseline harvesting is common practice for the region, particularly for private industrial landowners. 1b. This shapefile was provided to the VVB in Round 2 as *CoastalEdge_HarvestPlan_Intersect_clean_20240805.zip*

Aster Global Round 4 Findings 27 September 2024	1a. Thank you for the clarification. This item is closed based on the HarvestPlan shapefile provided by the Project. 1b. Thank you for the clarification, the VVB reviewed the shapefile and is reasonably assured the harvest plan demonstrates that the harvest plan aligns with the FPA. This finding is closed.

Item Number	40
ACR IFM Methodology January 2022, v2.0 (Section)	4.1.1 Baseline Reporting
ACR IFM Methodology January 2022, v2.0 (Description)	Publications, statements, or attestations from state or federal agencies;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Duddles and Fitzgerald 1998
Aster Global Round 1 Findings (15 January 2024)	The planting densities after clearcutting reference an OSU Extension publication. That publication recommends 1-1 seedling stock that are 18 inches tall, however the FVS simulations assume these are 1-0 seedling stock that are 12 inches tall.
Round 1 NCR/CL/OFI	CL: Please clarify in line with finding
Round 2 Response from Project Proponent (28 March 2024)	The seedling stocks and height of the seedlings on the FVS run have been changed to 1-1 (by changing the "Average Age" to 2 years) and 18 inches respectively, following the OSU extension publication in line with the findings.
Aster Global Round 2 Findings (25 June 2024)	The VVB confirms these changes have been made to keywords in FVS

Item Number	41
ACR IFM Methodology January 2022, v2.0 (Section)	4.1.1 Baseline Reporting
ACR IFM Methodology January 2022, v2.0 (Description)	Written statements or attestations from a regional professional forester(s);

Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Harvest Schedule for Profit_adapted to start date.pdf
Aster Global Round 1 Findings (15 January 2024)	The GHG Plan references a "We requested a high-level harvest plan from a professional forester with inventory experience at the project area and who had previously worked for a local Timber Investment Management Organization (TIMO) in the region." The VVB was unable to confirm the credentials of the regional professional forester cited.
Round 1 NCR/CL/OFI	CL: Please provide written statements or attestations from a regional professional forester(s) that are verifiable.
Round 2 Response from Project Proponent (28 March 2024)	We worked with Dan Cummins to create the high-level plan, which applies common practice silviculture to the project area. Dan's resume 'DC Resume 2024.pdf' has been added to the 'R1 - Supplemental materials' folder. While we followed Dan's suggestions for timing and a potential/hypothetical layout of harvests on the project area, all aspects of the baseline are in line with common practice silviculture as documented in the Extension publications, academic literature, data on Oregon timber harvests, and regional mill capacity cited in the GHG Plan.
Aster Global Round 2 Findings (25 June 2024)	The Methodology defines a professional forester as "An individual engaged in the profession of forestry. If a project is in a jurisdiction that has professional forester licensing laws, the individual must be credentialed in that jurisdiction. Otherwise, the individual must be certified by the Society of American Foresters or Association of Consulting Foresters." The VVB reviewed the CV of the forester and it does not appear that the forester is currently certified by SAF or ACF.
Round 2 NCR/CL/OFI	CL: Please clarify how the individual forester authoring Harvest Schedule for Profit_adapted to start date.pdf meets the definition of a professional forester.
Round 2 Response from Project Proponent (05 August 2024)	The forester we worked with to gain insight into local harvest practices does not have current SAF certification. He was certified in the past, has extensive work experience with industrial landowners in the area, and has intimate knowledge of the project site through doing the forest inventory. We have replaced the phrase ‘professional forester’ with simply ‘forester’ in the GHG plan to clarify the credential. We would like to note that while his input was considered regarding the general timeframe and spatial layout of harvest operations, all aspects of the baseline also meet the relevant legal constraints and are in line with extension publications and/or other sources. We worked with the local forester to apply general trends and constraints to our specific project site in a realistic manner. Please let us know if further conversation on this is warranted.

Aster Global Round 3 Findings (16 August 2024)	The Proponent clarifies that professional foresters are not used as a source to substantiate the choice of baseline silvicultural prescriptions and their relevance to the ecological conditions of the project area. This finding is marked pending other findings issued.
Round 3 NCR/CL/OFI	
Round 3 Response from Project Proponent (27 August 2024)	
Aster Global Round 4 Findings 27 September 2024	This item is addressed.

Item Number	42
ACR IFM Methodology January 2022, v2.0 (Section)	4.1.1 Baseline Reporting
ACR IFM Methodology January 2022, v2.0 (Description)	Management records of the silvicultural prescriptions applied in similar forest conditions within the last 10 years; or
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	
Aster Global Round 1 Findings (15 January 2024)	It is unclear why the commercial forestry practices used over the past decade in the project area were not considered in the baseline
Round 1 NCR/CL/OFI	CL: Please clarify in line with finding
Round 2 Response from Project Proponent (28 March 2024)	A comparison of the baseline to past practices on the project area is not a requirement enumerated in Methodology section 4.1.1. The Methodology allows one or a combination of the listed sources to substantiate the baseline prescriptions. For added context, we have added some text describing the size of recent clearcuts on the project area to section E1. BASELINE SCENARIO: *Further constraints to the NPV analysis. A* comparison of the baseline harvesting regime to harvesting on properties adjacent to the project area is also provided in Table E5 of the GHG Plan.

Aster Global Round 2 Findings (25 June 2024)	The Proponent has clarified that it has elected to not use this option for defining the baseline. This is open until closure of findings related to 4.1.1.
Round 2 NCR/CL/OFI	
Round 2 Response from Project Proponent (05 August 2024)	
Aster Global Round 3 Findings (16 August 2024)	The VVB reviewed revisions to Coastal Edge GHG Plan_20240805 to assess the Proponent's response. 1) Now all important details describing the choice of the baseline scenario, it's relevance to ecological conditions and the project area, and comparison to regional common practice, are sufficiently described. Supporting sources include scientific literature, 'grey material (i.e. publications from natural resource agencies) supporting the notion that the baseline silvicultural prescription is employed within similar forests of the region. 2) All in-text table references correctly refer to tables within the GHG Plan.

Item Number	43
ACR IFM Methodology January 2022, v2.0 (Section)	4.1.1 Baseline Reporting
ACR IFM Methodology January 2022, v2.0 (Description)	A list of any and all legal constraints affecting baseline forest management, including:
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan
Aster Global Round 1 Findings (15 January 2024)	The VVB was unable to locate the list, as required.
Round 1 NCR/CL/OFI	NCR: Please add a list of legal constraints in the GHG Plan
Round 2 Response from Project Proponent (28 March 2024)	Legal constraints are provided in GHG Plan section E1: Baseline Scenario: Legal Constraints. The section has been updated include a summary list of legal restraints per this finding.
Aster Global Round 2 Findings (25 June 2024)	Section E1 of the GHG plan provided is updated to include a summary list of the legal constraints affecting baseline management. This finding is closed

Item Number	44
ACR IFM Methodology January 2022, v2.0 (Section)	4.1.1 Baseline Reporting
ACR IFM Methodology January 2022, v2.0 (Description)	If the baseline employs the discount rate of the previous ownership class, evidence of the recent acquisition (< 5 years of project start date) must be provided.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Appendix C - Deeds.pdf
Aster Global Round 1 Findings (15 January 2024)	The VVB notes that the deeds for the property acquisition have been provided, and that Ecotrust Forests II, LLC was the Grantor. It is unclear to the VVB whether Ecotrust Forests II, LLC is an industrial landowner.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 2 Response from Project Proponent (28 March 2024)	The timber ownership classes relevant to Table 1 of the Methodology are described in the 'Description of NPV Calculation IFM on Non Federal U.S. Forestlands v2.0' available on acrcarbon.org. The Private Industrial category consists of forest industry and forest management companies, timber investment management organizations (TIMOs), and other related companies. Ecotrust Forests II, LLC is an investment fund managed by EFM Investments & Advisory, LLC. EFM is the registered investment manager for the Ecotrust fund (one registered investment manager will generally have multiple funds). EFM is the TIMO and the property is held within the Ecotrust fund, which EFM manages. Business Entity Filing Records have been obtained from the State of Oregon business search page (https://sos.oregon.gov/business/Pages/find.aspx) and are provided as supplementary materials.
Aster Global Round 2 Findings (25 June 2024)	The Proponent has clarified the organization type holding the Ecotrust Forests II, LLC and demonstrated that the aforementioned LLC is an industrial landowner

Item Number	45
ACR IFM Methodology January 2022, v2.0 (Section)	4.2

ACR IFM Methodology January 2022, v2.0 (Description)	Baseline stocking levels to be determined for the entire crediting period;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_bsl_live_20231004.xlsx
Aster Global Round 1 Findings (15 January 2024)	The VVB reviewed the "Coastal Edge_bsl_live_20231004.xlsx" workbook and noted the following: 1. The MEDIUM strata harvest schedule does not match the MEDIUM strata harvest schedule outlined in the NPV Analysis workbook or Table E6 in the GHG Plan. Further, this item is pending findings on the FVS tab.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding and update quant files and project documentation as necessary.
Round 2 Response from Project Proponent (28 March 2024)	The baseline live tree workbook (CoastalEdge_bsl_live.xlsx) has been updated to align with the schedule harvest in MEDIUM strata as outlined in the Table E6 of GHG plan and NPV analysis book.
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated workbooks and confirmed that the acres presented across the workbooks are consistent and accurate. This finding is closed.

Item Number	46
ACR IFM Methodology January 2022, v2.0 (Section)	4.2
ACR IFM Methodology January 2022, v2.0 (Description)	Change in baseline carbon stock is computed for each time period. The Project Proponent shall provide a graph of the projected baseline stocking levels and the long-term average baseline stocking level for the entire crediting period (see Figure 1). The year that the projected stocking levels reach the long-term average (time t = T) is determined by either Equation 5 or 6, depending on initial stocking levels. Prior to time T, the projected stocking levels are used for the baseline stock change calculation, as determined by Equation 7. In the year that the projected stocking levels reach the long-term average (time t = T), the baseline stock change calculation is determined by Equation 8. Thereafter, the long-term average stocking level is used in the baseline stock change calculation, as determined by Equation 9, and only with-project growth is credited for the remaining years in the crediting period.

Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan
Aster Global Round 1 Findings (15 January 2024)	It is unclear whether this graph has been provided in project documentation in addition to the ERT workbook.
Round 1 NCR/CL/OFI	CL:Please clarify in line with the finding and ensure the required graph is included in reporting documentation.
Round 2 Response from Project Proponent (28 March 2024)	The graph has been added in the GHG plan, Section E1.
Aster Global Round 2 Findings (25 June 2024)	A baseline stocking graph has been added to Section E1. This finding is closed.

Item Number	47
ACR IFM Methodology January 2022, v2.0 (Section)	4.2
ACR IFM Methodology January 2022, v2.0 (Description)	CBSL,TREE,t and CBSL,DEAD,t must be estimated using models of forest management across the baseline period. Modeling must be completed with a peer reviewed forestry model that has been calibrated for use in the project region and approved by ACR. The GHG Project Plan must detail what model is being used and what variants and calibration processes have been selected. All model inputs and outputs (e.g., plot data, model selection, variant and calibrations, tree list outputs) must be available for inspection by the verifier, and the verifier shall document the methods used in validating the growth and yield model in the validation report.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan

Aster Global Round 1 Findings (15 January 2024)	The project used the FVS-PN variant as opposed to selecting another geographically-appropriate variant, FVS-ON. This is appropriate given PN variant is applicable for the project area. The project adjusted mortality, max SDI, and BAI to calibrate FVS outputs against Hoover et al. 2021. The VVB was able to reproduce this figure, assuming stocks were inclusive of both standing live and standing dead carbon stocks.
Round 1 NCR/CL/OFI	CL: Please clarify if the figure represents both live and dead stocks.
Round 2 Response from Project Proponent (28 March 2024)	Figure E1 includes live tree stocks only. The figure y-axis has been updated to clarify that stocks are live tree carbon. The live tree carbon estimates from FVS output are compared to estimates from Tables A22 and A23 of the Hoover et al. 2021 paper. The Hoover estimates are given in tons carbon/acre; these values were multiplied by *0.907185 (metric tons/US tons) *3.664 (carbon/CO2 equivalent) to yield live tree carbon in mtCO2e/acre.
Aster Global Round 2 Findings (25 June 2024)	The VVB re-created Figure E1 using live tree stocks in the let grow baseline scenario as well as the curves from Tables A23 and A24 in Hoover et al.

