

## **Verification Report**

### **Harvey Manning Park Expansion Preservation Project**

CFC Project Number 015

December 14, 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 “Harvey Manning Park Expansion Preservation Project”, with the project operated by the city of Issaquah, Washington, for the reporting period December 6, 2021 through December 5, 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 the City of Issaquah, WA and prevents future conversion to non-forest cover. The project encompasses 15.14 acres within 33.53 acres in six legal property parcels within King County, WA. Project lands are within parcels:

2024069017

2924069009

2924069003

2924069008

2924069013

2924069004

In 2017 the owner of the property submitted a proposal to develop the lands, plus an adjacent parcel, into a 57 lot subdivision. Upon review by the City, the landowner received a “mitigated determination of non-significance” which is a key document showing that the project has adequately met environmental and zoning requirements. The landowner also received zoning variances needed to develop the property. These approvals allowed the landowner to begin clearing and grading the site, and installing utilities and building the access road.

The property was purchased by the Trust for Public Land to keep it from being developed, with the expectation that it would be purchased by a local government. The City of Issaquah approved purchase of the project lands 2018. King County purchased the other parcel in the proposed development. The City of Issaquah purchased the land parcels that encompass this project in 2019. While the intent was to preserve the lands as open space, the preservation commitment was not signed until December 6, 2021.

The preservation commitment prohibits tree cutting on the property, saying that the landowner “shall not cut down, destroy, or remove trees located on the Property, except as necessary to control or prevent hazard, disease or fire or to improve forest health.”

The project start date, also known as the credit commencement date, is December 6, 2021. The project life is 40 years.

## 1.2 CONTACT INFORMATION

### Project Operator

City of Issaquah  
301 Rainier Boulevard South  
P.O. Box 1307  
Issaquah, WA 98027  
Contact: Jennifer Fink

### 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 10.40, February 7, 2021 (CFC Protocol).

## 2.2 LEVEL OF ASSURANCE

This verification was conducted to a reasonable level of assurance.

# 3 SCOPE OF VERIFICATION

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The verification checks the attributes of the project against the requirements of the CFC Protocol. Verification includes checking public documents, such as checking public land records to verify ownership of the lands, location of lands relative to city or urban boundaries, zoning, and checking forest canopy conditions using publicly available aerial imagery. All inputs to credit calculations are checked for validity and appropriateness, and each step in the credit calculation is checked for accuracy. Where the verifier believes that different input values are more appropriate than the values proposed by the project, the verifier recommends values to CFC and provides evidence and reasoning for why the different input values

should be used. The verifier does not issue a verification until all issues are resolved, including correcting errors and gaps in information, choosing acceptable input values to credit calculations, and correctly performing credit calculations. The verification does not include conducting an independent forest inventory.

## 4 VERIFICATION PROCESS

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### 4.1 VERIFICATION ACTIVITIES

The verification process consisted of the following activities:

- Project documents were reviewed to assure that they meet the requirements of the CFCs Protocol.
- Specific terms of the CFC Protocol were checked against evidence provided by the project or evidence independently gathered by the verifier to assure that each requirement of the protocol is met.
- Land ownership and areas were checked using County land records.
- Developable area and approval for development was checked using county and court records approving initial phases of development.
- Forest cover was checked using recent, independent aerial imagery.
- Ecofor conducted a site visit on 3 December, 2021, and collected data on tree canopy cover type along transects through the project area, observed forest health and forest type, looked for signs of encroachment, and measured trees on plots for estimating biomass carbon stock.
- CFC provided the project an Excel spreadsheet for calculating credits. Ecofor worked with CFC to make correct calculations of credits using data from development plans and the site visit.
- 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:

- Ecofor consulted City of Issaquah maps and determined that the project lands are located within the city limits of the City of Issaquah, meeting the project location requirement in Section 1.3 of the CFC Protocol.
- The project area is defined and boundaries are clearly specified in ways that meet the requirements of Section 1.4 of the CFC Protocol.
- The Project Area currently is currently between 88-100% tree canopy cover, which is greater than minimum required 80% tree canopy cover required by Section 1.4 of the CFC Protocol.

