



Deschutes River Floodplain Restoration Planting Project Validation Report

Document Prepared by City Forest Credits

July 15, 2025

PROJECT OVERVIEW

<i>Project Name</i>	Deschutes River Floodplain Restoration Planting Project
<i>Project Registry Number</i>	62
<i>Project Type</i>	Afforestation/Reforestation
<i>City Forest Credits Protocol Version</i>	Version 12, February 29, 2024
<i>Project Start Date</i>	March 29, 2024
<i>Project Location</i>	Thurston County, WA
<i>Project Operator</i>	South Puget Sound Salmon Enhancement Group

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.

The Deschutes River Floodplain Restoration Planting Project includes a 12.94-acre Project Area on two separate, non-contiguous sites. Trees were planted 6 to 15 feet apart and the project utilizes the Area Reforestation quantification method. South Puget Sound Salmon Enhancement Group (SPSSEG) planted native trees adjacent to the river bank all the way to the valley wall or extent of the floodway. Both landowners, a land trust and private HOA, have agreed to transfer carbon credits rights to the SPSSEG as part of this carbon project.

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

South Puget Sound Salmon Enhancement Group (SPSSEG) is the Project Operator and provided their IRS determination letter to City Forest Credits to demonstrate that it is an entity organized and license under the laws of its jurisdiction.

Project Submittal Dates (Section 2)

Criteria

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. Project with plantings prior to May 1, 2017 are not eligible.

Issue Validated

Project Operator submitted the application on June 13, 2024, which was within six months of the date of planting the last project tree (March 29, 2024). City Forest Credits approved this application on June 13, 2024. City Forest Credits granted two deadline extensions for this project due to extenuating circumstances. This extension does not impact the quality of this carbon project.

Permanence – Project Duration and Reversals (Section 1.3, 2, 8)

A. Project Duration – Project Implementation Agreement (Section 1.3 and 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 26 years.

Issue Validated

SPSSEG and City Forest Credits signed a Project Implementation Agreement on September 18, 2024, for the Deschutes River Floodplain Restoration Planting Project (Project Registry Number 62). The project has a 26-year duration under City Forest Credits Afforestation and Reforestation Protocol Version 12.

B. Reversals (Section 8)

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. 85 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, Dan Hintz.

Project Location (Section 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.

Issue Validated

Both Project planting sites are within the planning boundaries of the Thurston Regional Planning Council, a regional metropolitan planning organization, in Thurston County, Washington, which meets protocol criteria Section 1.4D. The Project Operator has provided maps as supporting evidence, including regional-scale and project area maps.

Project Area (Section 1.5)

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 two planting sites over a 26-month period. The trees were planted between January 24, 2022, and March 29, 2024.

Ownership or Eligibility to Receive Potential Credits (Section 1.7)

Criteria

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

Issue Validated

Two private property owners are the landowner for the Deschutes River Floodplain Restoration Planting Project, meeting protocol criteria Section 1.7C. The Project Operator provided two Agreement to Transfer Credits documents that were recorded with Thurston County as supporting attachments.

Additionality (Section 4)

Criteria

The City Forest Credits Standard and Afforestation and Reforestation 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 (except for replacement trees planted in place of removed trees for specific reasons; Section 1.8);
- 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). If the latter, the Project Operator must submit local canopy change data to support its use;
- Project Operators must sign and comply with a Project Implementation Agreement with the Registry that requires a 26-year Project Duration;
- Project activities are not common practice.

The Project Operator must sign an Attestation of Additionality that attests to the above, as well as provides information on the impact of carbon revenues to project success.

Issue Validated

Project Operator has met the Legal Requirements Test in Section 1.8. Project Operator used the Registry's performance standard baseline in adherence with the WRI GHG Protocol, which is attached to the Project Design Document, and provided local canopy change data to support its use.