Item Number	48
ACR IFM Methodology January 2022, v2.0 (Section)	4.2
ACR IFM Methodology January 2022, v2.0 (Description)	Estimations of dead wood in the with-project scenario may remain static between measurement events, or may be estimated using an approved growth model that predicts dead wood dynamics. Estimations of dead wood in the baseline scenario must be estimated using an approved growth model that predicts dead wood dynamics, if available.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_bsl_sngproj_20231004
Aster Global Round 1 Findings (15 January 2024)	In the baseline, the Project does model dead dynamics by shifting a portion of live trees to dead trees throughout the crediting period. However, the project does not use these when estimating baseline standing dead stocks.
Round 1 NCR/CL/OFI	CL: Please clarify in line with finding

Round 2 Response from Project Proponent (28 March 2024)	We have updated our approach by utilizing the Snag Detection outputs from FVS for each baseline harvest year. Please see '*FVS SnagDet_CoastalEdge.xlsx'.* Standing dead wood was modeled using the FFE extension in FVS under the 'Salvage' keyword. Dead wood is not considered as merchantable in this analysis, as demonstrated in our HWP calculation workbook. The proportion of eligible snags to fell was set at 62% referencing data on the fate of remeasured snags in actively managed stands in western Oregon and Washington. This information has been added to the GHG Plan section E1.
Aster Global Round 2 Findings (25 June 2024)	The VVB has reviewed CoastalEdge_bsl_SnagDet_20240325. This contains a table in the Standing Dead tab and cell A3 states Hardcoded from CoastalEdge_InventoryCalcs_*. However the strata acres appear to not have been updated. Additionally, the mean tCO2e/ac of standing dead does not match the mean tCO2e/ac of standing dead in CoastalEdge_InventoryCalcs_20240325.xlsx
Round 2 NCR/CL/OFI	CL: Please confirm the correctness of mean tCO2e/ac and acres in the Standing Dead tab of CoastalEdge_bsl_SnagDet_20240325.xlsx
Round 2 Response from Project Proponent (05 August 2024)	The acres and the mean tCO2e/ac of standing dead wood has been updated in line with the findings (CoastalEdge_bsl_SnagDet_20240627.xlsx).
Aster Global Round 3 Findings (16 August 2024)	On review of the revised CoastalEdge_bsl_SnagDet_20240627, it is unclear why the Thin Year 5 column under the LOW strata, in the Standing Dead tab, reference different years than are implied in Column H. For example, cell R10, representing 2026 references cell C52 which represents year 2023.
Round 3 NCR/CL/OFI	CL: Please clarify in line with finding and update quantification workbooks, the MR and GHG Plan as appropriate.
Round 3 Response from Project Proponent (27 August 2024)	The *CoastalEdge_bsl_SnagDet_20240816.xlsx* workbook has been updated in line with the finding. Updated values for baseline dead wood stocks have been incorporated into the 'ACR Calcs' and 'ACR Calc RP1' workbooks. TCT and Aster staff discussed the finding related to the Monitoring Report update during our call on 8/19. Baseline dead wood values are not included in the MR, so no change is necessary.
Aster Global Round 4 Findings 27 September 2024	The VVB reviewed the updated "CoastalEdge_bsl_SnagDet_20240816.xlsx" workbook and confirms that the error has been corrected. This finding is closed.

Item Number	49

ACR IFM Methodology January 2022, v2.0 (Section)	4.2
ACR IFM Methodology January 2022, v2.0 (Description)	If a growth model approved for use by ACR does not predict dead wood dynamics, the baseline harvesting scenario may not decrease dead wood more than 50% through the crediting period. If included, standing dead wood must use the same biomass estimation technique (section 4.2.2.1) as live trees.
Applicability to the Project (Y or N/A)	N/A
Requirement Met (Y, N, Pending)	N/A
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_bsl_sngproj_20231004
Aster Global Round 1 Findings (15 January 2024)	Noting the project does use FVS to dynamically model dead stocks, the GHG Plan writes that only those dead trees contributing to baseline carbon stocks include those as-measured. This includes removing all but 2 dead trees per acre for every acre clearcut. However, these stocks fall 60% through the crediting period. Additional findings have been raised regarding the biomass estimation of snags; this portion is pending resolution of those findings.
Round 1 NCR/CL/OFI	CL: Please clarify how the baseline scenario meets this requirement
Round 2 Response from Project Proponent (28 March 2024)	Please see our response to Finding #48.
Aster Global Round 2 Findings (25 June 2024)	The revision to how standing dead trees are modeled has nullified the project's need to adhere to this requirement

Item Number	50
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.2
ACR IFM Methodology January 2022, v2.0 (Description)	Sample size;
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs.docx
Aster Global Round 1 Findings (15 January 2024)	The sample size is appears to be 133 plots; however, the VVB noted that the "Plot Information" tab of the CoastalEdge_InventoryCalcs_20230904.xlsx there appears to be 141 plots, with plot 232 dropped for safety. It is possible that the plots in rows 136-142 were QAQC plots but it is unclear.
Round 1 NCR/CL/OFI	CL: Please clarify why there are 140 plots within the tab and workbook referenced in the VVB's Finding.
Round 2 Response from Project Proponent (28 March 2024)	The plots in rows 136-142 in the Coastal Edge inventory calc spreadsheet were QA/QC plots. These plots have been removed from the Inventory Calcs spreadsheet to avoid confusion.
Aster Global Round 2 Findings (25 June 2024)	The VVB confirms that the plots in rows 136-142 have been removed in the CoastalEdge_InventoryCalcs_20240325 file. This finding can be closed.

Item Number	51
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.2
ACR IFM Methodology January 2022, v2.0 (Description)	Whether plots are permanent or temporary;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs.docx
Aster Global Round 1 Findings (15 January 2024)	The inventory SOPs do not appear to explicitly state whether plots are permanent or temporary.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding
Round 2 Response from Project Proponent (28 March 2024)	The SOP has been updated to explicitly state that permanent plots are used (Section 1.1).

Aster Global Round 2 Findings (25 June 2024)	The SOP has been updated to explicitly state permanent plots are used. This finding is closed

Item Number	52
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.2
ACR IFM Methodology January 2022, v2.0 (Description)	Detailed measurement procedures such that measurements are repeatable;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs.docx
Aster Global Round 1 Findings (15 January 2024)	During the site visit, the VVB had made different calls on the decay class of snags. This was in part due to lack of detail in Section 1.8 of the SOPs on how to select a class in a repeatable manner. E.g. if a tree is freshly dead but has a broken top, it is unclear if one should select class 1 or 2.
Round 1 NCR/CL/OFI	CL: Please determine if sufficient elaboration is warranted
Round 2 Response from Project Proponent (28 March 2024)	Cruisers were instructed to select the decay class that was the best fit for each tree, using their own professional judgement. This approach was consistent within our cruising team, but the development team did note that it was occasionally difficult to repeat by the auditor. Despite the discrepancies, the inventory was successful in that it passed the t-test. The SOP has been updated to state that the cruiser should "Work from the top down; i.e. a tree that does not meet all of the conditions in class 1 must be at least a class 2.". We expect that this clarification will improve replicability at future measurement events.
Aster Global Round 2 Findings (25 June 2024)	The VVB is sufficiently assured that the revision made in the Inventory SOPs will result in greater consistency and repeatability across cruisers, check cruisers and site visit plot audits.

Item Number	53
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.2
ACR IFM Methodology January 2022, v2.0 (Description)	Biomass estimation technique (section 4.2.2.1);

Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs.docx
Aster Global Round 1 Findings (15 January 2024)	It is unclear whether this requirement is included in the SOP document.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding
Round 2 Response from Project Proponent (28 March 2024)	The biomass estimation technique (Option 1 from IFM Methodology Section 4.2.2.1) has been added to Section 1.1 of the SOP document.
Aster Global Round 2 Findings (25 June 2024)	Appendix I Carbon Inventory SOPs has been updated to address Aster's finding. "The measurement instructions contained in this SOP are designed to facilitate biomass estimation using Option 1 (Jenkins method) outlined in the ACR's IFM Methodology v2.0 Section 4.2.2.1." This finding is closed.

Item Number	54
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.2
ACR IFM Methodology January 2022, v2.0 (Description)	Procedures for updating the inventory, including following harvests or disturbances.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs.docx
Aster Global Round 1 Findings (15 January 2024)	It is unclear whether this requirement is included in the SOP document. Additionally, it is unclear to the VVB how the project intends to monitor for natural disturbances.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the findings and update the project documentation as necessary.

Round 2 Response from Project Proponent (28 March 2024)	A section titled 'Procedures for updating the forest inventory' has been added as Section 2.4 of the inventory SOP document.
Aster Global Round 2 Findings (25 June 2024)	Procedures for updating the inventory, including following harvests or disturbances have been added to the Appendix I Carbon Inventory SOPs document provided, found in section 2.4. The updated Carbon Inventory SOPs state "Harvests and disturbances will be reported by on-the-ground forest managers, and changes to average carbon stocks will be detected via the 5-year forest inventory." The VVB notes that this language could lead to a scenario where there is harvest during a reporting period but the Project would not be required to update the forest inventory using on the ground measurements, it is unclear to the VVB how the Project intends to update forest carbon stock estimates following a harvest for interim years between the 5-year forest inventory. The VVB notes that the parameter Cp,tree,t in the GHG Plan for Monitoring Frequency states "Every 5 years or less, or at request for ERT issuance."
Round 2 NCR/CL/OFI	CL: Please clarify how the Project intends to update forest carbon stock estimates following a harvest or natural disturbance in interim years between the 5-year forest inventory.
Round 2 Response from Project Proponent (05 August 2024)	As stated in Section 2.4 of the Carbon Inventory SOPs, "Timber harvests and natural disturbances affecting more than 3% of the project area will be documented one or a combination of the following; aerial imagery, photographs, inventory data, or other means." On the ground measurements are not explicitly required by the methodology to quantify the carbon impacts of harvesting. This quantification might be achieved by adjusting average stocks for affected strata based on the silvicultural prescription and acres affected, by converting harvested volumes in trucking/mill slips to estimates of whole-tree carbon, or by other means as appropriate. The language in the SOP document leaves the specific mechanism for quantification open to what is most appropriate given the available data on a specific silvicultural operation. We have updated the SOP document Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs_20240717.docx to clarify that average stocking per strata will be adjusted based on past harvesting and disturbances, and that carbon stock changes due to harvest or natural disturbance will be reported every 5 years or less, or at request for ERT issuance.

