

# **Verification Report**

## **Deschutes River Floodplain Restoration Projects**

City Forest Credits Project Number 062

July 12, 2025

Dan Hintz

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# 1 INTRODUCTION

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Dan Hintz (a Validation and Verification Body (VVB) acting as a third-party verifier) was engaged to verify the Deschutes River Floodplain Restoration Projects (Project) Thurston County, WA, for the period January 24, 2022 to March 29, 2024. 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 goals are to reconnect and reforest 12.94 acres of floodplain habitat surrounding the Deschutes River and its tributaries. South Puget Sound Salmon Enhancement Group (SPSSEG) planted native trees adjacent to the riverbank 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 SPSSEG as part of this carbon project.

The Site 1 planting restores 9.42 acres of riparian vegetation along the Deschutes River. Crews planted 7,650 trees and shrubs native to the site including bigleaf maple, willows, red alder, Oregon ash, and Garry oak, plus many shrub species important for wildlife forage. Within each planting circle, trees were planted approximately 15' from one another. The landownership is currently private, being owned by a land trust who is holding the protected property in perpetuity. Trees were installed from February 12 through March 29, 2024.

The Site 2 planting restores 3.52 acres of riparian buffer along Spurgeon Creek, a tributary to the Deschutes River. Crews planted 1,660 trees and shrubs native to the site including bigleaf maple, Douglas fir, willow and Western hemlock at a density of 471 plants per acre. The site was planted to shade Spurgeon Creek, provide forage and habitat for terrestrial wildlife, and as a resource for the local community. Species were installed in accordance with site conditions in order to maximize survival and foster a functional ecosystem. The landownership is currently private, being owned by a private HOA. Trees were installed from January 24 through February 2, 2022.

## 1.2 CONTACT INFORMATION

### Project Operator

South Puget Sound Salmon Enhancement Group  
6700 Martin Way East, Suite 112  
Olympia, WA 98516  
Contact: Cole Baldino, 360-464-0004, [coleb@spsseg.org](mailto:coleb@spsseg.org)

### Verifier

Dan Hintz  
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### 1.3 OBJECTIVE

The goal of this GHG emission removal 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 Afforestation and Reforestation 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 of the asserted GHG removals to a reasonable level.
- The verification items identified in 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 Afforestation and Reforestation Protocol, version 12, February 29, 2024.

### 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 is located in Thurston County, WA, specifically described in the Project Design Document.

- Period is January 24, 2022 to March 29, 2024.
- The verification includes review of documents, data, imagery, and other evidence provided by the Project Operator; independent checking of selected data; 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, confirmed that documentation satisfies the requirements of the Protocol, and that values extracted from the documents and conclusions drawn from the document are accurate and appropriate
- Verifier checked mapping for both project sites, photos of planting, attestations of planting, tree planting data spreadsheet, and invoices for plant purchases.
- Verifier reviewed the accuracy of the carbon quantification and City Forest Carbon Forward Removal Credit calculations. Verifier reviewed the Project Operator's assertion that the Project results in total GHG emissions mitigation of 1,692 tons CO<sub>2</sub>e over the 26-year Project Duration. Verifier reviewed the Project Operator's assertion that, per Protocol guidelines, 10% of the Project GHG emissions mitigation is issued after initial tree planting, or 161 tons CO<sub>2</sub>e.
- Verifier submitted to the Project Operator requests for clarifications on tree planting start and end dates, forest types, and concerns about emerald ash borer and Oregon ash trees planted as part of this project.

### 4.2 CITY FOREST CREDITS AFFORESTATION AND REFORESTATION PROTOCOL REQUIREMENTS

Verifier reviewed the Project against all CFC Afforestation and Reforestation Protocol requirements and confirmed the following:

- Project Operator Identity (Section 1.1): Verifier confirmed identity by reviewing Project Operator website and tax identification number.
- Project Design Document (Section 3): Verifier reviewed and confirmed Project Design Document is complete and accurate.
- Project Implementation Agreement (Section 1.3, 3, and 4): Verifier confirmed fully executed Project Implementation Agreement on file.

