



Validation Report

Document Prepared by City Forest Credits

11/14/2022

PROJECT OVERVIEW

<i>Project Name</i>	Pierce Conservation District Reforestation Program – 2022 Project: South Prairie Creek Preserve – North Floodplain Planting Project
<i>Project Registry Number</i>	017
<i>Project Type</i>	Tree Planting
<i>City Forest Credits Protocol Version</i>	Version 9, February 7, 2021
<i>Project Start Date</i>	March 31, 2022
<i>Project Location</i>	South Prairie, WA
<i>Project Operator</i>	Pierce Conservation District

SUMMARY

State what stage of crediting this Validation Report applies to (i.e. after planting, Year 4, 6, 14, or 26). Provide a few sentences about the overall project. Include the Planting Design and Quantification Method.

This Validation Report is for the initial crediting after planting in Year 0.

Between October 1, 2021 and March 31, 2022, the Pierce Conservation District, in partnership with Washington Conservation Corps and Earth Corps, planted 5,842 trees on 12.16 of South Prairie Creek using the cluster planting design and quantification method.

This project restored native vegetation to riparian and floodplain habitat along South Prairie Creek, a tributary to the Carbon River in the Puyallup-White River watershed. Planting was completed in areas between a newly constructed half-mile side channel and Silver Springs Creek, a tributary to South Prairie Creek. This planting is part of a larger effort to improve salmon habitat and restore floodplain processes.

ELIGIBILITY

Project Operator Identity (Section 1.1)

Criteria

A Project requires at least one Project Operator (“PO”), an entity organized and licensed under the laws of its jurisdiction, or a governmental body, which undertakes a Project, registers it with the registry of City Forest Credits (the “Registry”), and is ultimately responsible for all aspects of the project and its reporting.

Issue Validated

Pierce Conservation District is the Project Operator. Conservation Districts are a governmental subdivision of Washington state and thus PCD is a governmental body.

Project Submittal Dates (Section 7)

Criteria

Under Tree Planting Protocol Version 10, Project must submit applications to the Registry within six months of the date of the planting of the last tree that is part of the planting project. While the six-month deadline was not required for Tree Planting Protocol Version 9, City Forest Credits recommended that the Project Operator submit the application within that timeframe. Under Planting Protocol Version 9, Project must submit all initial crediting documentation within 12 months of application approval by the Registry. Project with plantings prior to May 1, 2017 are not eligible.

Issue Validated

Project Operator submitted the application on May 25, 2022, which was within six months of the date of planting the last project tree (March 31, 2022).

Project Operator submitted initial crediting documents by October 5, 2022, which was within 12 months of application approval on June 2, 2022.

Permanence – Project Duration and Reversals (Section 1.2, 5, 10)

A. Project Duration – Project Implementation Agreement (Section 1.2 and 5)

Criteria

Project Operator must sign a Project Implementation Agreement with the Registry setting forth the Project Operator's obligation to comply with the protocol. Project Operator must monitor and report for 25 years.

Issue Validated

Pierce Conservation District and City Forest Credits signed a Project Implementation Agreement with effective date of March 11, 2022, for the Pierce Conservation District Reforestation Program – 2022 Project: South Prairie Creek Preserve – North Floodplain Planting Project (Project Registry Number 017). The project has a 25-year duration under City Forest Credits Tree Planting Protocol Version 9.

B. Reversals (Section 10)

Criteria

A "Reversal" is loss of stored carbon such that the remaining stored carbon within the Project Area is less than the amount of stored carbon for which Registry credits have been issued. The Registry will retain in a Reversal Pool account 5% of all credits issued to planting projects. This Reversal Pool account shall be used to compensate for Unavoidable Reversals.

Issue Validated

The Project Design Document and request for credits based on GHG mitigation includes a 5% deduction for the Reversal Pool account of credits. 313 credits were contributed from this Project to the Registry Reversal Pool. The carbon quantification and Reversal Pool deduction were verified by the Validation and Verification Body, Matthew Lee.

Project Location (Section 1.3)

Criteria

Project Area must be located in parcels within or along the boundary of at least one of the urban area criteria. The Project Operator must specify the Project Area and provide an electronic map of the Project area.

Issue Validated

The Project is located in South Prairie, WA, within an “urban area” per the U.S. Census Bureau (2010), which meets protocol criteria Section 1.3A. The Project Operator has provided maps as supporting evidence, including regional-scale and project area maps.

Project Area (Section 8)

Criteria

The Project Operator may include more than one planting site in a project. The initial planting of trees for all properties in a project must occur within a 36-month period or less.

Issue Validated

The Project includes 5,842 trees planted in 12.16 acres over a 6-month period. The Project Area is spread across six parcels in South Prairie Creek, three owned by Pierce Conservation District (10.08 acres in parcel numbers 0519132700, 0519132017, and 0519131030) and three owned by Pierce County Surface Water Management (2.08 acres in parcel numbers 0519132027, 0519132028, and 0519132029). The trees were planted between October 1, 2021 and March 31, 2022. The Project Operator signed an Attestation of Planting and provided invoices of purchased trees. The Project Operator also provided a signed Attestation of Planting Affirmation from the Washington Conservation Corps at the Washington Department of Ecology.

Ownership or Eligibility to Receive Potential Credits (Section 2)

Criteria

Project Operator must demonstrate ownership of potential credits or eligibility to receive potential credits.

Issue Validated

Pierce Conservation District is the landowner for three of the six Project Area parcels (parcel numbers 0519132700, 0519132017, and 0519131030), meeting protocol criteria Section 2A. The Project Operator provided a signed Attestation of Land Ownership as supporting documentation.