Aster Global Round 3 Findings (16 August 2024)	The VVB has reviewed the Inventory SOPs and has additional requests for clarity. With regards to "iii. Timber harvests and natural disturbances affecting more than 3% of the project area will be reported by on-the-ground forest managers and documented via one or a combination of the following; aerial imagery, photographs, inventory data, mill/trucking receipts, or other means as necessary and appropriate. ". 1) This statement does not account for tending (i.e., precommercial thinning) or other non-intentional harvests (i.e., timber trespass). 2) It is unclear what the boundary of 3% is. Is this 3% over a specific duration (e.g. reporting period, year, or over the crediting period?). Is 3% an aggregate over a specific duration or per discrete harvest or disturbance? 3) It is unclear if there is a severity threshold. The VVB noted during the site visit that wind is likely a predominant form of disturbance. The impacts of wind can range from significant blowdown to snapped tops.
Round 3 NCR/CL/OFI	CL: Please clarify in line with finding and update the Inventory SOP as warranted for clarity.
Round 3 Response from Project Proponent (27 August 2024)	1. We have clarified this statement in Section 2.4 of the SOPs. Please see the updated version Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs_20240816.docx. 2. We have clarified this statement in Section 2.4 of the SOPs. Please see the updated version *Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs_20240816.docx*. 3. Only disturbances that are severe enough to be detected will be reported. Lower-severity disturbances will be captured in the normal course of the forest inventory which will be updated every 10 years, at minimum.
Aster Global Round 4 Findings 27 September 2024	The VVB reviewed the updated Inventory SOPs and notes that in Section 2.4 item (i) suggests the inventory will be updated every 10 years, however item (vi) references a 5-year forest inventory. It is unclear which timeline is appropriate.
Round 4 NCR/CL/OFI	CL: Please clarify in line with the finding and update the inventory SOP for clarity.
Round 4 Response from Project Proponent (30 September 2024)	Thank you for this correction. While TCT generally remeasures at least a subset of the inventory plots at five year intervals, the maximum length of time between measurement events is 10 years as indicated in item (i). We have removed the phrase 'five-year' from item (vi) to avoid confusion.
Aster Global Final Findings 30 September 2024	The VVB confirms that the SOP has been updated for clarity. This finding is closed.

Item Number	55
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.2
ACR IFM Methodology January 2022, v2.0 (Description)	Biomass for each tree is calculated using one of three estimation techniques (section 4.2.2.1). The Project Proponent must use the same set of equations, diameter at breast height thresholds, and selected biomass components for ex ante and ex post baseline and with-project estimates.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_bsl_live_20231004.xlsx Coastal Edge_wp_livetreeproj_20231004.xlsx GHG Plan
Aster Global Round 1 Findings (15 January 2024)	The Project uses Option 1. The calculation workbooks Coastal Edge_bsl_live_20231004.xlsx and Coastal Edge_wp_livetreeproj_20231004.xlsx include the carbon stock for trees less than 1" DBH. This is incongruent with the Jenkins method and Tables B2 and C1 of the GHG Plan; all tables in the GHG Plan which report live tree carbon stocks are affected.
Round 1 NCR/CL/OFI	NCR: Please ensure trees under 1" DBH are omitted from carbon stock calculations
Round 2 Response from Project Proponent (28 March 2024)	The trees under 1' DBH are omitted from the carbon stock calculation workbook "CoastalEdge_bsl_live.xlsx" in line with the findings.
Aster Global Round 2 Findings (25 June 2024)	The VVB did not find carbon stock attributed to trees under 1" DBH in the CE Grow_Treelist tab of CoastalEdge_bsl_live_20240325. However, the VVB found carbon stock attributed to trees under 1" DBH in other tabs (e.g. CE BSL1_CCYr2_Treelist)
Round 2 NCR/CL/OFI	NCR: Please ensure trees under 1" DBH are omitted from carbon stock calculations
Round 2 Response from Project Proponent (05 August 2024)	The trees under 1" DBH are omitted from all the tabs in the carbon stock calculation workbook "CoastalEdge_bsl_live_20240627.xlsx" in line with the findings.
Aster Global Round 3 Findings (16 August 2024)	The VVB finds that the Proponent has comprehensively ensured that stocks for trees under 1" DBH are not quantified. Closed

Item Number	56

ACR IFM Methodology January 2022, v2.0 (Section)	4.2.2.1
ACR IFM Methodology January 2022, v2.0 (Description)	Option 1 Generalized allometric regression equations for estimating biomass from 10 species groups (Jenkins et al. 2003; Table 4). Appendix A assigns species to species groups. Biomass of above and belowground components must be estimated according to their component ratios (table 6);
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Calc workbooks
Aster Global Round 1 Findings (15 January 2024)	Jenkins is used appropriately in the with project and baseline quantification workbooks. However, the VVB notes that in the Trees tab of the Inventory Calcs workbook, the tree count is only applied to above ground biomass and it is unclear why it is not also accounted for in belowground biomass calculations.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 2 Response from Project Proponent (28 March 2024)	Thank you for the opportunity to provide clarity. In our inventory calculation workbook, we estimated belowground biomass as the product of aboveground biomass * the Jenkins root ratios. Because tree count has been incorporated into the calculation of aboveground biomass, tree count also contributes to the calculation of belowground biomass.
Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification. The VVB reviewed the CoastalEdge_bsl_live_20240325.xlsx and noted the following: 1. In the CE Grow_Treelist tab the VVB noted that the formula in column AC appears to be attributing 0 carbon to trees with a TreeVal=9; however, the treevalue column does not contain any values of "9" and it is unclear to the VVB what the purpose of this If statement is. 1a. The VVB also noted that the quantification of dead ABGB is not correct as it does not appear to consider density reduction factors nor Structural loss factors. 2. The FVS Output database for the 3 considered baseline prescriptions appears to have data for 2052, but this is not included the Project's workup, it is unclear to the VVB why this occurs. 3. In the 4 tabs referenced in Findings 1 and 2, the VVB notes that there is no unique identifier or each tree in the these four tabs and therefore tracing trees from FVS through the quantification workbooks is not possible. The VVB is requesting that a unique identifier be added to allow the VVB to trace trees throughout the entire quantification process.

Round 2 NCR/CL/OFI	CL: Please clarify in line with findings and update the quantification and project documents as necessary.
Round 2 Response from Project Proponent (05 August 2024)	1. The 'CE Grow_Treelist' tab of Coastal Edge BSL live workbook (CoastalEdge_bsl_live_20240627.xlsx) has been updated by removing the IF statement attributing to TreeVal=9 in the Column AC. 1a. The AGBG quantification of the CE Grow_Treelist tab of the BSL live workbook (CoastalEdge_bsl_SnagDet_20240627.xlsx) is not the input for the ACR calculation workbook. Hence, we deleted the AGBG column for clarity and to avoid any confusion from the workbook. 2. The 2052 output has not been used for any of the ACR calculation analysis/workbook. Hence, we omit the 2052 output in the BSL treelist. The updated FVS backup file and the output treelist data has now aligned. 3. We have added the "ActPt" column to all FVS treelist and cutlist outputs, and included this column in all the excel workbooks for the baseline and with project scenario as discussed during the calculation walkthrough call. This column will facilitate the VVB creating a unique identifier.
Aster Global Round 3 Findings (16 August 2024)	The VVB is able to recreate CoastalEdge_bsl_live_20240325 except for the calculation of RMA and no RMA (let grow) LOW in the Pivot LiveTrees BSL tab. Because this is not specifically germane to tree-level calculations, that finding has been opened elsewhere. As, the VVB is able to recreate every tree-level calculation using Option 1, this finding is now Closed.

Item Number	57
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.3.1 STANDING DEAD WOOD (IF INCLUDED)
ACR IFM Methodology January 2022, v2.0 (Description)	Step 1 Standing dead tree biomass shall be measured and estimated using the same criteria, monitoring frequency, and technique used for measuring and estimating biomass of live trees. The decomposed portion that corresponds to the original biomass is discounted in Step 2.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_bsl_sngproj_20231004.xlsx

Aster Global Round 1 Findings (15 January 2024)	Standing dead wood is included in the project. However, the VVB was unable to verify the tree list in the "Coastal Edge_bsl_sngproj_20231004.xlsx" workbook, tab "FVS_treelist_Grow100_BAI_SD". It is unclear what the source of that tree list is. The VVB noted that when the pivot tables in TreeAvg_mtCO2 were refreshed, the average ABGB tCO2 changed. The 'average' in the TreeAvg_mtCO2 workbook assumes all snags occurred represent the same TPA which is not the case.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding and update calculation workbooks and reporting documentation as necessary.
Round 2 Response from Project Proponent (28 March 2024)	We have updated our approach by utilizing the Snag Detection outputs from FVS for each baseline harvest year. Please see '*FVS SnagDet_CoastalEdge.xlsx'.*
Aster Global Round 2 Findings (25 June 2024)	Due to revisions of project docs, the original finding is nullified. The VVB has reviewed 'FVS SnagDet_CoastalEdge.xlsx' with reference to a different, more applicable, requirement. Pending below requirement regarding belowground biomass is satisfied
Round 2 NCR/CL/OFI	
Round 2 Response from Project Proponent (05 August 2024)	
Aster Global Round 3 Findings (16 August 2024)	Following closure of tree-level quantification findings, this finding is deemed to have been met

Item Number	58
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.3.1
ACR IFM Methodology January 2022, v2.0 (Description)	Standing dead tree biomass must be adjusted for density reductions and structural loss. Decay classes must be collected during field measurements according to the classification system of the USDA FIA program .
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	CoastalEdge_InventoryCalcs_20230904.xlsx Coastal Edge_bsl_sngproj_20231004.xlsx

Aster Global Round 1 Findings (15 January 2024)	In CoastalEdge_InventoryCalcs_20230904.xlsx, the project correctly accounts for density reduction and structural loss in standing dead wood. In bsl_snagproj, the density reduction factor and structural loss adjustment are not employed.
Round 1 NCR/CL/OFI	NCR: Please correct in line with requirement
Round 2 Response from Project Proponent (28 March 2024)	FVS outputs do not provide an estimate of density reduction and structural loss to use for standing dead wood. In our updated Standing Dead analysis ('FVS SnagDet_CoastalEdge.xlsx'.). We apply the average observed missing biomass and decay class from the 2023 inventory to the FVS outputs. Please see the 'Standing Dead Lookup' tab for details.
Aster Global Round 2 Findings (25 June 2024)	The VVB was unable to recreate the belowground biomass (BGB (kg)) in CoastalEdge_bsl_SnagDet_20240325. Please revise the Excel formulae to mirror that of Eq 2 in Jenkins et al. It is unclear why the Project discounts the belowground biomass using the average percent missing biomass of aboveground standing dead of the inventory.
Round 2 NCR/CL/OFI	NCR: Please correct and revise (BGB (kg) quantification CL: Please clarify in line with finding
Round 2 Response from Project Proponent (05 August 2024)	Thank you for this correction. The BGB (kg) calculation in CoastalEdge_bsl_SnagDet_*.xlsx has been revised in line with the findings. The belowground biomass quantification has been updated so that it no longer discounts the percent missing biomass of aboveground standing dead of the inventory (please see the revised column "BGB (kg)" in the workbook for Grow and all three BSL scenario). The missing AGB is accounted for in the "AGB+BGB (kg)" column of the given tab. The Baseline Live, Baseline Snag, With-Project Live, Inventory Calcs, and Inventory Calcs—PCT workbooks were all checked for consistency with this approach.
Aster Global Round 3 Findings (16 August 2024)	The VVB is able to recreate CoastalEdge_bsl_live_20240325 except for the calculation of RMA and no RMA (let grow) LOW in the Pivot LiveTrees BSL tab. Because this is not specifically germane to tree-level calculations, that finding has been opened elsewhere. As, the VVB is able to recreate every tree-level calculation using Option 1, this finding is now Closed.

Item Number	59
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.4
ACR IFM Methodology January 2022, v2.0 (Description)	I. 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.

Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	CoastalEdge_bsl_hwpproj_20231004.xlsx
Aster Global Round 1 Findings (15 January 2024)	It is unclear to the VVB why the FVS BdFt output is used to quantify the amount of wood harvested delivered to mills rather than MCuFt. Further, on the "FVS_treelist_CC_Ref_Thin" tab, it appears that the tCO2 calculations didn't get carried through the entire tree list. Rows 12224-12243 do not have quantified tCO2/ac values. In addition, the VVB notes that the GROW tree list is used in the quantification described in steps 1-5 below, however it appears that the volume of the leave trees required on each clearcut acre have not been accounted for in the HWP calcs. It is unclear why the GROW list is used in quantifying HWP carbon values. Third, it is unclear why the merchantable volume in dead trees is assumed to not be delivered to a mill.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding and update calculation workbooks as necessary.
Round 2 Response from Project Proponent (28 March 2024)	1a. FVS MCuFt output has been used to quantify the amount of wood harvested and delivered to mills in line with the findings. 1b. Thanks for finding this error. FVS_treelist for baseline is carried through the entire tree list with tCO2e/ac value. 2. In line with the findings, the correct FVS CutList has been utilized to quantify the harvested wood products (HWP), as described in steps 1-5. Consequently, this accounts for the volume of residual trees that need to be left out during clearcutting. 3. Apologies for any confusion. Previously, we mistakenly used the FVS TreeList output to calculate the HWP. In revising the workbook, we have now utilized the correct FVS CutList output to calculate the volume of trees delivered to the mill, including dead trees.

Aster Global Round 2 Findings (25 June 2024)	1a. The VVB confirmed that MCuFt output is now used to compute volume of wood harvested. This finding is closed. 3. The project response states that the FVS CutList output is now used to calculate volume of trees delivered to the mill, including the dead trees. However, the VVB notes that the CutLists used in the HWP workbook do not appear to include any dead trees. It remains unclear why the merchantable volume in dead trees is assumed to not be delivered to a mill. 4. The VVB noted that the link in footnote 27 appears to be incorrect. 5. Additionally, the VVB notes that the Project's calculation of Average mTCO2e/ac for each strata in the PIVOT HWP tab appears to be incorrect. Specifically, the baseline harvest prescriptions are not spatially explicit and harvest across all plots in the strata. However, the weighted average is only calculated on acres that are harvested rather than all acres in the strata.
Round 2 NCR/CL/OFI	CL: Please clarify in line with the findings and update calculation workbooks and reporting documentation as necessary.
Round 2 Response from Project Proponent (05 August 2024)	2. It is not common practice for dead wood to be delivered to the mill. See email with ODF Stewardship Forester 'The Climate Trust Mail - ODF follow up.pdf' 3. The footnote 27 link in the GHG plan has been updated as (https://apps.fs.usda.gov/r6_decaid/views/snag_dynamics.html) in line with the finding. 4. We have updated the HWP workbook in line with the finding (see the updated workbook, CoastalEdge_bsl_hwpproj_20240628.xlsx).
Aster Global Round 3 Findings (16 August 2024)	With regard to item 2, the VVB has reviewed The Climate Trust Mail - ODF follow up.pdf and, based on statements made by ODF foresters, is reasonably assured harvesting of standing dead is not common practice. The VVB reviewed the updated GHG Plan and confirmed this update has been made, this finding is closed. 4. Thank you for the correction. The VVB notes that the Project's HWD PULP tCO2/ac table in year 2032 incorrectly references the hardwood saw pivot table values. It is unclear why hardwood pulp is not referenced in year 2032.
Round 3 NCR/CL/OFI	CL: Please clarify in line with the finding and update calculation workbooks and reporting documents as necessary.
Round 3 Response from Project Proponent (27 August 2024)	The Project's HWD Pulp tCO2e/ac table in the year 2032 has been updated to reference the HWD pulp values in line with the finding. This slightly changed the total HWP for the year 2032, which has been reflected in the CoastalEdge_bsl_hwpproj_20240816.xlsx spreadsheet and the subsequent ACR calc workbooks.
Aster Global Round 4 Findings 27 September 2024	The VVB reviewed the updated baseline HWP workbook and confirms that the error has been corrected. This finding is closed.

Item Number	60

ACR IFM Methodology January 2022, v2.0 (Section)	4.2.4
ACR IFM Methodology January 2022, v2.0 (Description)	V. Divide the carbon weight by 2,204.6 pounds/metric ton and multiply by 3.664 to convert to metric tons of CO2. Sum the CO2 for each species into saw log and pulp volumes (if applicable), and then again into softwood species and hardwood species. These values are used in the next step (accounting for mill efficiencies). Please note that the categorization criteria (upper and lower DBH limits) for hardwood/softwood saw log and pulp volumes must be the same between the baseline and with-project scenarios.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	CoastalEdge_bsl_hwpproj_20231004.xlsx
Aster Global Round 1 Findings (15 January 2024)	It is unclear to the VVB why Species Code 999 is considered a Softwood in the HWP workbook, while it appears to be considered a Hardwood in the standing stock with-project and baseline workbooks, and FVS modeling.
Round 1 NCR/CL/OFI	CL: Please clarify the apparent discrepancy and update calculation workbooks as necessary to ensure consistent reporting.
Round 2 Response from Project Proponent (28 March 2024)	Species code 999 in the HWP calc workbook is changed to a Hardwood in line with the standing stock with-project and baseline workbook. The slight change in HWP output is updated in the workbook.
Aster Global Round 2 Findings (25 June 2024)	1. The VVB reviewed the CoastalEdge_bsl_hwpproj_20240325.xlsx and noted that there no longer appears to be a tree with a species code 999, it is unclear why this may have changed. 2. The VVB noted that there is a tab labeled CutList_CCYr22 with only a single tree in that tab. This prescription does not appear to be described in the GHG Plan nor have supporting FVS files been provided for this. 3. The GHG Plan appears to show that the LOW stratum receives a pre-commercial thin in 2025; however, the run title associated with this prescription is titled as Coastal Edge BSL_CCYr2 it is unclear to the VVB why this occurs and if the correct prescription has been applied.
Round 2 NCR/CL/OFI	CL: 1. Please clarify in line with the finding and clearly describe why that tree species no longer appears in the BSL quantification. CL: 2-3. Please clarify in line with the finding and update the Project quantification and Project documentation as necessary.

Round 2 Response from Project Proponent (05 August 2024)	1. The HWP workbook previously used the FVS Treelist (which has the species code 999) output, but this data source has been changed to FVS Cutlist output. No species code 999 has been found in the Cutlist record. (see the Species tab in CoastalEdge_bsl_hwpproj_20240628.xlsx). 2. The CutList_CCYr22 tab has been deleted in the updated HWP workbook (CoastalEdge_bsl_hwpproj_20240628.xlsx). Thanks for the opportunity to clean the workbook. 3. Yes, the LOW stratum receives only the pre-commercial thin, while the MED and HIGH strata receive the clearcut prescription in Yr 2 as well as other prescriptions as described in the GHG plan. The runtitle is just a name to track the several baseline prescriptions in the project. The FVS backup file should reflect that each stratum received the correct prescription as shown in Table E7 of the GHG plan. Here is the summary: - FVS runtitle "Coastal Edge BSL_CCYr2" includes Clearcut in High and Medium strata in Yr2 (2022), Reforestation in Yr 3 (2023), and pre-commercial thinning in Yr 15 (2035). This also includes pre-commercial thinning in the Low stratum in Yr 5 (2025). - FVS runtitle "Coastal Edge BSL_CCYr7" includes CC (in 2027), Reforestation (in 2028), and PCT (in 2040) in the High and Medium strata. - FVS runtitle "Coastal Edge BSL_CCYr12" includes CC (in 2032), Reforestation (in 2033), and PCT (in 2045) in the High and Medium strata.
Aster Global Round 3 Findings (16 August 2024)	1. Thank you for this clarification. 2. The cleansing of an erroneous Excel tab is noted. 3. The VVB appreciates the clarification.

Item Number	61
ACR IFM Methodology January 2022, v2.0 (Section)	5.1
ACR IFM Methodology January 2022, v2.0 (Description)	SOP's and QA/QC procedures for forest inventory, including field data collection and data management, are applied and described in an inventory SOP document (section 4.2.2).
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	CoastalEdge_InventoryCalcs_20230904.xlsx

Aster Global Round 1 Findings (15 January 2024)	The VVB requests a 5% sample of plot cards (field records) to verify tree data entry in the "CoastalEdge_InventoryCalcs_20230904.xlsx" workbook. Please provide plot cards for 7 randomly selected plots: 238, 241, 230, 313, 331, 204, 305. The VVB notes that the Inventory SOPs require percent defect be recorded in 10% increments, however there are several trees with a 99% defect recorded for the middle or top third in the Tree List. It is unclear why this occurs.
Round 1 NCR/CL/OFI	CL: Please provide the requested evidence. CL: Please clarify in line with the finding and update calculation workbooks and reporting documentation as necessary.
Round 2 Response from Project Proponent (28 March 2024)	The cruiser used the digital recorder. Raw data outputs from their recorder are attached as 'DC Requested Raw data.xlsx' in the folder 'R1 - Supplementary materials'. We have changed the decay class from 99% to 100% on these trees in the inventory calc sheet in line with the findings. This occured because the cruiser used 99% instead of 100% to avoid the cofusion during data entry. Downstream calculations and reporting documentation have been updated.
Aster Global Round 2 Findings (25 June 2024)	1. Thank you for providing the requested sample. The VVB notes that tree 6 on plot 230 has a recorded DBH of 11.6 in the DC Requested Raw data.xlsx, and is recorded with an 11.5 DBH in the CoastalEdge_InventoryCalcs_20240325.xlxs workbook. It is unclear why this discrepancy occurs. Further, it is unclear to the VVB what the extent of such errors is. 2. The VVB understands that these data were entered with a digital recorder and therefore it is unclear how the above noted transcription errors occurred. The VVB is requesting clarification to allow the VVB to better understand how the transcription errors occurred. Missing biomass has been recorded to the nearest 10%in the updated Inventory Calcs workbook. Thank you for the clarification, this finding is closed.
Round 2 NCR/CL/OFI	CL: Please clarify in line with the finding and update calculation workbooks as necessary.

Round 2 Response from Project Proponent (05 August 2024)	1. The 0.1" difference in DBH between the raw datalogger output (DC Requested Raw data.xlsx) for Plot 230 - Tree 6 is not an error. A note was provided on this tree record "fused/dbh estimate based on above at 5.3". The cruiser assigned an 11.5" DBH to this tree in the final data delivery as a more appropriate measurement of DBH during his own QA/QC process, in line with standard procedures. TCT uses the final, fully checked version of data delivered by our inventory contractors in the carbon calculations. 2. Consistent with our response in #1 above, the reason for updating the DBH value was noted by the cruiser in his communication with the project developer, and this difference is not an error. The VVB requested raw datasheets which are by definition unfinished products. Through the cruiser's internal QA/QC he determined that the appropriate DBH measurement is 11.5".
Aster Global Round 3 Findings (16 August 2024)	Thank you for this clarification. The VVB finds that this error correction does not conflict with inventory methods outlines in Appendix I. As the VVB audited plots against the final QA/QC'd version of the inventory, the VVB is reasonable assured that that the final inventory reflects actual standing carbon stocks.

Item Number	62
ACR IFM Methodology January 2022, v2.0 (Section)	5.2 MONITORING OF CARBON STOCKS IN SELECTED POOLS
ACR IFM Methodology January 2022, v2.0 (Description)	The inventory SOP document must describe how the project will update the forest inventory data following harvests or disturbances.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Inventory SOPs
Aster Global Round 1 Findings (15 January 2024)	It is unclear to the VVB how the project will update the forest inventory data following harvests or disturbances. This appears to be excluded from the Inventory SOP document.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 2 Response from Project Proponent (28 March 2024)	A section titled 'Procedures for updating the forest inventory' has been added as Section 2.4 of the inventory SOP document.