- Location (Section 1.4): Verifier reviewed mapping and location data and confirmed project locations are within the Thurston Regional Planning Council boundary. This meets criteria 1.4.D in the Afforestation and Reforestation Protocol, version 12.
- Land Ownership or Right to Receive Credits (Section 1.7): Verifier confirmed Agreement to Transfer Credits with Fox Hill HOA and Center for Natural Lands Management.
- Commencement (Section 2.4, 3): Verifier reviewed Approval of Application Letter. Verifier reviewed the Attestation of Planting and confirmed the date the last project tree was planted.
- Project Documentation (Section 3 and Appendix A): Verifier confirmed all required project documentation present.
- Additionality (Section 4): Verifier reviewed for additionality as follows:
  - Legal requirements test (Section 1.8) – no law or ordinance for Project Operator to plant trees (except for replacement trees planted in place of removed trees for specific reasons).
  - Performance Standards Baseline (CFC Standard, Section 4.9) – per the program wide performance standard baseline showing net tree loss, these trees are additional. The performance standard baseline is attached to the Project Design Document.
    - The Project Operator provided local canopy change data to support the use of the Performance Standard Baseline.
  - The Project did not plant trees on sites that were forested and then cleared of healthy, non-invasive trees (Section 1.9)
  - Project Operator signed a Project Implementation Agreement with City Forest Credits for 26 years.
  - The 26-year Project Duration commitment is additional to and longer than any commitment the Project Operator makes to non-carbon project tree plantings.
  - The Project activities are not common practice.
  - The carbon revenues will play a material role in project success.
  - Project Operator completed and signed the Attestation of Additionality (Section 4).
- Permanence (Section 1.3, 2.2, and 8): Verifier confirmed Project Implementation Agreement imposes a legal obligation to Project Operator to conduct this project for 26 years, including a reversal obligation.
- Quantification (Section 10 and Appendix A):
  - Verifier confirmed Project Operator utilized the Afforestation and Reforestation Protocol, version 12 (February 29, 2024) CFC quantification methodology described in Appendix A.
  - Verifier reviewed the accuracy of the data integrity in the quantification methodology.
  - Verifier reviewed spreadsheets with tree data, invoices for trees purchased, and geocoded photos for carbon quantification.

- Verifier reviewed the completed and signed Attestation of Planting and Attestation of Planting Affirmation.
- Co-Benefits (Appendix A): Verifier confirmed the calculation of ecosystem co-benefits as set forth in the City Forest Credits quantification tool.
- Attestation of No Double Counting of Credits and No Net Harm (Section 5)
  - Verifier reviewed the completed and signed Attestation of No Double Counting of Credits and No Net Harm.
  - Verifier compared the Project geospatial data to the registered urban forest carbon afforestation and reforestation projects geospatial database using Google Earth and determined no overlap was present.

## 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 Deschutes River Floodplain Restoration Projects for the period January 24, 2022 to March 29, 2024 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 verified GHG emissions removals for the Project for initial credit issuance. These City Forest Carbon Forward Removal Credits are ex-ante credits based on forecasted removals and subject to multiple safeguards, including sampling, and which convert to ex-post at Year 26.

**Table 1. Project GHG Removals**

Project Name	GHG Removals Attributed to the Project (mtCO <sub>2</sub> e)	GHG Removals After Deductions for Mortality (0%) (mtCO <sub>2</sub> e)	GHG Removals After Deductions for Reversal Pool Account (5%) (mtCO <sub>2</sub> e)	City Forest Carbon Forward Removal Credits to be Issued to Project (mtCO <sub>2</sub> e)
Deschutes River Floodplain Restoration Projects	1,692	1,692	1,607	161
Cumulative	1,692	1,692	1,607	

**Table 2. Ecosystem Co-Benefits Per Year After 25 Years**

<b><i>Ecosystem Services</i></b>	<b><i>Resource Units</i></b>	<b><i>Value</i></b>
Rainfall Interception (m3/yr)	2,618.7	\$19,227
Air Quality (t/yr)	-0.2994	\$15
Cooling – Electricity (kWh/yr)	7,238	\$371
Heating – Natural Gas (kBtu/yr)	26,673	\$304
<b>Grand Total (\$/yr)</b>		<b>\$19,916</b>

**Verifier Signature**



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**Daniel J Hintz**