

# **Verification Report**

## **St. Elmo Preservation**

CFC Project Number 012

March 30, 2021

Ecofor LLC

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# 1 INTRODUCTION

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City Forest Credits engaged Ecofor LLC (Ecofor) to verify the project named “St. Elmo Preservation”, for the reporting period February 16, 2021 through February 15, 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 preserves forest on lands within the city boundary of Chattanooga, TN and prevents future conversion to non-forest cover. The project encompasses 44 contiguous legal property parcels located in the historic St. Elmo neighborhood on the south side of the city of Chattanooga. The Lookout Mountain Conservancy (LMC) acquired 40 of the parcels within the project on June 19, 2020 and acquired the remaining four parcels on February 8, 2021. The LMC established a conservation covenant on all 44 parcels on February 16, 2021.

The project start date, also known as the credit commencement date, is February 16, 2020. The project life is 40 years.

## 1.2 CONTACT INFORMATION

### Project Operator

Lookout Mountain Conservancy  
PO Box 76  
Lookout Mountain, TN, 37350  
Contact: Holly Odell, Community Engagement Coordinator

### Verification Body

Ecofor LLC  
16011 36<sup>th</sup> Ave NE  
Lake Forest Park, WA 98155

## 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 9.40, September 6, 2020.

### 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 58.1 acres across 44 property parcels within the city limit of Chattanooga, TN.
- On June 19, 2020 LMC acquired 40 of the parcels in the project, and acquired the remaining four parcels on February 8, 2021. The LMC established a conservation covenant on all 44 parcels on February 16, 2021. The parcels are listed in the Project Design Document.
- The Project avoids emission of CO<sub>2</sub> from trees by avoiding conversion of forest to non-forest land cover and avoids emission of CO<sub>2</sub> from soil resulting from the conversion of forest to impervious surface.
- Reporting Period is February 16, 2021 through February 15, 2024.
- 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 age); 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:

- Ecofor independently verified that the project area is within the Chattanooga city boundary.

- Ecofor independently verified that the project area is zoned R-1, which allows development with a minimum lot size of 7500 square feet.
- Ecofor reviewed the conservation covenant and confirmed that it prohibits tree removal except for limited removal of trees less than 2" in diameter for the purpose of building or maintaining unpaved trails.
- Ecofor obtained recent aerial imagery of the project area and verified that the area is essentially completely tree covered. Ecofor mapped the sample points the project used to calculate canopy coverage onto recent aerial imagery. Ecofor selected a subsample of points and classified vegetation and tree or non-tree, and checked the Project's classification of these points. If there are gaps in the upper tree canopy they are so small that shadow in the aerial imagery prevent discrimination as to whether the gaps are filled with smaller trees or with nontree cover. Even if all the potential gaps are actually gaps, canopy cover would be greater than 97%.
- Examination of historic aerial imagery from 1939 shows the property to be substantially tree covered at that time. Based on this, the carbon calculations using stand age 90 are conservative with respect to stand age.
- CFC provided the project an Excel spreadsheet for calculating credits. Ecofor reviewed inputs in the spreadsheet and they all appear to be correct. All calculations in the spreadsheet are correct.
- 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 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

The project area is entirely within the Pittsburgh, PA US Census Bureau Urban Area. Ecofor reviewed the Project against all CFC Tree Preservation Protocol requirements and confirmed the following:

- The Project Area is zoned to allow residential housing development and more than 30% of the project perimeter is in developed use.
- The Project Area currently is currently 97-100% tree canopy cover, which is greater than minimum required 80% tree canopy cover.
- Prior to the conservation covenant established by the project, trees within the Project Area were not protected from removal.
- There is a clear title to carbon credits through LMC's recorded ownership of the land 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.
- The project commencement date is after November 1, 2017.

#### 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.
- GIS quantification of the project area border length shows more than 30% of the perimeter is in developed uses.

#### 4.2.3 Permanence

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

#### 4.2.4 Accounting

Historical aerial imagery indicates that the project area had substantially complete tree cover in 1939. The imagery is lower resolution than current imagery and it is impossible to tell if the vegetation is approximately 70% tree cover with brush in between the trees, or complete tree coverage with variation in tree sizes. Even if the condition was scattered trees, those trees would have fully occupied the site by about 1960, and it is appropriate that the site be considered fully stocked. Ecofor did not independently verify the species mix of trees but the species mix reported by the project is consistent with the aerial imagery and with natural regeneration in the region.

#### 4.2.5 Leakage

The project follows the CFC protocol and accounts for displacement of development, both in loss of biomass and displacement of impervious surfaces to other locations. Deductions for this expected displacement of development are made to the carbon stocks on site when calculating credits for avoided emissions.

## 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.

Ecofor recommends that CFC continue to monitor tree cover across the project area.

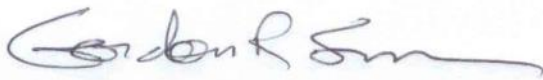
## 6 VERIFICATION RESULTS AND CONCLUSION

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This verification of the St. Elmo Preservation Project for the reporting period February 16, 2021 through February 15, 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 emission reduction or removals.

Tract	Issuance Year	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)
St. Elmo Preservation	2021	9,683	968	8,715
St. Elmo Preservation	2022	1,569	157	1,412
St. Elmo Preservation	Cumulative	11,252	1,125	10,127

**Lead Verifier Signature**



**Gordon Smith**