Aster Global Round 2 Findings (25 June 2024)	"Procedures for updating the forest inventory" has been added as Section 2.4 in the Inventory SOP document provided. This finding can be closed.

Item Number	63
ACR IFM Methodology January 2022, v2.0 (Section)	5.2
ACR IFM Methodology January 2022, v2.0 (Description)	Tree species;
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Section D1 GHG Plan, Section V MR
Aster Global Round 1 Findings (15 January 2024)	It is unclear why the parameter is not included in Section D1 of the GHG Plan or Section V of the MR.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding and update reporting documentation as necessary
Round 2 Response from Project Proponent (28 March 2024)	Parameter "Tree species" has been added to the GHG plan of section D1 in line with the findings.
Aster Global Round 2 Findings (25 June 2024)	A parameter monitored table "Tree species" has been added to the GHG plan Section D1 and the Monitoring Report.

Item Number	64
ACR IFM Methodology January 2022, v2.0 (Section)	5.3
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 13
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	ERT Calc workbook RainforestReserve_InventoryCalcs_PCT 2023.xlsx
Aster Global Round 1 Findings (15 January 2024)	The VVB reviewed the "Coastal Edge_ACR calcs_RP 1_20231004.xlsx" workbook and notes the following related to the adjustment of with-project stocks in the reporting period due to the pre-commercial thin as it was computed in the inventory workbook "RainforestReserve_InventoryCalcs_PCT 2023.xlsx": 1. There doesn't appear to be a slope adjustment for the PCT plots 1-6. 2. The VVB was not provided an inventory SOP document pertaining to the inventory summarized in the "RainforestReserve_InventoryCalcs_PCT 2023.xlsx" workbook. 3. The tree list used to compute total carbon removed in the PCT does not appear to be grown to the date of cutting, thus the carbon removed is underestimated. 4. The contract for the PCT specifies preferred species and sizes to leave. It is unclear how the calculation of removed carbon accounts for these specifications. 5. No evidence of the timing of the PCT has been provided to the VVB. 6. Please provide field plot cards for plot PCT-2 for data entry verification purposes.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding. NCR2: Please provide documentation describing the inventory procedure utilized in the "RainforestReserve_InventoryCalcs_PCT 2023.xlsx", including a description of inventory design and plot allocation. NCR3: Please update calculation workbooks and reporting documents to address the identified issue. CL4: Please clarify in line with the finding. CL5: Please clarify in line with the finding and provide verifiable evidence that the PCT occurred as described. CL6: Please provide the requested plot card.

Round 2 Response from Project Proponent (28 March 2024)	1. The cruiser did not collect slope for the PCT plots. As an approximate substitute, we have extracted slope at the plot locations from the slope (%) raster calculated from a DEM. An updated plot locations layer is also provided which includes these slope values (*NCLC_2023thin_Plots_ExtractSlope.zip'*. Please note that we originally sent the wrong version of the PCT plot layer. The layer attached here was used for the PCT cruise as evidenced by matching coordinates. 2. The cruiser used the same inventory SOP as was used in the project-wide inventory. The only change is that plot-level measurements of slope and aspect were not recorded. 3. The PCT cruise was completed on June 14-15, 2023, just 4 weeks prior to the PCT treatment in July 2023. These plots are not expected to have accrued meaningful biomass between the dates of measurement and the PCT treatment on the north unit. We have removed the 2 inventory plots that were measured in February & March 2023 (1 each per PCT unit) to keep accounting assumptions consistent. Please see the updated spreadsheet RainforestReserve_InventoryCalcs_PCT 2023_20240207 4. The calculation has been updated to account for greater nuance in the PCT treatment. The PCT was simulated by adding a 'PCT_retained' column to the Tree tab of the PCT inventory calcs work book. Trees were selected for retention in the PCT treatment based on the species-specific instructions in the contract, and then based on size (the largest were retained). The number of trees retained was manipulated until each unit had 220-280 TPA retained on average. 5. The PCT treatment was completed in between July 17-31, 2023. See the attached email 'The Climate Trust Mail - PCT dates.pdf' 6. Plot data was shared with TCT electronically. The raw data sheet is attached as '*NCLC Thinning plots.xlsx'*

Aster Global Round 2 Findings (25 June 2024)	1. The VVB reviewed the shapefile and confirmed was able to confirm that the DEM values were correctly identified in the shapefile and within the workbook. This finding is closed. 2. Thank you for the clarification, this finding is closed. 3. Thank you for the clarification. The VVB reviewed the "RainforestReserve_InventoryCalcs_PCT 2023_20240321.xlsx" workbook and it is unclear where the hardcoded pre-treatment and post-treatment table TPA sums are sourced from in column N and column U. 4. This finding is pending Finding 3. 5. Thank you for the clarification, this finding is closed. 6. Thank you for the clarification, the VVB has not been provided the raw plot cards as the plot data was recorded electronically, this finding is closed. 7. The VVB noted that the number of days between the period 10/26/2022 and 8/1/2023 is calculated differently between the bsl proj and wp proj tabs in the Coastal Edge_ACRcalcs_RP 1_20240326.xlsx workbook.
Round 2 NCR/CL/OFI	CL: Please clarify in line with finding 3 and update calculation workbooks and reporting documentation as necessary. NCR: Please update the quantification to ensure that the number of days used for interpolation between the baseline and project scenarios is applied consistently.
Round 2 Response from Project Proponent (05 August 2024)	3. Apologies, these columns were not updated when we adjusted the calculation workbook in Round 1. The values in columns N and U of the 'Summary' tab now reflect pre- and post-treatment TPA as shown in the pivot table (columns A-D; toggle PCT_retained = 'Y' for post-treatment stocking). This change did not affect the quantified carbon impact of thinning in RP 1 ('Summary' cell R17). The workbook '*RainforestReserve_InventoryCalcs_PCT 2023_*.xslx*' has been updated accordingly. 4. Pending VVB response to #3 above. 7. Thank you for catching this error. The number of days used for interpolation in the 'wp proj' tab has been updated to match the 'bsl proj' tab. The correct equation is (end_date - start_date + 1); this gives the total number of days covered by a given date range. The workbook '*Coastal Edge_ACR calcs_RP 1_*.xlxs*' has been updated accordingly.

Aster Global Round 3 Findings (16 August 2024)	3. Thank you for the clarification, the VVB reviewed the updated PCT workbook and confirmed the updated the 4. The VVB is reasonably assured that the Project's method for accounting for the PCT harvest is an appropriate approximation. This finding is closed. 7. The VVB reviewed the updated RP1 calculation workbook and confirmed that the error noted by the VVB has been corrected. This finding is closed.

Item Number	65
ACR IFM Methodology January 2022, v2.0 (Section)	5.4
ACR IFM Methodology January 2022, v2.0 (Description)	If the project decreases wood product production by >5% relative to the baseline then the Project Proponent and all associated landowners must demonstrate that there is no leakage within their operations – i.e., on other lands they manage/operate outside the boundaries of the carbon project. This demonstration is not required if the Project Proponent and associated landowner(s) enroll all their forested landholdings, owned and under management control, within the carbon project.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section E4, Email_Monitoring Update - RP 1.pdf, Forestrycontract _ 2023__NCNC_DDFORESTRY, Geospatial files, Disturbance Analysis

Aster Global Round 1 Findings (15 January 2024)	1. The VVB reviewed the referenced documents and notes that the Project Proponent has "conducted some non-commercial thinning on a separate property." The VVB reviewed the Forestrycontract _ 2023__NCNC_DDFORESTRY.pdf which states "Customer to provide payment on 30-day terms based on completed units meeting the requirements of the project description. Payment shall be $188 / and contract total not to exceed $14,664. Partial units to be approved and invoiced in the following 1-month period. Contractor to invoice at the end of each month." It is unclear to the VVB what the monetary terms of this contract are, specifically, it is unclear what "Payment shall be $188 / " means. 2. The VVB was unable to find a signed and finalized contract. 3. The VVB is requesting additional evidence related to this non-commercial thinning to confirm that the harvest was a "a non-commercial thinning." 4. The VVB noted disturbance that is potentially a harvest in SW portion of the property in the vicinity of the point with coordinates (45.795376, -123.955152) which appears to have occurred within the monitoring period.
Round 1 NCR/CL/OFI	CL: Please clarify in line with finding 1. CL: Please provide a signed and finalized version of the contract. CL: Please provide a copy of the non-commercial thinning contract, spatial files showing the extent of the commercial thinning, and estimates of volume delivered to mills. CL: Please clarify the nature of the disturbance noted in Finding 4, update reporting documentation, and quantification documents as needed.
Round 2 Response from Project Proponent (28 March 2024)	1. The payment for this service is at a rate of $188/acre. 2. An updated contract with a digital signature from Jon Wickersham, Associate Director of North Coast Land Conservancy, is provided in the folder 'R1 - Supplementary materials'. NCLC did not receive a countersigned agreement from D&D Forestry. 3. A shapefile of the thinning operation was provided with the initial submission of materials in the folder 'NCLC_2023thin.zip'. Please note that only the north unit was thinned during the reporting period. No biomass was removed from the site, and no revenue was generated from this management activity. 4. This is a blowdown event that occured during the winter of 2020/2021, prior to the project start date.

Aster Global Round 2 Findings (25 June 2024)	1. Thank you for the clarification, this finding is closed. 2. Thank you for the clarification, the VVB reviewed the contract provided. This finding is closed. 3. Thank you for the clarification. The VVB reviewed the provided shapefile and is reasonably assured that the area depicted in the shapefile is accurate. This finding is closed. 4. The VVB confirmed using Sentinel 2 imagery hosted by Copernius that this blowdown occurred between Dec 2020 and March 2021, predating the project start date. Closed

Item Number	66
ACR IFM Methodology January 2022, v2.0 (Section)	5.4
ACR IFM Methodology January 2022, v2.0 (Description)	Verifiable evidence of no harvesting in a given reporting period for all lands owned or managed by participating entities (e.g., Project Proponent, landowner) and not enrolled in the carbon project.
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan Section E4, Email_Monitoring Update - RP 1.pdf
Aster Global Round 1 Findings (15 January 2024)	The project proponent provided an attestation from Colin Meston, Land Steward with NCLC confirming that no commercial harvesting occurred on any property owned by NCLC. The attestation states that non-commercial thinning did take place. However, the VVB is also requesting a geospatial file showing all the lands owned by the Project Proponent and evidence to support the statements made within the Email_Monitoring Update - RP 1.pdf that refer to "some non-commercial thinning on a separate property" that these harvests are not commercial harvests as defined by the methodology.
Round 1 NCR/CL/OFI	CL: Please provide a geospatial file showing all the lands owned by the Project Proponent
Round 2 Response from Project Proponent (28 March 2024)	A GIS file showing lands owned by NCLC is provided as NCLC_properties_0612023.zip. Please note that this file includes lands owned by NCLC as well as lands on which they hold a conservation easement. Non-commercial thinning occurred on NCLC's Boneyard tract. The contract for this work, which shows NCLC paying a contractor to perform thinning services, is provided as *2023BoneyardRRThinSigned.PDF*

Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification and providing the updated documents. The VVB conducted a remote sensing analysis to assess the accuracy of the Project's statement that there has been no commercial harvesting on NCLC Properties. The VVB also reviewed the contract related to the Boneyard track is reasonably assured that this was a pre-commercial thin and not a commercial harvest. In summary, the VVB is reasonably assured that there has been no activity shifting leakage during the reporting period on lands owned by the Project Proponent. This finding is closed.

