

# Verification Report

## Eagle Creek Forest Legacy Initiative

City Forest Credits Project Number 052

October 21, 2024

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# 1 INTRODUCTION

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City Forest Credits engaged Todd Douglass (a Validation and Verification Body (VVB) acting as a third-party verifier) to verify the Eagle Creek Forest Legacy Initiative (Project), in the City of Indianapolis, Indiana for the reporting period of August 28, 2024 through August 27, 2027. The goal of the verification is to ensure that the GHG assertion is materially correct, and that the assertions made by the project are well documented.

## 1.1 PROJECT BACKGROUND

The Project will preserve 184.3 acres of non-contiguous forest across three separate parcels in Pike Township, in Indianapolis, Indiana. The three parcels are owned by the City of Indianapolis, and managed by the Department of Parks and Recreation. The parcels are part of the largest park in the City of Indianapolis, Eagle Creek Park, with a total acreage of 4,785 acres. The Project Area forest is situated in the southeast corner of the park to the east of Eagle Creek Reservoir. The forest area is bisected by I-495 from north to south, and bordered by I-65 to the east. The Project area is made up of five separate stands of predominately mixed upland hardwoods, differentiated by stand age and successional stage. The species makeup is dominated by maple, oak, and elm, with smaller percentages of ash, beech, cherry, hickory, and Virginia pine. The stands range in age from 25 to 85 years old. The Project area is being preserved in order to retain its valuable ecosystem services and to ensure that forested areas in the park will be sustainably managed into the future.

## 1.2 CONTACT INFORMATION

### Project Operator

City of Indianapolis, Department of Parks and Recreation  
200 E. Washington Street, Suite 2301  
Indianapolis, IN 46204

Contact:

Phyllis Boyd, Director, Phyllis.Boyd@Indy.gov,  
Andre Denman, Principal Park Planner, Andre.Denman@Indy.gov,  
Brenda Howard, DPW Office of Land Stewardship, Senior Ecologist, Brenda.Howard@Indy.gov

### Verification Body

Contact: Todd Douglass  
430 Lafayette Ave.  
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(860) 992-7556

### 1.3 OBJECTIVE

The goal of this GHG emission reduction verification is to ensure that the GHG assertion made by the Project is materially correct, that the assertions and assumptions used in the offset calculations are appropriate, that the offset calculations conform to the City Forest Credits (CFC) Protocol, and that the Project is in compliance with all CFC requirements relating to eligibility, accounting, and documentation.

## 2 VERIFICATION CRITERIA

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### 2.1 GENERAL

The Registry will accredit VVBs to act as third-party verifiers who meet the Registry's qualifications and complete training. Those accredited VVBs can then act to verify compliance with this Tree Preservation Protocol per International Standards Organization 14064-3. Specifically, the Registry adopts and utilizes the following standards from ISO 14064-3:

- Upon receiving a Project Design Document with data on eligibility, quantification of carbon and co-benefits, and a request for credits, the Registry will conduct a validation. If it validates the project at that stage, the Registry will retain a VVB to act as third-party verifier to verify compliance with this Protocol.
- The Registry requires a reasonable level of assurance in the accuracy the asserted GHG removals to a reasonable level.
- The verification items identified in the Tables 1 and 2 are all material elements, and any asserted GHG removals must be free of errors, misstatements, or omissions regarding those elements.
- The Registry will record, store, and track all quantification and verification data and either display it for public review or make it available for public review upon request.

### 2.2 PROTOCOL

The verification was conducted to the City Forest Credits Tree Preservation Protocol, version 12.100, February 22, 2023.

### 2.3 LEVEL OF ASSURANCE

This verification was conducted to a reasonable level of assurance. The Verification Report accurately reflects the documentation contained in the Project Design Document and supporting documents.