Pierce County Surface Water Management is the landowner for the remaining three of the six Project Area Parcels (parcel numbers 0519132027, 0519132028, and 0519132029). The Project Operator provided a signed Agreement to Transfer Credits with Pierce County Surface Water Management (known as the Use of Real Property and Carbon Credit Agreement between Pierce County and Pierce Conservation District) as supporting documentation, meeting protocol criteria Section 2C.

Additionality (Section 4)

Criteria

The City Forest Credits Standard and Tree Planting Protocol ensure additionality for every carbon project. A project activity is additional if it can be demonstrated that the activity results in emission reductions or removals that are in excess of what would be achieved under a “business as usual” scenario and the activity would not have occurred in the absence of the incentive period provided by the carbon markets.

Projects must demonstrate the following:

- A Legal Requirements Test that declares city trees planted due to an enacted law or ordinance not eligible (Section 4B);
- Either 1) a project-specific baseline or 2) the current version of the Registry’s performance standard baseline developed in adherence with the WRI GHG Protocol (CFC Standard);
- Project Operators must sign and comply with a Project Implementation Agreement with the Registry that requires a 25-year Project Duration.

Issue Validated

Project Operator has met the Legal Requirements Test that the trees were not planted due to an enacted ordinance or law. Project Operator used the Registry’s performance standard baseline, which is attached to the Project Design Document, in adherence with the Performance Standard methodology set out in the World Resources Institute Greenhouse Gas Protocol for Project Accounting. Project Operator signed a Project Implementation Agreement with the Registry for a 25-year Project Duration.

Project Operator has signed an Attestation of Additionality that confirms the above, as well as stating that the 25-year Project Duration is in addition to and longer than any commitment the Project Operator makes to non-carbon project tree plantings and that trees were not planted on sites that were forested and then cleared of trees within the prior 10 years.

No Double Counting and No Net Harm

Criteria

The Tree Planting Protocol Version 10 describes prevention of double-counting in Section 5.1 and the “No Net Harm” Principle in Section 5.2. Project activities shall not cause net harm to the environment or urban communities. While not required under Tree Planting Protocol Version 9, CFC recommended that the Project Operator sign an Attestation of No Double Counting of Credits and No Net Harm.

Issue Validated

Project Operator has submitted a signed Attestation of No Double Counting of Credits and a signed attestation of No Net Harm, and the Registry sees no evidence of net harm from this project. The Registry has reviewed the records of prior projects to confirm that the Project Area for this project has not already received credits under the CFC Standard.

Carbon Quantification (Section 12 and Appendix B)

Criteria

Project Operator must follow the quantification methods outlined in Appendix B of the Protocol.

Issue Validated

Project Operator used the cluster planting design and quantification method, per Protocol criteria in Section 12 and Appendix B. Project Operator signed the Attestation of Planting, including attachments of invoices of trees purchased and planting photos. Project Operator provided an Attestation of Planting Affirmation signed by the Washington Conservation Corps at the Washington Department of Ecology.

The Carbon Quantification Summary is as follows:

Total number of trees planted	5,842
Project area (acres), if applicable	12.16
Total number of trees per acre, if applicable	478
Credits attributed to the project (tCO ₂ e)	7,833
Credits after mortality deduction (default is 20%)	6,266
Contribution to Registry Reversal Pool Account (5%) (tCO ₂ e)	313
Total credits to be issued to the Project Operator (tCO₂e)	5,953
Total credits requested to be issued in Year 1 (10% of above)	595

GHG Assertion: Project Operator asserts that the Project results in GHG emissions mitigation of 5,953 tons CO₂e. Project Operator will provide imaging of canopy growth over the Project Area, quantify tons CO₂e, and submit documentation for verification and credit issuance at Year 4, 6, and after Year 25 per the Tree Protocol and Cluster Quantification Methodology.

Project Operator asserts that the Project results in GHG emissions mitigation of 595 tons CO₂e after initial tree planting.

Co-Benefits Quantification (Section 12 and Appendix B)

Criteria

Project Operator must follow the co-benefit quantification methods for rainfall interception, air quality, and energy savings.

Issue Validated

Project Operator has followed the co-benefits quantification method using the templates provided by City Forest Credits. The following table documents the quantified ecosystem services in resource units and avoided costs per year when Project Trees reach 25 years old.

<i>Ecosystem Services</i>	<i>Resource Units</i>	<i>Value</i>
Rainfall Interception (m ³ /yr)	24,376.06	\$178,953.04
Air Quality (t/yr)	-0.9294	\$1,810.74
Energy: Cooling – Electricity (kWh/yr)	51,069.28	\$2,614.75
Energy: Heating – Natural Gas (kBtu/yr)	156,015.66	\$1,776.03
Grand Total (\$/yr)		\$185,154.56

Monitoring and Reporting (Appendix A)

Criteria

Project Operator must report on tree conditions across the Project Area for the Project Duration. Reports must be submitted annually on the anniversary of the date of the first Verification Report. At Years 4, 6, and after Year 25, sampling, measurement of trees or canopy coverage, and/or quantification of CO₂e will be submitted for request of credit issuance in lieu of a monitoring report that year.

Issue Validated

Project Operator has agreed to submit written annual monitoring reports using the template provided by City Forest Credits. Monitoring plans have been described in the Project Design Document.

VERIFICATION REPORT

CFC reviewed the Verification Report dated November 13, 2022 by Matthew Lee to ensure it accurately reflects the documentation contained in the Project Design Document and supporting documents.

VALIDATION CONCLUSION

I attest that all the information provided in this validation report is free of material misstatement, to the best of my knowledge. The project complies with the validation criteria outlined in the City Forest Credits Standard and Tree Planting Protocol Version 9.

Approved by City Forest Credits on November 14 in 2022.