Item Number	67
ACR IFM Methodology January 2022, v2.0 (Section)	6.1 EX-ANTE ESTIMATION METHODS
ACR IFM Methodology January 2022, v2.0 (Description)	The Project Proponent must make an ex ante calculation of GHG removals and emissions for all included sinks and sources for the entire crediting period. These projections must be included in the GHG Project Plan. Project Proponents shall provide estimates of the values of those parameters that are not available before the start of monitoring activities. Project Proponents must retain a conservative approach in making these estimates
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	appendix A GHG Plan
Aster Global Round 1 Findings (15 January 2024)	Section E9 in the GHG Plan states "Minimal harvests are planned over the next 20 years, so no harvests are modeled ex-ante.". It is unclear the harvests which are planned are not considered as this would be a conservative approach. Given that Appendix A states the IFM project will follow the activities and specifications detailed in the forest management plan, it is unclear why the ex ante scenario is not based on the forest management plan, taking into consideration relevant legal constraints such as the FPA and pre-existing conservation easement.
Round 1 NCR/CL/OFI	CL: Please clarify in line with finding
Round 2 Response from Project Proponent (28 March 2024)	Apologies for the vague language. No commercial harvesting is currently planned during the project term. The reference to the out-of-date forest management plan has been removed to avoid confusion.

Aster Global Round 2 Findings (25 June 2024)	In regards to the prior finding for this requirement, the Proponent has clarified that a let grow approach will be taken for the project activities. The VVB has issued an other finding regarding this planned activity elsewhere. This portion of the finding is pending resolution of that other finding. Additionally, The VVB found that several trees had a different % missing in the baseline FVS treeinit than was calculated in the inventory workbook. These are off between 0.5% and 1.2%. For example this is tree 24091 in FVS which had an Mdefect of 34% but a calculated 35% missing in the inventory, and tree 26203 which had an MDefect of 6% but a calculated 6.5% missing in the inventory. It is unclear why these are different. This is affecting the carbon stocks in CoastalEdge_wp_livetreeproj_20240325 Finally, CoastalEdge_wp_livetreeproj_20240325's strata and project area average CO2e/ac do not appear to be incorporating no-tally plots.
Round 2 NCR/CL/OFI	CL: Please clarify the missing material percentage CL: Ensure that the wp workbook (as well as standing dead and bsl workbooks) incorporate no-tally plots when averaging.
Round 2 Response from Project Proponent (05 August 2024)	1. Pending other finding. 2. Thanks for catching this error. These values changed when we corrected defect values which were entered as 99% to 100% in the inventory calcs workbook. It was our error to not copy these updated values to the FVS treeinit data. We have updated the FVS treeinit tab to align with the inventory workbook in line with the findings. The updated treeinit tab is in CoastalEdge_FVS_TreeInIt_Degrow20240628.xlsx spreadsheet. The re-run FVS output has been used to update for all the workbook. 3. The Coastal Edge project scenario workbook has included the no-tally plots by incorporating their plot numbers in the FVS_StandInit tab, even though there is no data for these plots in the FVS_TreeInit tab during the FVS run. For example, the Low strata has 10 plots listed in FVS_StandInit, but FVS_TreeInit shows no tree data for the no-tally plot (Plot 109 in the FVS_TreeInit tab of the CoastalEdge_FVS_TreeInit_Degrow20240628.xlsx workbook). The absence of the ActPt column in the FVS Treelist and Cutlist may have caused some confusion. In the updated workbook, all treelist and cutlist outputs from FVS now include the ActPt column.

Aster Global Round 3 Findings (16 August 2024)	1. The assessment of this requirement is no longer pending related findings with regards to accounting for harvests in the ex ante scenario. Closed. 2. The revision has been noted. It has been noted as an OFI that the calculations incorporating missing material are impacted by the rounding in FVS when MDefect is reported. Closed. 3. This clarification is helpful. The VVB can confirm that the entry of the number of plots within the StandInit table does account for no-tally plots. Closed

Item Number	68
ACR IFM Methodology January 2022, v2.0 (Section)	8 CALCULATION OF ERTS
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 24
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge GHG Plan_20231004, Coastal Edge_ACRcalcs_20231004.xlsx, Coastal Edge_RP 1_MR_20231004

Aster Global Round 1 Findings (15 January 2024)	The VVB reviewed the Coastal Edge_ACRcalcs_20231004.xlsx ERT workbook and noted the following: 1. In the "bsl proj" tab values are reported in column B which appear to be years; however, it is unclear to the VVB what specific dates these values represent. For example, the Live tco2e/acre value in 2022 is 256.8; however, the total HWP tco2 is equal to 45,782.9. Further the total HWP tco2 value in 2022 is applied in column F ("ACR Account Year" = 2). 2. The VVB found that the Live Tree stocking values for the project scenario are the same for the "Year" 2021 and 2022. The VVB understands that these may represent the live tree carbon stocks at 10/16/2021 for year 2021 and 01/01/2022 for year 2022; however, it is then unclear to the VVB what the live tree stocking values at the end of the crediting period are as the "Year" 2041 would appear to represent carbon stocks at 1/1/2041 rather than at 10/25/2041. 3. The Project appears to account for negative leakage emissions within their ERT reporting which does not appear to be correct based on the ERT Calculator provided on the ACR website. The VVB reviewed the Coastal Edge_ACR calcs_RP 1_20231004.xlsx ERT workbook and noted the following: 4. Row 19 of the ACR IFM calc template prorates the valued in cell G19 based on days within the RP; however, it is unclear to the VVB if this is in line with the methodology. 4a. Additionally, it is unclear to the VVB why the value in E19 would not be prorated if the since the value in cell G19 has been prorated. 5. Similar to the Finding 3 above, the ERT workbook for the monitoring period appears to include both negative leakage emissions and buffer emissions, which does not appear to be in line with the methodology. 6. The Project appears to split ERTs, ERs, Removals into vintages in the table in cells A50:F65; however, the ERT workup in Cells B11:H46 is already split into vintages. It is unclear to the VVB how it is appropriate to reallocate vintages over the reporting period. The VVB understands that the Equations in the IFM methodology are intended to be applied on a full year basis rather than applied at the at the vintage level. It is unclear to the VVB if the current ERT workup is in line with the methodology.
Round 1 NCR/CL/OFI	CL: Please clarify which specific dates the Year column within the bsl proj and wp proj tabs of the ERT workbook correspond to for all values (e.g. Live, Dead, and HWP) and if needed update the quantification workbooks and reporting documents. NCR: Please updated the project ERT quantification to ensure that no negative leakage emissions are not considered within the ERT workup. CL: Please clarify in line with Findings 4-6 and updated the quantification workbooks and reporting documents as necessary.

Round 2 Response from Project Proponent (28 March 2024)	Findings 1 & 2: We have adjusted the dates in the ACR calcs workbook so that the entire 20-year crediting period is captured in the calculations. For the avoidance of confusion, carbon stocking for each year references stocks at Oct. 26 of that year. 3: Thank you. The negative emissions value has been corrected in both ACR calcs sheets Findings 4 & 4a. Average HWPs should be prorated to the number of days in the RP (Methodology eqn 30). However, we have noted that originally this pro-rating was not applied correctly. Please see the updated RP1 ACR calcs. 5: Thank you. The negative emissions value has been corrected in both ACR calcs sheets 6: We may have interpreted Equation 27 in the Methodology differently; we calculated ERT vin,y according to Eqn 27 which uses RP cal,t (Total calendar days within reporting period t) as the denominator. We have updated the calculation as suggested in the finding.

Aster Global Round 2 Findings (25 June 2024)	1. Thank you for the clarification. The VVB reviewed the updated quantification workbooks and confirmed that the quantification now covers the entire crediting period. This finding is closed. 2. Thank you for the clarification. The VVB reviewed the updated quantification workbooks and confirmed that the quantification now covers the entire crediting period. This finding is closed. 3. Thank you for the clarification. The VVB reviewed the updated quantification workbooks and confirmed that the leakage and buffer calculations are calculated correctly. This finding is closed. 4/4a. Thank you for the clarification. The VVB reviewed the updated quantification workbooks and confirmed that the prorating of carbon stocks prior to the calculation of ERTs results in the same value of ERTs when only prorating ERTs. The VVB is reasonably assured that the Project's ERT quantification is appropriately calculated. 5. Thank you for the clarification. The VVB reviewed the updated quantification workbooks and confirmed that the leakage and buffer calculations are calculated correctly. This finding is closed. 6. The VVB reviewed the updated quantification and is reasonably assured that the quantification of vintages is accurate. This finding is closed. 7. In review of the Coastal Edge_RP 1_ ACR calcs_MonReport.xlsx and Coastal Edge_ACRcalcs_20240326.xlsx workbooks the VVB noted that the parameters "BSL Stocks" and "Project Stocks" do not appear to be calculated correctly. The VVB notes that the methodology does not explicitly provide equations for the calculation of total BSL and Project stocks; however, the VVB is requesting clarification as to how the values estimated by the Project are an accurate reflection of the BSL and Project carbon stocking.
Round 2 NCR/CL/OFI	CL: Please clarify in line with finding 7 and update the quantification as necessary.
Round 2 Response from Project Proponent (05 August 2024)	7. We have reviewed the "Project Stocks" and "BSL Stocks" in the ACR calcs sheet and agree that this could be updated to more accurately reflect project and baseline stocking. The template ACR ERT calculator posted to the ACR website uses live+dead carbon for the project and baseline carbon stocks depicted on their graphs. We have updated our equations in the ACR calcs workbooks accordingly. Fig. E2 in the GHG Plan has been updated as well.
Aster Global Round 3 Findings (16 August 2024)	Thank you for the clarification, the VVB reviewed the updated Calcs sheet and is reasonably assured that the graph meets the intention of the methodology. This finding is closed.

Item Number	69

ACR IFM Methodology January 2022, v2.0 (Section)	8 CALCULATION OF ERTS
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 25
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge GHG Plan_20231004, Coastal Edge_ACRcalcs_20231004.xlsx, Coastal Edge_RP 1_MR_20231004
Aster Global Round 1 Findings (15 January 2024)	The Coastal Edge_ACRcalcs_20231004.xlsx and MR reports the Risk score as 13.94%; however, the GHG Plan states 13.92%. It is unclear if this this equation is applied correctly. The Project appears to account for negative buffer contributions within their ERT reporting which does not appear to be correct based on the ERT Calculator provided on the ACR website.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the findings and update the Project Documents and ERT workbook as necessary. NCR: Please updated the project ERT quantification to ensure that negative buffer contributions are not considered within the ERT workup.
Round 2 Response from Project Proponent (28 March 2024)	We quantified the risk buffer percentage using v2.0 of the tool (public comment version) because we expected that ACR would formally approve this tool for use by the end of 2023. As v2.0 of the tool is still pending, we need to quantify the risk buffer percentage using the currently approved version (v1.0) instead. The Risk score has been updated in the GHG Plan, MR, MR Appendix, and associated calculation workbooks. Thank you for pointing out the negative buffer contribution. The ACR calcs sheet has been updated to distinguish between C ACR,t and ERT RP,t. Reversals and negative stock change are accounted for in a separate section in line with ACR's example calculator. We also added a nested IF() statement according to guidance from ACR on avoiding negative reductions when removals > reductions for a given RP. See the attached email "The Climate Trust Mail - IF() statement for negative reduction.pdf"

Aster Global Round 2 Findings (25 June 2024)	Thank you for the clarification. The VVB has assessed the Project's risk score (18%), for a detailed review please see the Risk Tool Tab. The VVB confirmed that the GHG Plan has been updated appropriately. This finding is closed. The VVB reviewed the updated ACR Calcs workbooks and is reasonably assured that the updated calculations are correct. This finding is closed.
Round 2 NCR/CL/OFI	
Round 2 Response from Project Proponent (05 August 2024)	
Aster Global Round 3 Findings (16 August 2024)	
Round 3 NCR/CL/OFI	
Round 3 Response from Project Proponent (27 August 2024)	
Aster Global Round 4 Findings 27 September 2024	The VVB notes that the updated buffer contribution reported in Section VI.5 of the MR for year 2022 appears to be incorrect (a typo).
Round 4 NCR/CL/OFI	CL: Please ensure the buffer contribution is reported correctly for the RP.
Round 4 Response from Project Proponent (30 September 2024)	Thank you for this correction. The typo in Section VI.5 has been corrected.
Aster Global Final Findings 30 September 2024	The VVB confirms that the buffer contribution has been reported correctly. This finding is closed.