- County records show that the project proponent, the City of Issaquah, owns the project lands and thus is eligible to create and receive CFC credits under the requirements of Section 1.5 of the CFC Protocol.
- The Project Operator submitted an application to create the project with the CFC prior to executing the legal instrument that protects the trees on the project lands.
- Protection of the forest is permanent, which is longer than the 40 years required by Section 2 of the CFC Protocol.
- Reporting Period is December 6, 2021 through December 5, 2024.
- Ecofor independently verified that the project area located in zones SF-S and SF-E which allow residential development with 4.5 and 1.24 dwelling units per acre, respectively.
- Areas with the legal parcel boundaries that are within stream buffers, steep slopes, or other critical areas where clearing is not allowed are excluded from the Project Area.
- 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 the Project Operator's (City of Issaquah) 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.

#### 4.2.2 Additionality

Project lands met the requirements of the Protocol:

- The project lands legally could have been developed into housing units with associated yards, streets and utilities, meeting CFC Protocol Section 4.3.A, and within three years of the project start date the land was sold to the City at a price of approximately \$300,000 per acre, demonstrating value for development and well above the threshold value of \$10,000 per acre, thus meeting the requirement of Section 4.3.C showing value for development.
- The Preservation Commitment date is after November 1, 2017, meeting the requirement of Section 5 of the CFC Protocol.
- Prior to the Project, trees on the land were not protected from removal by easement, zoning, or other legal mechanism.

#### 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 quantifies the amount of carbon stored within the Project Area using US Forest Service afforestation tables permitted under Section 10.1.A of the CFC Protocol.

- The project obtained historic aerial photos from 1936 and 1946 showing over 90% tree canopy cover within the project area. There are some tree canopy gaps within the land parcel boundaries, in areas that are now classified as "critical areas" and excluded from the Project Area. Shadows on the northeast edge of the project area show that trees within the project area were tall enough

to have substantial shadows, but no information is available to all calculation of the sun angle and estimation to tree heights. The oblique angle of the 1946 photo allows comparison of the tree height to road widths and suggests that the typical tree height is greater than 50 feet. Based on these pieces of data, Ecofor judges the Project Operator's assertion of a 1916 stand origination date to be reasonable.

- Ecofor obtained recent aerial imagery of the project area and verified that the area is essentially completely tree covered. Overstory tree gaps observed during the site visit were mostly smaller than one tree canopy width across.
- During the site visit, Ecofor observed overstory tree canopy cover at 102 points along transects through the project area and the tree cover was 11% conifer and 89% deciduous. The fraction conifer is high in gullies and along creeks, in parts of the land parcel area that are excluded from the project because they are classified as "critical areas" where land clearing is not allowed. The main conifer tree species are Douglas-fir and Western Red Cedar. The dominant deciduous tree species is Bigleaf Maple. Red Cedar growing in the understory shows species succession, further supporting estimates of the stand age being greater than 90 years. The species in photos support the selection of tables B21 and B22 for calculation of forest carbon stock. The weighted average of deciduous and conifer tree cover is used to weight the different carbon stocks from the tables for Alder-Maple and Douglas-fir, based on the ratio observed during the site visit.
- The area subject to clearing is from the approved site development plan.
- The area of potential impervious area is calculated from the allowed impervious area specified for each lot in the development plans, plus the areas that were to be converted to roads and utilities.

#### 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, to ensure that as the Bigleaf Maple in the site die of old age the forest type converts to shade tolerant species such as Western Red Cedar instead of converting to brush.

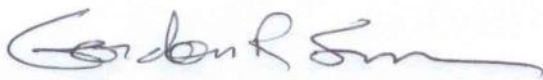
## 6 VERIFICATION RESULTS AND CONCLUSION

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This verification of the Harvey Manning Park Expansion Preservation Project by the City of Issaquah for the reporting period December 6, 2021 through December 5, 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.

Project	Issuance Year	GHG Reductions and Removals (tCO <sub>2</sub> e)	Risk Buffer (tCO <sub>2</sub> e)	Emission Reductions to be Issued to Project (tCO <sub>2</sub> e)
Harvey Manning Park	2021	7,121	712	6,409
Harvey Manning Park	Cumulative	7,121	712	6,409

**Lead Verifier Signature**



**Gordon Smith**