### 3 SCOPE OF VERIFICATION

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- The Project encompasses land in Pike Township, within the City of Indianapolis, in Marion County, Indiana specifically described in the Project Design Document. The Project area includes 184.3 non-contiguous acres across three parcels in Eagle Creek Park. (Parcels 6004923, 6004924, and 6004928)
- The Project Operator, the Indianapolis Department of Parks and Recreation, has managed the Project Area acreage as part of Eagle Creek Park. The City of Indianapolis has owned the park since 1966 when the land was conveyed from Purdue University in order to create a dam and reservoir. On August 28, 2024, the City of Indianapolis signed and recorded a Declaration of Development Restrictions covering the 184.3 acres of Project area within the park. The Declaration requires that the declarant, “shall not cut down, destroy, or remove trees located on the Property, except as required by law, as necessary to control or prevent hazard, disease or fire, or as needed to improve forest health.” The covenants of the Declaration are active for 100 years.
- The Project avoids emission of CO<sub>2</sub> from cutting trees by avoiding conversion of forest to non-forest land cover. This project does not claim to avoid conversion of forest soil to impervious surface.
- The Project duration is 100 years, beginning August 28, 2024. The Project Operator commits to protecting the trees within the Project Area and monitoring the project carbon stocks for the entire Project duration.
- The verification includes review of documents, data, imagery and other evidence provided by the Project Operator; independent checking of selected data; independent analysis of aerial imagery to confirm vegetation typing (and reviewing historical imagery to estimate stand ages); checking of calculations for accuracy and conformance with the Protocol.

### 4 VERIFICATION PROCESS

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#### 4.1 VERIFICATION ACTIVITIES

The verification process consisted of the following activities:

- Verifier checked all requirements in the Protocol (outlined in 4.2), confirmed that documentation satisfies the requirements of the Protocol, and that values extracted from the documents and conclusions drawn from the documents are accurate and appropriate
- Verifier independently checked mapping and calculated values in each stage of calculations
- Verifier reviewed the credit calculations. Verifier reviewed the Project Operator’s assertion that the Project results in GHG emissions mitigation of 9,455 tons CO<sub>2</sub>e.

- Verifier did not submit any requests for clarification or correction to the Project Operator.

## 4.2 CITY FOREST CREDITS TREE PRESERVATION PROTOCOL REQUIREMENTS

### 4.2.1 Eligibility

Verifier reviewed the Project against all CFC Tree Preservation Protocol requirements and confirmed the following:

- Project Operator Identity (Section 1.1): Verifier confirmed identity by reviewing the Indianapolis Department of Parks and Recreation website. Land ownership was verified upon review of Marion County tax parcel records.
- Project Documentation (Section 3): Verifier reviewed and confirmed Project Documentation including Project Design Document is complete and accurate.
- Project Implementation Agreement (Section 1.2): Verifier reviewed and confirmed fully executed Project Implementation Agreement on file. Agreement was signed by the Project Operator on August 1, 2024.
- Project Location (Section 1.3): Verifier reviewed mapping and location data. Verifier confirmed provided maps correspond with official parcel records and that the Project area is located within the boundary of the City of Indianapolis, satisfying Protocol requirement 1.3 B.
- Defining the Project Area (Section 1.4): Verifier confirmed the Project Area meets forest canopy cover requirements. Canopy cover on all parcel's Project area is over the 80% required by Protocol section 1.4 C., as verified with the i-Tree canopy tool, and aerial imagery.
- Land Ownership or Right to Receive Credits (Section 1.5): Verifier confirmed that there is a clear title to carbon credits and the Project Operator has legal authority to create and dispose of greenhouse gas offsets generated on the project lands.
- Demonstrating Preservation and Threat of Loss (Section 4):
  - Verifier confirmed that trees within the Project Area were not protected from removal prior to the Project. The entirety of the Project Area is located in the City of Indianapolis' PK-1 zoning district. This park district allows for the development of playgrounds and greenways and associated pedestrian access requirements including roads, paths, and parking lots.
  - Verifier confirmed that trees within the Project Area are now preserved from removal by a recorded Declaration of Development Restrictions.
  - The Project Operator has committed to meeting the permanence requirements.