Item Number	70
ACR IFM Methodology January 2022, v2.0 (Section)	8 CALCULATION OF ERTS
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 27
Applicability to the Project (Y or N/A)	Y

Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_ACR calcs_RP 1_20231004.xlsx, Coastal Edge_RP 1_MR_20231004
Aster Global Round 1 Findings (15 January 2024)	The VVB reviewed the Coastal Edge_ACR calcs_RP 1_20231004.xlsx workbook and noted that the number of days within the reporting period is calculated correctly. Specifically, it appears that the total days in the Vintage 2023 is reported incorrectly.
Round 1 NCR/CL/OFI	NCR: Please update the quantification workbook, all downstream quantification, and reporting documentation.
Round 2 Response from Project Proponent (28 March 2024)	We have updated the CAL calculation to be (end_date - start_date + 1). Subtracting two dates in excel gives the number of days between the two dates, not the total number of days. For example, subtracting 1/2/2022 - 1/1/2022 gives you 1 day in excel, while we really want to know that there were two total days. The workbook "Coastal Edge_ACR calcs_*.xlxs' has been updated accordingly.
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the updated ACR Calcs workbook and confirmed that the number of days for each vintage is now calculated correctly. This finding is closed.

Item Number	71
ACR IFM Methodology January 2022, v2.0 (Section)	2.2 PROJECT GEOGRAPHIC BOUNDARY
ACR IFM Methodology January 2022, v2.0 (Description)	The Project Proponent must provide a detailed description of the geographic boundary of project activities. Note that the project activity may contain more than one discrete area of land, that each area must have a unique geographical identification, and that each area must meet the eligibility requirements. Information to delineate the project boundary must include the following:
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	GHG Plan
Aster Global Round 1 Findings (15 January 2024)	Pending the finding issued for the requirement "Project area map, delineated on a geographic information system;"
Round 1 NCR/CL/OFI	

Round 2 Response from Project Proponent (28 March 2024)	
Aster Global Round 2 Findings (25 June 2024)	The statement "The Coastal Edge Improved Forest Management (IFM) project is composed of approximately 3,500 acres of coastal rainforest..." appears not updated to the current project area
Round 2 NCR/CL/OFI	CL: Please clarify in line with finding and update the GHG Plan as necessary.
Round 2 Response from Project Proponent (05 August 2024)	This statement has been updated to "approximately 3,290 acres" in the GHG plan.
Aster Global Round 3 Findings (16 August 2024)	The statement in question has been correctly revised in Coastal Edge GHG Plan_20240805. Closed.

Item Number	72
ACR IFM Methodology January 2022, v2.0 (Section)	3 STRATIFICATION
ACR IFM Methodology January 2022, v2.0 (Description)	If the project activity area is not homogeneous, stratification may be used to improve the modeling of management scenarios and precision of carbon stock estimates. If stratification is used, a stratification standard operating procedures (SOP) document detailing relevant design, inputs, parameters, rules, and techniques must be provided as an attachment to the initial GHG Project Plan for validation. The stratification SOP document should contain information necessary such that the stratification can be examined and duplicated as necessary to provide reasonable assurance of the validity and non-bias of associated techniques. The stratification must be the same for the baseline and with-project scenarios for the estimates of initial stocking levels. However, the number and boundaries of strata may change during the crediting period (ex post) as baseline and with-project management practices diverge. For estimation of initial carbon stocks, strata may be defined on the basis of parameters correlated to forest carbon stocking, for example:
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	

Aster Global Round 1 Findings (15 January 2024)	Pending LEMMA finding
Round 1 NCR/CL/OFI	
Round 2 Response from Project Proponent (28 March 2024)	
Aster Global Round 2 Findings (25 June 2024)	The VVB notes that the description for stratification in the GHG Plan in Section E2 has been revised. It is unclear if the Project has a stratification SOP developed. Section E2 references the Inventory SOP but not a stratification SOP. The description of Stratification in section E2 is appears limited with regards to requirements needed for a Stratification SOP as detailed in Section 3, particularly " The stratification SOP document should contain information necessary such that the stratification can be examined and duplicated as necessary to provide reasonable assurance of the validity and non-bias of associated techniques. "
Round 2 NCR/CL/OFI	CL: Please clarify in line with finding
Round 2 Response from Project Proponent (05 August 2024)	A stratification SOP document has been added to the R2 - Supplemental Materials folder.
Aster Global Round 3 Findings (16 August 2024)	The VVB has reviewed the Stratification SOP document. This contains sufficient elaboration on steps to provide reasonable assurance of the validity and non-bias of associated techniques

Item Number	73
ACR IFM Methodology January 2022, v2.0 (Section)	4.2
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 2
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_ACRcalcs_20231004.xlsx
Aster Global Round 1 Findings (15 January 2024)	This item is pending several findings related to baseline values.
Round 1 NCR/CL/OFI	

Round 2 Response from Project Proponent (28 March 2024)	
Aster Global Round 2 Findings (25 June 2024)	1. It is unclear to the VVB why the starting stocks for dead trees does not match the value derived from the inventory.
Round 2 NCR/CL/OFI	CL: Please clarify in-line with the finding and update the quantification workbooks and project documentation as necessary.
Round 2 Response from Project Proponent (05 August 2024)	The CoastalEdge_bsl_SnagDet_*.xlsx workbook has been updated to match the starting stock of standing dead trees with the inventory.
Aster Global Round 3 Findings (16 August 2024)	The VVB notes that standing dead stocks are assumed to have not changed between the inventory and start date. The VVB is able to reconstruct the project wide average of 11.36 tCO2e/ac of standing dead stock as of the start date as calculated in CoastalEdge_InventoryCalcs_20240802 and used in CoastalEdge_bsl_SnagDet_20240627. The VVB also notes that this value is correctly reported in the GHG Plan in Table E8, E12, E15 and E18.

Item Number	74
ACR IFM Methodology January 2022, v2.0 (Section)	4.2.2
ACR IFM Methodology January 2022, v2.0 (Description)	Step 2 Adjust the calculation of biomass in standing live trees to account for missing portions of the tree (i.e., cavities, broken tops, or other missing wood).
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_wp_livetreeproj_20231004.xlsx
Aster Global Round 1 Findings (15 January 2024)	Missing biomass is accounted for, pending the finding above related to middle and bottom deductions of 99%.
Round 1 NCR/CL/OFI	
Round 2 Response from Project Proponent (28 March 2024)	

Aster Global Round 2 Findings (25 June 2024)	The VVB found that several trees had a different % missing in the baseline FVS treeinit than was calculated in the inventory workbook. These are off between 0.5% and 1.2%. For example this is tree 24091 in FVS which had an Mdefect of 34% but a calculated 35% missing in the inventory, and tree 26203 which had an MDefect of 6% but a calculated 6.5% missing in the inventory. It is unclear why these are different. This is affecting the carbon stocks in CoastalEdge_bsl_live_20240325
Round 2 NCR/CL/OFI	CL: Please clarify in line with finding
Round 2 Response from Project Proponent (05 August 2024)	The calculations of carbon stock for standing live trees is based on the field MDefect as output by FVS, e.g. in CoastalEdge_wp_livetreeproj_20240709. Because FVS rounds defect, to the nearest percentage, the percent missing does not align with the percent missing recorded in the inventory workbook. Given the relative non-materiality, the VVB issues this as an opportunity for improvement.
Aster Global Round 3 Findings (16 August 2024)	OFI: To ensure consistency across workbooks (e.g. when comparing quantification methods using the inventory workbook and with those using FVS outputs), ensure the missing material is not truncated/rounded.

Item Number	75
ACR IFM Methodology January 2022, v2.0 (Section)	4.4
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 12
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_ACRcalcs_20240326.xlsx
Aster Global Round 1 Findings (15 January 2024)	Pending findings related to the baseline.
Round 1 NCR/CL/OFI	
Round 2 Response from Project Proponent (28 March 2024)	
Aster Global Round 2 Findings (25 June 2024)	The VVB reviewed the application of Equation 12 and noted that it is not applied correctly.

Round 2 NCR/CL/OFI	NCR: Please ensure that Equation 12 is applied correctly and update the quantification.
Round 2 Response from Project Proponent (05 August 2024)	Thank you for the correction. The baseline HWP term was entered twice in both the numerator and the denominator. The Coastal Edge_ACRcalcs_*.xslx workbook has been updated. While the baseline uncertainty is unchanged at 9.41%, downstream credit calculations will be checked and updated as necessary.
Aster Global Round 3 Findings (16 August 2024)	The VVB reviewed the updated Equation 12 and found that the application of Equation 12 has been updated and that the equation is now applied correctly; however, the VVB notes that UNCBSL will change over time and this is not reflected in the ex-ante ERT calcs. This is does not lead to a material error and therefore will be issued as an OFI. Additionally, the VVB noted that the Uncertainty tab of the ERT workbooks has not been updated based on the latest inventory calculations provided to the VVB in the CoastalEdge_InventoryCalcs_20240802.xlsx.
Round 3 NCR/CL/OFI	OFI: Updated the calculation of UNCBSL and UNCPRJ to be dynamic over the 20 year ex-ante calculations. NCR: Please ensure that the updates to the inventory are reflected in the ERT workbooks, update all downstream quantification, and update the Project documents as necessary.
Round 3 Response from Project Proponent (27 August 2024)	The UNCbsl calculation has been updated to be dynamic over the crediting period. The Uncertainty tab has been updated with the latest inventory calculations documented in CoastalEdge_InventoryCalcs_20240802.xlsx. Downstream documentation has been updated.
Aster Global Round 4 Findings 27 September 2024	The VVB notes that the equation has been applied correctly. The inventory updates have been reflected in the ERT workbooks. This finding is closed.

Item Number	76
ACR IFM Methodology January 2022, v2.0 (Section)	5.3
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 14
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y

Evidence Used to Assess (Location in PD, MR or Supporting Documents	ERT Calc workbook
Aster Global Round 1 Findings (15 January 2024)	Pending findings related to carbon stock quantification above.
Round 1 NCR/CL/OFI	
Round 2 Response from Project Proponent (28 March 2024)	
Aster Global Round 2 Findings (25 June 2024)	1. The VVB noted that the column D of the wp proj tab in the Coastal Edge_ACRcalcs_RP 1_20240326.xlsx workbook does not match the value derived from the inventory. 2. The column headers in the wp proj tab of the Coastal Edge_ACRcalcs_RP 1_20240326.xlsx workbook are not accurate, the VVB is issuing an OFI.
Round 2 NCR/CL/OFI	CL: Please clarify the discrepancy noted by the VVB in Finding 1 and update the Project quantification and project documents as necessary. OFI: Ensure that the column headers in the quant workbooks are accurate.
Round 2 Response from Project Proponent (05 August 2024)	1. Thank you for the correction. The wp standing dead value changed due to minor GIS edits which affected this area-weighted average. The wp standing dead value has been upated to the correct value in both workbooks. 2. Column headers in the 'wp proj' tabs of the *Coastal Edge_ACRcalcs_*.xlsx* and *Coastal Edge_ACRcalcs_RP 1_*.xlsx* workbooks have been edited for clarity.
Aster Global Round 3 Findings (16 August 2024)	The VVB notes that the following workbooks all use the same acres for strata: CoastalEdge_wp_livetreeproj_20240709, CoastalEdge_InventoryCalcs_20240802, CoastalEdge_bsl_SnagDet_20240627, CoastalEdge_bsl_live_20240627, and CoastalEdge NPV_Analysis_20240715. The first finding is closed as Equation 14 is correctly implemented. The VVB also notes the Proponent has elected to respond to the OFI by modifying column headers in the quant workbooks.

