



# **Winton and Westmark Woods Forest Preservation Project Validation Report**

Document Prepared by City Forest Credits

July 23, 2024

## PROJECT OVERVIEW

<i>Project Name</i>	Winton and Westmark Woods Forest Preservation Project
<i>Project Registry Number</i>	55
<i>Project Type</i>	Tree Preservation
<i>City Forest Credits Protocol Version</i>	Version 12.40, February 22, 2023
<i>Project Start Date</i>	November 14, 2023
<i>Project Location</i>	Winton: City of Cincinnati, Ohio; Westmark: Springfield Township, Hamilton County, Ohio
<i>Project Operator</i>	Cardinal Land Conservancy (“Cardinal”)

## SUMMARY

*Provide a few sentences about the overall project*

Cardinal Land Conservancy, the Project Operator, is preserving two disjunct properties called Winton Nature Preserve and Westmark Woods Nature Preserve, as one 26.77 acre project. Both properties consist of native ruderal forest types due to mixed composition of climax forest species typical of the area, and generalist native species that colonize areas with historical disturbance. Cardinal is part of a regional conservation and planning coalition, Green Umbrella’s Greenspace Alliance (GUGA), and both the Winton and Westmark properties are included in the Prioritization Plans as part of the initiative.

## 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*

The Project Operator, Cardinal Land Conservancy, provided documentation, their 501c3 IRS Determination Letter, to City Forest Credits.

### **Project Submittal Dates (Section 2.1, 2.3)**

#### *Criteria*

Project must submit applications to the Registry within two years of the date of the Preservation Commitment. The Preservation Commitment must be recorded no later than 6 months after Registry Approval of the Project Application. Projects whose Preservation Commitment dates from prior to November 1, 2017 are not eligible.

*Issue Validated*

Project Operator submitted the application on November 14, 2023. The Preservation Commitment effective date is May 14, 2024, which is within 6 months of the Application Approval date of November 15, 2023 and meets protocol criteria Section 2.1 and 2.3.

**Permanence – Project Duration and Reversals**

**A. Project Duration (Section 1.2 and 2.2)**

*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 40 years.

*Issue Validated*

Cardinal Land Conservancy and City Forest Credits signed a Project Implementation Agreement on December 1, 2024, for the Winton and Westmark Woods Forest Preservation Project (Project Registry Number 55). The project has a 40-year duration under City Forest Credits Tree Preservation Protocol Version 12.40.

**B. Reversals (Section 9)**

*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 10% of all credits issued to preservation 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 10% deduction for the Reversal Pool of credits. 401 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, Todd Douglass.

**Project Location (Section 1.3 and 1.4)**

*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 with geospatial location.

*Issue Validated*

The Project is located in the City of Cincinnati, Ohio (Winton), which meets 1.3B, and within Springfield Township, Hamilton County, Ohio (Westmark), which meets protocol criteria Section 1.3A. The Project Operator has provided maps as supporting evidence, including geospatial location, regional-scale, and project area maps.

The 26.77-acre Project Area includes portions of disjunct parcel numbers: 11.19-acre area (part of parcel number 023700020016) in the City of Cincinnati, Ohio, and a 15.58 acre area (part of parcel number 059002300031) in Springfield Township, Hamilton County, Ohio.

The Project Area is in a location that receives more than 20 inches of precipitation per year and has more than 80% tree canopy, meeting protocol criteria Section 1.4 C. The Project Operator has provided an iTree Canopy report to demonstrate the percentage of canopy cover for the Project Area, which was determined to be 100%.

### **Ownership or Eligibility to Receive Potential Credits (Section 1.5)**

#### *Criteria*

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

#### *Issue Validated*

Cardinal Land Conservancy is the landowner for the Winton and Westmark Woods Forest Preservation Project, meeting protocol criteria Section 1.5A. The Project Operator provided copies of the recorded deeds of transfer, recorded 9/20/22 for Winton, and 11/17/2021 for Westmark, as supporting documentation.

### **Tree Preservation Commitment (Section 4.1)**

#### *Criteria*

Project Operator must demonstrate that trees in the Project Area are preserved for at least 40 years.

#### *Issue Validated*

The Project Operator recorded deed restrictions on May 14, 2024, declaring the protection of the trees on the Project Area.

Within Section 1 of the Declaration:

“Declarant shall not cut down, destroy, or remove trees located on the Property, except as necessary or desirable to control or prevent hazard, disease, or fire or to improve forest health. Recreational non-motor-use trails have negligible or de minimis impacts on biomass and carbon stock and are permissible.”

The project meets protocol criteria Section 4.1.