- Prior to the Preservation Commitment action by the Project Operator there was threat of conversion of the project lands to non-forest cover. Threat of conversion was verified according to protocol section 4.4A. Verifier confirmed the Project area is bordered on greater than 30% of its perimeter by non-forest use, including roads and highways, and non-forest park developments.
- No Double Counting and No Net Harm (Section 5):
  - Verifier confirmed that Attestation of No Double Counting and No Net Harm is on file.
  - Verifier compared the Project geospatial data to the registered urban forest carbon preservation projects geospatial database using ArcGIS and determined upon manual inspection that no overlap of registered projects occurred.
- Monitoring and Reporting (Section 8): Verifier confirmed that Project Operator has a plan for monitoring and reporting over the Project Duration, and the plan is plausible and reasonable.

#### 4.2.2 Additionality

Verifier reviewed and confirmed that Project lands met the additionality requirements of the Protocol:

- Prior to the Project, lands were not protected from conversion by easement, zoning, or other legal mechanism. The Eagle Creek Project Area is located in Marion County's Environmentally Sensitive (ES) Areas overlay district. The overlay district specifies land-use guidance driven by the Marion County Land Use Plan Pattern book; a policy document, not a legal code. The Pattern Book, however, excludes specifications or guidance for large-scale parks of 10-acres or more.
- Zoning allows development including removal of existing trees. The development and permitting process for the PK-1 zoning district do not exclude the removal for forests and trees.
- The trees in the Project Area face some risk of removal or conversion out of forest, demonstrated by greater than the protocol threshold of 30% non-forest use perimeter. Risk of conversion is also noted in the historical record of non-forest land use change on Eagle Creek Park premises, including conversion to greenways, a golf course, a dog park, and non-park uses.
- Project Operator signed an Attestation of Additionality on July 9, 2024.

#### 4.2.3 Permanence

The Project Operator has committed to CFC that the Project Operator will protect the trees on the Project Area for 100 years. The Declaration of Development Restrictions protecting the Project Trees and lands remain in effect for a duration of 100 years.

#### 4.2.4 Accounting

The Project documents forest type, age and cover, and uses required factors in carbon stock and offset calculations according to Protocol method 11.1.A. This method involved the use of the afforestation table in Appendix B of the US Forest Service GTR NE-343 to determine estimated carbon stock as a factor of forest type and forest age.

The Project Operator accounted for stored carbon stock according to CFC Protocol Section 11.1.A. The forest composition of the Project Area was observed, documented and photographed by the Project Operator over a span of eight site visits between March and June of 2024. The Eagle Creek Forest is made up of five distinct stand types, varying in age and species composition. Stand 1, the largest stand at 140-acres, is a mid-successional mixed-hardwood stand dominated by maple, elm, and oak species, with a component of cherry, hickory, and large planted pin oaks. Stand density is estimated at 91 trees-per-acre with a basal area of 121 sqft. Stand 2 is a made up of two separate blocks covering 9.1 acres. Stand 2 is composed of mature uneven-aged forest of mostly maple, oak, and beech. The stand density is estimated at 145 trees-per-acre with 182 sqft of basal area. Stand 3 is a 17.3-acre block of mid-successional mixed-hardwoods dominated by planted pin oaks, with components of maple, elm, and catalpa. Stand density is estimated at 45 trees-per-acre with 94 sqft of basal area. Stand 4 is made up of two separate blocks covering 15.2-acres. Stand 2 is composed of a dense understory and young maple, tulip, and oak trees, amongst scattered large pin oak, cottonwood, and silver maple. The stand density is estimated at 47 trees-per-acre, with a basal area of 68 sqft. Stand 5 is the smallest stand at 2.7 acres and is composed of mostly Virginia pine, and mixed upland hardwoods. The stand density is estimated at 135 trees-per-acre with a basal area of 110 sqft. Stands 1, 2, and 4 were classified as northern prairie states maple-beech-birch forest type (GTR NE-343 Table B14, Page 113). Stand 3 was classified as northern prairie states oak-hickory forest type (GTR NE-343 Table B15, Page 114). Stand 5 was classified as northern prairie states oak-pine forest type (GTR NE-343 Table B16, Page 115). The verifier confirms that stand classifications are appropriate given provided composition descriptions and photographs, and is appropriate for the region.