Item Number	77
ACR IFM Methodology January 2022, v2.0 (Section)	5.6
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 20

Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_ACRcalcs_20231004.xlsx
Aster Global Round 1 Findings (15 January 2024)	The VVB noted that Equation 20 is not applied correctly as the parameter GHGp is no longer included in this equation.
Round 1 NCR/CL/OFI	NCR: Please ensure that the methodology equations are applied appropriate and update the Project quantification and Project documents.
Round 2 Response from Project Proponent (28 March 2024)	
Aster Global Round 2 Findings (25 June 2024)	
Round 2 NCR/CL/OFI	
Round 2 Response from Project Proponent (05 August 2024)	Thank you for the correction. References to a GHG p,t parameter are hold-overs from calculations under v1.3 of the methodology. References to the GHG p,t parameter have been removed from the *Coastal Edge_ACRcalcs_*.xlsx* and *Coastal Edge_ACRcalcs_RP 1_*.xlsx* workbooks.
Aster Global Round 3 Findings (16 August 2024)	Thank you for the clarification, the VVB confirms that this equation is now applied correctly.

Item Number	78
ACR IFM Methodology January 2022, v2.0 (Section)	8 CALCULATION OF ERTS
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 30 (**USE EQUATION 30 from ERRATA & CLARIFICATIONS 2024-05-09)**
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y

Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_ACRcalcs_RP 1_20240326.xlsx,
Aster Global Round 1 Findings (15 January 2024)	Pending findings above.
Round 1 NCR/CL/OFI	
Round 2 Response from Project Proponent (28 March 2024)	
Aster Global Round 2 Findings (25 June 2024)	The VVB notes that the ACR has published an Errata & Clarifications document which contains an update to the calculation of removals. The Coastal Edge_RP 1_ ACR calcs_MonReport.xlsx and Coastal Edge_ACRcalcs_20240326.xlsx workbooks contain removal equations that are incorrect.
Round 2 NCR/CL/OFI	NCR: Please update the referenced ACR calculation workbooks to apply the correct removal quantification and ensure that all relevant project documentation is updated.
Round 2 Response from Project Proponent (05 August 2024)	*Coastal Edge_ACRcalcs_*.xlsx* and *Coastal Edge_ACRcalcs_RP 1_*.xlsx* workbooks have been updated to include the new REM equation from ACR's Errata & Clarifications. All documents have been updated with the new ERT values.
Aster Global Round 3 Findings (16 August 2024)	The VVB reviewed the update workbooks and was able to confirm that the new removals equation has been applied appropriately. This finding is closed.

Item Number	79
ACR IFM Methodology January 2022, v2.0 (Section)	4.2
ACR IFM Methodology January 2022, v2.0 (Description)	Equation 1
Applicability to the Project (Y or N/A)	Y
Requirement Met (Y, N, Pending)	Y
Evidence Used to Assess (Location in PD, MR or Supporting Documents	Coastal Edge_ACRcalcs_20231004.xlsx

Aster Global Round 1 Findings (15 January 2024)	This item is pending several findings related to baseline values.
Round 1 NCR/CL/OFI	
Round 2 Response from Project Proponent (28 March 2024)	
Aster Global Round 2 Findings (25 June 2024)	
Round 2 NCR/CL/OFI	
Round 2 Response from Project Proponent (05 August 2024)	
Aster Global Round 3 Findings (16 August 2024)	It is unclear why, in CoastalEdge_bsl_live_20240627, cell AR 25, which purports to be the 2041 RMA and no RMA (let grow) stock in the LOW stratum references cell K8 which is the carbon stock in 2051
Round 3 NCR/CL/OFI	CL: Please clarify in line with finding and update quantification workbooks and the GHG Plan and MR as necessary.
Round 3 Response from Project Proponent (27 August 2024)	
Aster Global Round 4 Findings 27 September 2024	The VVB reviewed the updated "CoastalEdge_bsl_live_20240906.xlsx" and confirms that the correct RMA stocks are referenced. This finding is closed.

Appendix B – List of Documents Received

Document Name	Date Received
Coastal Edge_RP 1_ MR Appendix_20231004.docx	10/4/2023
Coastal Edge_RP 1_MR_20231004.docx	10/4/2023
Coastal Edge_ACR calcs_RP 1_20231004.xlsx	10/4/2023
Coastal Edge_ACRcalcs_20231004.xlsx	10/4/2023
Coastal Edge_CommonPractice.xlsm	10/4/2023
CoastalEdge NPV_Analysis_20231004.xlsx	10/4/2023
CoastalEdge_InventoryCalcs_20230904.xlsx	10/4/2023
Site Index - WH.xlsx	10/4/2023
Site Index Calculation_TreeCore.xlsx	10/4/2023
Coastal Edge_bsl_live_20231004.xlsx	10/4/2023
Coastal Edge_bsl_sngproj_20231004.xlsx	10/4/2023
Coastal Edge_ProjectBackup_2023-10-04.zip	10/4/2023
Coastal Edge_wp_livetreeproj_20231004.xlsx	10/4/2023
CoastalEdge_bsl_hwpproj_20231004.xlsx	10/4/2023
RR_FVS_TreeInIt_Degrow20231004.xlsx	10/4/2023
RR_FVS_TreeInIt_Original.xlsx	10/4/2023
Treelist and DBHGrow5_20232004.xlsx	10/4/2023
Coastal Edge GHG Plan_20231004.docx	10/4/2023
Coastal Edge_GHG Plan Appendix A_ACR Environmental and Social Impact Assessment Report V1.docx	10/4/2023
Coastal Edge_GHG Plan Appendix B_ACR AFOLU Project SDG Contribution Report.pdf	10/4/2023
Coastal Edge_GHG Plan Appendix C_deeds.PDF	10/4/2023
Coastal Edge_GHG Plan Appendix D_ACR Multi Site Design Document.pdf	10/4/2023
Coastal Edge_GHG Plan Appendix E_Risk Calculation.xlsx	10/4/2023
Coastal Edge_GHG Plan Appendix F_2022 NCLC Carbon Development Agreement Executed_Redacted.pdf	10/4/2023
Coastal Edge_GHG Plan Appendix I_Carbon Inventory SOPs.docx	10/4/2023
Coastal Edge_ACR AFOLU Project SDG Contribution Report.pdf	10/4/2023
Coastal Edge_ACR AFOLU Project SDG Contribution Report.xlsm	10/4/2023
Coastal Edge Taxlot_20230616.zip	10/4/2023
Coastal Edge_ProjectArea_20230613.zip	10/4/2023
CoastalEdge_Strata_NoRMAnew.zip	10/4/2023
CoastalEdge_Strata_wRMACEDS.zip	10/4/2023
Stream_Rainforest Reserve_20230804.zip	10/4/2023
23073.50 - TCT Coastal Edge -PROJECT LEVEL CLIENT SAFETY CHECKLIST.pdf	10/4/2023
CoastalEdge_TreeListGrowForward.xlsx	10/4/2023
TCT workplace policies_20231003.pdf	10/4/2023

Coastal Edge_DataManagementSOP.docx	10/4/2023
Coastal Edge_Qualifications.docx	10/4/2023
Email_Monitoring Update - RP 1.pdf	10/4/2023
Harvest Schedule for Profit_adapted to start date.pdf	10/4/2023
LTA Accreditation_North Coast Land Conservancy Renewal License Agreement.pdf	10/4/2023
rainforest_fmp.pdf	10/4/2023
Onion Peak CE deed to NCLC 11-6-14.PDF	10/4/2023
OnionPeak_map.pdf	10/4/2023
Rainforest Reserve OWEB CE - recorded.pdf	10/4/2023
Forestrycontract _ 2023__NCNC_DDFORESTRY.pdf	10/4/2023
NCLC_2023thin.zip	10/4/2023
RainforestReserve_InventoryCalcs_PCT 2023.xlsx	10/4/2023
FloodHazard_Rainforest.zip	10/4/2023
Wildfire Hazard_RR.zip	10/4/2023
dblbnd.adf	10/4/2023
hdr.adf	10/4/2023
metadata.xml	10/4/2023
prj.adf	10/4/2023
sta.adf	10/4/2023
vat.adf	10/4/2023
w001001.adf	10/4/2023
w001001x.adf	10/4/2023
Rainforest_Plots_Final_20230607.zip	10/20/2023
FVSOut_CoastalEdge_forDe-grow.db	11/21/2023
23073.50 Coastal Edge Round 1 Findings 20240324.xlsx	4/1/2024
Coastal Edge_RP 1_ MR Appendix_20240327.docx	4/1/2024
Coastal Edge_RP1_MR_20240327_signed.pdf	4/1/2024
ArchCapefinal_CruiserData_20240325.xlsx	4/1/2024
Coastal Edge_ACRcalcs_20240326.xlsx	4/1/2024
Coastal Edge_ACRcalcs_RP 1_20240326AG.xlsx	4/1/2024
Coastal Edge_CommonPractice_20240130.xlsm	4/1/2024
Coastal Edge_ProjectBackup_GegrowRun_R1.zip	4/1/2024
CoastalEdge NPV_Analysis_20240325.xlsx	4/1/2024
CoastalEdge_InventoryCalcs_20240325.xlsx	4/1/2024
Site Index - WH_20240325.xlsx	4/1/2024
Site Index Calculation_TreeCore_20240325.xlsx	4/1/2024
CoastalEdge_bsl_hwpproj_20240325.xlsx	4/1/2024
CoastalEdge_bsl_live_20240325.xlsx	4/1/2024
CoastalEdge_bsl_SnagDet_20240325.xlsx	4/1/2024
CoastalEdge_FVS_2024-03-25.zip	4/1/2024

CoastalEdge_wp_livetreeproj_20240325.xlsx	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554.key	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554.out	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_index.svs	4/1/2024
3e33df7c-f435-49e9-974b-99902d9ffd4a.key	4/1/2024
3e33df7c-f435-49e9-974b-99902d9ffd4a.out	4/1/2024
3e33df7c-f435-49e9-974b-99902d9ffd4a_index.svs	4/1/2024
7e4d04a8-aded-48d0-9051-101e6a07d6c0.key	4/1/2024
7e4d04a8-aded-48d0-9051-101e6a07d6c0.out	4/1/2024
7e4d04a8-aded-48d0-9051-101e6a07d6c0_index.svs	4/1/2024
e1056d9c-3563-4bbf-bca0-f6d48e081608.key	4/1/2024
e1056d9c-3563-4bbf-bca0-f6d48e081608.out	4/1/2024
e1056d9c-3563-4bbf-bca0-f6d48e081608_index.svs	4/1/2024
FVS_Data.db	4/1/2024
FVSOnline.log	4/1/2024
FVSOut.db	4/1/2024
FVSProject.db	4/1/2024
projectId.txt	4/1/2024
SpatialData.RData	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_001.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_002.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_003.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_004.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_005.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_006.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_007.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_008.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_009.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_010.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_011.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_012.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_013.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_014.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_015.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_016.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_017.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_018.svs	4/1/2024
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201da2b0-e389-49ac-8d98-c59fe86dd554_021.svs	4/1/2024

201da2b0-e389-49ac-8d98-c59fe86dd554_022.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_023.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_024.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_025.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_026.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_027.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_028.svs	4/1/2024
201da2b0-e389-49ac-8d98-c59fe86dd554_029.svs	4/1/2024
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