

## **Verification Report**

### **Evergreen and East End Preservation Project, Richmond, VA**

CFC Project Number 006

February 25, 2020

Ecofor LLC

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Seattle, WA 98101

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# 1 INTRODUCTION

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City Forest Credits engaged Ecofor LLC (Ecofor) to verify the Evergreen and East End Preservation Project (Project), Richmond, VA, for the reporting period November 6, 2019 through February 25, 2020. 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 conserves forest on lands in cemeteries that are at risk of conversion to non-forest through clearing of trees to convert the cemetery areas to grass, while remaining in cemetery use. The Project Operator is the Enrichmond Foundation, and the owner of the Project lands is Parity LLC. The Project uses CFC's Tree Preservation Protocol. The Project Area is within the Evergreen and East End Cemeteries, in and adjacent to Richmond, VA. The cemeteries are historic, originally started in 1891. The cemeteries served the African American community and are the resting place of more than 34,000 people. The cemetery operators have lacked funds to maintain the grounds and have considered commercially logging the area to provide money to pay taxes and maintenance costs. Some of the cemetery area (outside of the Project Area) has been cleared of trees to reveal grave markers and provide the aesthetic experience of open parkland. The invasive species English Ivy (*Hedera helix*) occurs throughout the Project Area. Without active control, English Ivy can substantially prevent regeneration of new trees, strangle existing trees, and eventually result in conversion of forest to Ivy ground cover. The Project is intended to produce revenues to support maintenance of Project lands.

The project start date is November 6, 2019 and the project life is 40 years.

## 1.2 CONTACT INFORMATION

### Project Operator

Enrichmond Foundation

Mail: P.O. Box 25609

Richmond, VA 23260

Office: 1500 East Franklin St

Richmond, VA 23219

Contact: Jessica Maffey, Assistant Manager of Operations & TreeLab

### Verification Body

Ecofor LLC

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### 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 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 PROTOCOL

The verification was conducted to the City Forest Credits Tree Preservation Protocol – 40 years, version 7.40, June 1, 2019.

### 2.2 LEVEL OF ASSURANCE

This verification was conducted to a reasonable level of assurance.

## 3 SCOPE OF VERIFICATION

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- The Project encompasses a block of land that is partly within the city limits of Richmond VA, and partly adjacent to the city, and entirely within Henrico County, VA, known as the Evergreen and East End Cemeteries.
- On November 6, 2019, the landowner, Parity LLC, established a restrictive covenant on the lands that prevents cutting of trees except for controlling hazards, improving forest health, storm damage control, and invasive species control.
- The Project avoids emission of CO<sub>2</sub> from trees by avoiding conversion of forest to non-forest land cover. The project does not avoid conversion of forest to impervious surface because the conversion that is avoided is conversion to grassland, not buildings, roads, or other impervious surfaces. As a result, soil carbon stocks are assumed to remain essentially unchanged under the project, although soil carbon stocks may increase as the forest matures.
- Reporting Period is November 6, 2019 through February 25, 2020.

- 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); and 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:

- CFC and Ecofor jointly responded to questions from the Project Operator, regarding how to interpret the protocol, what constitutes appropriate documentation of protocol requirements, and how to calculate carbon stocks and carbon credits; CFC staff assisted the Project Operator in preparing the Project Document
- Ecofor provided the project an Excel spreadsheet for calculating credits and reviewed and commented on draft versions of the credit calculations
- Ecofor checked all requirements in the Protocol, and 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
- Ecofor independently checked selected data and checked calculation of values in each stage of credit quantification
- Ecofor independently sourced recent aerial imagery of the project to check claims of percent forest canopy cover; Ecofor used current and historic aerial imagery to estimate forest stand ages
- Ecofor submitted to CFC and the Project Operator requests for clarifications and corrections, as issues came to light, and reviewed revised and corrected documents and calculations

### 4.2 CFC TREE PRESERVATION PROTOCOL REQUIREMENTS

#### 4.2.1 Eligibility

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

- Trees within the Project Area were not protected from removal prior to the Project
- The Project Area meets forest canopy cover requirements
- 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
- The Project Operator has committed to meeting the permanence requirements of CFC

- Prior to the Preservation Commitment action by the Project Operator there was threat of conversion of the project lands to non-forest cover

#### 4.2.2 Additionality

Project lands met the requirements of the Protocol:

- Prior to the Project, lands were not protected from conversion by easement, zoning, or other legal mechanism
- Zoning allows removal of existing trees
- Ecofor independently checked the presence of developed uses around the perimeter of the legal property parcels containing the Project Lands and confirms that at least 50% of the perimeter is in non-forest developed uses, including substantially open grass cemetery areas and an industrial recycling facility; a creek in a separate legal property parcel abuts a portion of the western boundary of the parcels containing Project Lands and, for the calculation of development status of adjoining lands, Ecofor and CFC consider the creek parcel to be non-developable and consider the development status of the tracts adjoining the side of the creek parcel opposite the project parcels

#### 4.2.3 Permanence

The landowner has established and recorded a permanent covenant on the land protecting the Project Trees.

#### 4.2.4 Accounting

The Project documents forest type, age and cover, and uses required factors in carbon stock and offset calculations. The forest stand age used in the carbon calculations is conservative. At this time, the project is not claiming credits for ongoing forest growth.

#### 4.2.5 Leakage

This project is unusual in that it avoids conversion of forest to grass, instead of avoiding conversion of forest to buildings and related development. The existing land use of the Project Lands—cemetery—continues. As a result, there is no displacement of development to different locations. As a result, following the CFC Protocol, the Project does not cause leakage of carbon sequestration by displacing building to other locations.

## 5 VERIFICATION FINDINGS

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All issues raised by Ecofor were clarified or corrected by the Project Operator and CFC and all issues were closed.

There are issues that Ecofor recommends that CFC monitor in the future. The covenant protecting the trees on Project lands allows cutting and removal of trees for the purposes of controlling hazards,

improving forest health, storm damage control, and invasive species control. Monitoring should estimate the basal area of trees removed, and if average annual removal over a verification period is greater than 2% of the standing stock, more detailed monitoring may be required to quantify whether carbon stocks within the project area are decreasing.

Another issue to monitor is regeneration of new trees. Over time, new trees must be established to replace current trees, that will inevitably die. If invasive Ivy is not controlled, or if understory clearing substantially prevents tree regeneration, there may not be a sufficient supply of new trees to replace future tree mortality. Related to this, one of the interests that the public has in the Project lands is as a historic cemetery. There may be pressure to convert the area into parklike vegetation, with grass and easy access to graves. This understory clearing could reduce tree regeneration below the level required to maintain the forest canopy.

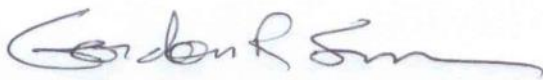
## 6 VERIFICATION RESULTS AND CONCLUSION

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This verification of the Evergreen and East End Preservation Project for the reporting period November 6, 2019 through February 25, 2020 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.

Tract	Vintage	GHG Reductions and Removals (mtCO <sub>2</sub> e)	Risk Buffer (mtCO <sub>2</sub> e)	Emission Reductions to be Issued to Project (mtCO <sub>2</sub> e)
Evergreen & East End	2019	4,612	461	4151
Evergreen & East End	2020	1,361	136	1,225
Evergreen & East End	Cumulative	5,973	597	5,376

**Lead Verifier Signature**



**Gordon Smith**