The Project Operator estimated Stands 1 and 5 to be 45 years old due to presence of a forested canopy condition in aerial photography dating back to 1978. Stand 2 was estimated to be 85 years old due to presence of forested canopy condition in aerial photography dating back to 1941. Stand 3 was estimated to be 35 years old due to forested canopy present on aerial photography in 1985 and contiguous canopy closure present on 1990 imagery. Stand 4 was estimated to be 25 years old due to presence of closed forested canopy in aerial photography in 2000 and to reflect ash decline and drop out from the canopy. The verifier confirmed age to be appropriate and conservative for each stand given the closed canopy conditions present in historical imagery.

The Project Operator estimated the canopy cover over the Project area using the i-Tree Canopy tool, which produced an estimate of between 87-93% canopy coverage. The verifier confirmed this assessment to be accurate.

The Project Operator calculated avoided biomass emissions, and avoided soil carbon emissions, and accounted for deductions according to Protocol Section 11. Verifier confirmed that 90% of accounting stock could be counted as "Avoided Biomass Emissions" for Project area within the Eagle Creek Forest according to Protocol section 11.2 A. because it is located in a primarily non-residential zone. The Project Operator is not claiming avoided imperious surface credits for this project.

#### 4.2.5 Leakage

Offset accounting makes deductions for expected displacement of emissions following the requirements of the Protocol.



## 5 VERIFICATION FINDINGS

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The Project documents and data were reviewed, and the Verifier found that the emission reductions claimed are reasonable and in accordance with the Preservation Protocol. The Verifier makes no further recommendations.

## 6 VERIFICATION RESULTS AND CONCLUSION

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This verification of the Eagle Creek Forest Project for the reporting period August 28, 2024 through August 27, 2027, was completed in a manner consistent with ISO 14064-3 and in conformance with relevant CFC standards and guidelines. The table below is a summary of the emission reduction or removals.

**Table 1. Project GHG Removals**

Project Name	Issuance Year	GHG Reductions and Removals Attributed to the Project (mtCO <sub>2</sub> e)	Reversal Pool Account (10%) (mtCO <sub>2</sub> e)	Emission Reductions to be Issued to Project (mtCO <sub>2</sub> e)
Eagle Creek Forest	2024	2,850	285	2,565
Eagle Creek Forest	2025	2,850	285	2,565
Eagle Creek Forest	2026	2,850	285	2,565
Eagle Creek Forest	2027	1,955	195	1,760
Cumulative		10,505	1,051	9,455

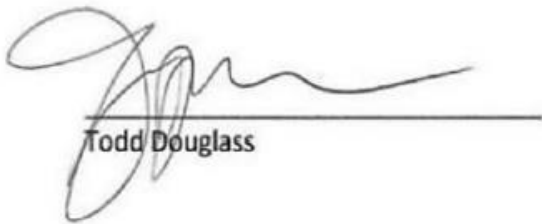
The Project Operator calculated ecosystem co-benefits using the CFC tool to determine dollar values of other ecosystem services provided by the forested project area. The verifier corroborated the CFC tool inputs and outputs to produce the values below. The verifier does not make an assessment of the plausibility of these values.

**Table 2. Ecosystem Co-Benefits Per Year**

<b><i>Ecosystem Services</i></b>	<b><i>Resource Units</i></b>	<b><i>Value</i></b>
Rainfall Interception (m <sup>3</sup> /yr)	39,953.6	\$65,445.86
Air Quality (t/yr)	1.1448	\$476.82
Cooling – Electricity (kWh/yr)	46,372	\$3,153.29
Heating – Natural Gas (kBtu/yr)	66,674	\$644.42
<b>Grand Total (\$/yr)</b>		<b>\$69,720.39</b>

Because the Project Area is greater than 50 acres, credits are issued over 4 years. See Table 1 above. Credit values are rounded to the whole number.

**Verifier Signature**



Todd Douglass