### **Demonstration of Threat of Loss (Section 4.2, 4.3, 4.4)**

#### *Criteria*

Project Operator must demonstrate that prior to the Preservation Commitment, the project trees were not preserved from removal. The Project Area must be in a land use designation that allows for at least one non-forest use and is not in an overlay zone that prohibits all development. The Project Area must

also meet one of three conditions that demonstrate threat of loss as described in Section 4.4 A, B, or C such as surrounding developed or improved uses, per acre value, or fair market value.

*Issue Validated*

The Project Operator signed an Attestation of Additionality on April 29, 2024, stating that prior to the start of the Project, the trees in the Project Area were not protected by easement, recorded encumbrance, or protected zoning status.

The Winton property is zoned as SF-6 Single-family Residential (6,000 sf). The SF-6 district is intended to provide areas for medium density, single-family residential land uses developed in subdivisions. The Project Operator removed 0.43 acres from the Project Area, a 25-foot buffer on either side. Although, as shown in Attachment 7c., the Cincinnati Zoning Office confirmed that at this time there are no zoning regulations for stream corridors, but Cardinal wanted to remain conservative.

The Westmark property is zoned as R-PUD, or Residential Planned Unit Development District. R-PUD allows any use permitted either as a principal or conditional use in the R-1, R-1A, R-2, or R-3 Districts. The residential districts are intended to provide areas for single-family residential land uses developed in subdivisions. 9.94 acres of the full parcel are within the FEMA-designated floodway and floodplain and were therefore removed from the project area.

The Project meets the Tree Preservation Protocol criteria 4.4A, as 79.29% of the property boundary is surrounded by a developed use.

**No Double Counting of Credits and No Net Harm (Section 5)**

*Criteria*

The City Forest Credits Standard describes safeguards and the “No Net Harm” Principle in Section 5. Project activities shall not cause net harm to the environment or urban communities. Project Operator must sign an Attestation of No Net Harm.

The City Forest Credits Standard describes prevention of double-counting in Section 5. Project Operator must sign an Attestation of No Double Counting of Credits. Per Section 5.2 of the Tree Preservation Protocol, the Project Operator must submit documentation showing no overlap of Project Area with any other registered urban forest carbon project. As part of Validation, the Registry shall use the appropriate tool on GIS software (such as the Intersect tool on ArcGIS) to independently investigate whether there is any overlap between the Project Area and other registered urban forest carbon projects.

*Issue Validated*

Project Operator has submitted a signed Attestation of No Double Counting and No Net Harm on April 29, 2024, and the Registry sees no evidence of net harm from this project. The Registry has analyzed geospatial data of the Project Area against that of all other registered urban forest carbon preservation projects to confirm that the Project Area for this project has not already received credits under the CFC standard.

**Additionality (Section 6)**

*Criteria*

The City Forest Credits Standard and Tree Preservation Protocol (Section 6) 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:

- Prior to the start of the project, the trees in the project area cannot be protected via easement or recorded encumbrance or in a protected zoning status that preserves the trees.
- The zoning in the project area must currently allow for a non-forest use.
- The trees in the project area face some risk of removal or conversion out of forest.

The Tree Preservation Protocol sets out three tests to determine whether the trees or forest in a project area face a threat or risk of tree removal or conversion out of a forested use, as described in Section 4.4. Taken together, these elements allow crediting only for unprotected trees, at risk of removal, which are then protected by a project action of preservation, providing additional avoided GHG emissions.

Additionality is embedded also in the quantification methodology. Projects cannot receive credits for trees that would have remained had development occurred, nor can they receive soil carbon credits for soil that would have been undisturbed had development occurred.

Project Operator must sign an Attestation of Additionality.

#### *Issue Validated*

Project Operator has demonstrated that prior to the start of the project the trees were not protected, the zoning allows for a non-forest use, and the trees are at risk of removal or conversion out of forest. Project Operator has followed the carbon quantification methodology to demonstrate how the number of credits to be issued. Project Operator signed the Attestation of Additionality on April 29, 2024.

### **Carbon Quantification (Section 11)**

#### *Criteria*

Project Operator must follow the carbon stock and soil carbon quantification methods outlined in Section 11 of the Protocol.

#### *Issue Validated*

Project Operator used the US Forest Service General Technical Report tables to determine accounting stock, per protocol criteria Section 11.1A. The tree canopy percentage was measured using i-Tree Canopy. Historical imagery was provided as supporting documentation to establish forest age and composition.

Per Protocol Section 11.2 B i. (Winton) and B ii. (Westmark), 79% of Accounting Stock is at risk of conversion.

- The Winton project area is zoned for residential use. Protocol Section 11.2.B allows the smaller of 90% or the rate of estimated clearing (calculated per Protocol Section 11.2.Bii) to be claimed as “Avoided Biomass Emissions.” Because the rate of estimated clearing under the residential zoning (which has a minimum lot size of 6,000 sq ft) was larger than 90%, 90% was claimed as “Avoided Biomass Emissions” for the Winton project area.