Based on local tree canopy cover change data, the Thurston Regional Planning Council boundary experienced a -0.20% canopy cover decline from 2011 to 2021. This decline supports the Performance Standard Baseline, and no credit adjustment was integrated into this project.

Project Operator signed a Project Implementation Agreement with the Registry for a 26-year Project Duration.

Project Operator has signed an Attestation of Additionality on September 16, 2024 that confirms the above, as well as stating how the project activities are not common practice, how the carbon revenues impact project success, that the 26-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 non-invasive trees within the prior 10 years.

No Double Counting and No Net Harm (Section 5)

Criteria

The City Forest Credits Standard describes prevention of double-counting in Section 5.1 and safeguards and the "No Net Harm" Principle in Section 5.2.

Project activities shall not cause net harm to the environment or urban communities. Project Operator must sign an Attestation of No Double Counting of Credits and No Net Harm. Per Section 5.2 of the Afforestation and Reforestation Protocol, the Project Operator must submit documentation showing no overlap of Project Trees with any other registered urban forest afforestation and reforestation project. As part of Validation, the Registry shall use the appropriate geospatial tool to independently investigate whether there is any overlap between the Project Trees and other registered urban forest carbon projects.

Issue Validated

Project Operator has submitted a signed Attestation of No Double Counting of Credits and No Net Harm on September 16, 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 afforestation and reforestation projects to confirm that the Project Area for this project has not already received credits under the CFC Standard.

Carbon Quantification (Section 10 and Appendix A)

Criteria

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

Issue Validated

Project Operator used the Area Reforestation planting design and quantification method, per Protocol criteria in Appendix A. Project Operator signed the Attestation of Planting, including attachments of invoices of trees purchased and planting photos. Project Operator provided two Attestation of Planting

Affirmations signed by Zaldivar’s Forestry Corporation on September 9, 2024, and the Center for Natural Lands Management on March 19, 2025.

The Carbon Quantification Summary is as follows:

Total number of trees planted	9,310
Project area (acres), if applicable	12.94
Total number of trees per acre, if applicable	719
Credits attributed to the project (tCO ₂ e)	1,692
Credits after mortality deduction (default is 20%)	NA for Area Reforestation
Contribution to Registry Reversal Pool Account (5%) (tCO ₂ e)	85
Total credits to be issued to the Project Operator (tCO₂e)	1,607
Total credits requested to be issued in Year 1 (10% of above)	161

GHG Assertion:

Project Operator asserts that the Project results in GHG emissions mitigation of 1,607 tons CO₂e over the 26-year Project Duration. Project Operator will provide tree survival and growth data, quantify tons CO₂e, and submit documentation for validation, verification, and credit issuance at Years 4, 6, 14, and 26, per the Afforestation and Reforestation Planting Protocol and Area Reforestation Tree Planting Design and Quantification Method. Per Protocol guidelines, 10% of the Project GHG emissions mitigation is issued after initial tree planting, or 161 tons CO₂e

The Project Operator submitted quantity and species information for all trees planted, as well as stand location information.

Co-Benefits Quantification (Section 10 and Appendix A)

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.

Ecosystem Services	Resource Units	Value
Rainfall Interception (m ³ /yr)	2,618.7	\$19,227
Air Quality (t/yr)	-0.2994	\$15
Energy: Cooling – Electricity (kWh/yr)	7,238	\$371
Energy: Heating – Natural Gas (kBtu/yr)	26,673	\$304
Grand Total (\$/yr)		\$19,916

Monitoring and Reporting (Section 7)

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, 14, and 26, 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.

Social Impacts (Section 11)

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 11.

Issue Validated

Project Operator has submitted a completed Carbon Project Social Impact document. The project meets protocol criteria Section 11.

VERIFICATION REPORT

CFC reviewed the Verification Report dated July 12, 2025 by Dan Hintz 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 Afforestation and Reforestation Protocol Version 12.

Approved by City Forest Credits on July 15, 2025.