- The Westmark project area is zoned for residential use. However, unlike Winton, the rate of estimated clearing under the residential zoning (which has a minimum lot size of 3 acres) was less than 90%, the calculation resulting in 67.7% was claimed as “Avoided Biomass Emissions” for the Westmark project area.
- The weighted average between the two project areas resulted in using 79% “Avoided Biomass Emissions” overall.

Project Operator quantified the avoidance of emissions from soil carbon caused by conversion of soils to impervious surfaces under Protocol Section 11.3.

- The Winton project area is zoned for residential use. Per Protocol Section 11.3.B, because the ordinance specified minimum yard setbacks, which resulted in a more conservative value than the standard 50% allowance, the resulting 36% value for “Avoided Impervious Surface” was used
- The Westmark project area is zoned for residential use. Per Protocol Section 11.3.B, because the ordinance specified minimum yard setbacks, which resulted in a more conservative value than the standard 50% allowance, the resulting 35.17% value for “Avoided Impervious Surface” was used
- The weighted average between the two project areas resulted in using 36% “Avoided Impervious Surface” overall.

A deduction of 18.3% for displaced development was included in carbon quantification, per Protocol Section 11.4.

The Carbon Quantification Summary is as follows:

Project Area (acres)	<b>26.770</b>
Does carbon quantification use stratification (yes or no)	<b>No</b>
Percent tree canopy cover within Project Area	<b>100%</b>
Project stock (tCO <sub>2</sub> e)	<b>6,235</b>
Accounting Stock (tCO <sub>2</sub> e)	<b>4,988</b>
On-site avoided biomass emissions (tCO <sub>2</sub> e)	<b>3,939</b>
On-site avoided soil carbon emissions (tCO <sub>2</sub> e)	<b>1,141</b>
Deduction for displaced biomass emissions (tCO <sub>2</sub> e)	<b>721</b>
Deduction for displaced soil emissions (tCO <sub>2</sub> e)	<b>346</b>
Credits from avoided biomass emissions (tCO <sub>2</sub> e)	<b>3,218</b>
Credits from avoided soil emissions (tCO <sub>2</sub> e)	<b>795</b>
Total credits from avoided biomass and soil emissions (tCO <sub>2</sub> e)	<b>4,014</b>
Credits attributed to the project (tCO <sub>2</sub> e), excluding future growth	<b>4,014</b>
Contribution to Registry Reversal Pool Account	<b>401</b>
<b>Total credits to be issued to the Project Operator (tCO<sub>2</sub>e)</b> <i>(excluding future growth)</i>	<b>3,612</b>

### Co-Benefits Quantification (Section 11.5)

*Criteria*

Project Operator follows co-benefit quantification for rainfall interception, air quality, and energy savings, per protocol criteria Section 11.5.

*Issue Validated*

Project Operator has followed the co-benefits quantification method using the templates provided by City Forest Credits. Project Operator included 100% percent deciduous, and 0% percent coniferous for 26.77-acre Project Area. The following table documents the quantified ecosystem services in resource units and avoided costs.

<b>Ecosystem Services</b>	<b>Resource Units</b>	<b>Value</b>
Rainfall Interception (m3/yr)	7,241.5	\$51,848.25
Air Quality (t/yr)	0.3031	\$456.34
Cooling – Electricity (kWh/yr)	57,005	\$4,326.67
Heating – Natural Gas (kBtu/yr)	1,065,893	\$10,376.23
<b>Grand Total (\$/yr)</b>		<b>\$67,007.50</b>

**Monitoring and Reporting (Section 8)**

*Criteria*

Project Operator must report on tree conditions across the Project Area for the Project Duration. Reports must be submitted no less frequently than on the triennial anniversary of the date of the first Verification Report.

*Issue Validated*

Project Operator has agreed to submit written reports every three years using the template provided by City Forest Credits. Cardinal Land Conservancy staff will visit the project annually as part of their stewardship activities.

**Social Impacts (Section 12)**

*Criteria*

Project Operator shall use the Carbon Project Social Impact template to evaluate the SDGs to determine how a Project provides social impacts that contribute towards achievement of the global goals, as described in Section 12.

*Issue Validated*

Project Operator has submitted a completed Carbon Project Social Impact document. The project meets protocol criteria Section 12.

**VERIFICATION REPORT**

CFC reviewed the Verification Report to ensure it accurately reflects the documentation contained in the Project Design Document and supporting documents.



## VALIDATION CONCLUSION

All the information provided in this validation report is free of material misstatement, to the best of our knowledge. The project complies with the validation criteria outlined in the City Forest Credits Standard and Tree Preservation Protocol Version 12.40.

Approved by City Forest Credits on July 23<sup>rd</sup> in 2024.