



# **Kenney and Clay Woods Additions to the Lind-McGeachie Preserve Preservation Project Validation Report**

Document Prepared by City Forest Credits

February 8, 2024

## PROJECT OVERVIEW

<i>Project Name</i>	Kenney and Clay Woods Additions to the Lind-McGeachie Preserve Preservation Project
<i>Project Registry Number</i>	045
<i>Project Type</i>	Tree Preservation
<i>City Forest Credits Protocol Version</i>	Version 12.40, February 22, 2023
<i>Project Start Date</i>	December 7, 2023
<i>Project Location</i>	Rockford Township, Illinois
<i>Project Operator</i>	Natural Land Institute

## SUMMARY

*Provide a few sentences about the overall project*

The Kenney and Clay Woods Additions to the Lind-McGeachie Preserve Preservation Project (the Project) are a 47.67-acre wooded Project Area on two parcels whose addition expands a larger complex of protected lands. Natural Land Institute (NLI) is seeking to preserve the forest, creating substantial conservation and community benefits in the face of a continued threat of urban expansion from the City of Rockford.

## 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*

Natural Land Institute (NLI) is the Project Operator. To document that it is an entity organized and license under the laws of its jurisdiction, NLI provided their 2022 990 tax form to City Forest Credits.

### **Project Submittal Dates (Section 2.1, 2.3)**

#### *Criteria*

Project must submit applications to the Registry within two years of the date of the Preservation Commitment. The Preservation Commitment must be recorded no later than 6 months after Registry Approval of the Project Application. Projects whose Preservation Commitment dates from prior to November 1, 2017 are not eligible.

#### *Issue Validated*

Project Operator submitted the application on May 31, 2023. The Preservation Commitment recordation date was December 7, 2023. This date is later than the six months provided under Protocol criteria Sections 2.1 and 2.3; the delay was caused by the longer period required to complete the acquisition process for one of the parcels included in the Project. However, the Project Operator had notified the Registry of potential delays prior to the deadline, and received official approval on November 2, 2023 for a deadline extension until December 15, 2023. All project documents were submitted by December 15, 2023.

## **Permanence – Project Duration and Reversals**

### **A. Project Duration (Section 1.2 and 2.2)**

#### *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 40 years.

#### *Issue Validated*

The Natural Land Institute and City Forest Credits signed a Project Implementation Agreement on August 17, 2023 for the Kenney and Clay Woods Additions to the Lind-McGeachie Preserve Preservation Project (Project Registry Number 45). The project has a 40-year duration under City Forest Credits Tree Preservation Protocol Version 12.40.

### **B. Reversals (Section 9)**

#### *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 10% of all credits issued to preservation 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 10% deduction for the Reversal Pool of credits. 428 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, Zachary Boerman.

### **Project Location (Section 1.3 and 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 with geospatial location.

#### *Issue Validated*

The Project is located in in Rockford Township, unincorporated City of Rockford, and is within the boundaries of the Region 1 Planning Commission (R1PC) for Rockford, Illinois, which meets protocol

criteria Section 1.3 D. The Project Operator has provided maps as supporting evidence, including geospatial location, regional-scale, and project area maps.

The 47.67-acre Project Area includes portions of contiguous parcel numbers: 15-20-126-016 and 15-19-253-003.

The Project Area is in a location that receives more than 20 inches of precipitation per year and has more than 80% tree canopy, meeting protocol criteria Section 1.4 C. The Project Operator has provided an iTree report to demonstrate the percentage of canopy cover for the Project Area, which was determined to be 90%.

### **Ownership or Eligibility to Receive Potential Credits (Section 1.5)**

#### *Criteria*

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

#### *Issue Validated*

Natural Land Institute is the landowner for the Kenney and Clay Parcels, meeting protocol criteria Section 1.5 A. The Project Operator provided a recorded deed, recorded December 7, 2023, as supporting documentation.

### **Tree Preservation Commitment (Section 4.1)**

#### *Criteria*

Project Operator must demonstrate that trees in the Project Area are preserved for at least 40 years.

#### *Issue Validated*

Project Operator signed and recorded a deed restriction, declaring development restrictions and the protection of the trees, on December 7, 2023.

Under the Recitals section:

Specific language in paragraph 1 of the recorded deed restriction titled Declaration of Development Restrictions states: Removal of Trees. Declarant 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, recreational non-motor-use trails have negligible or de minimis impacts on biomass and carbon stock and are permissible.

The deed restriction will ensure effective protection for the Project Area for 40 years, which satisfied protocol criterial Section 4.1.

### **Demonstration of Threat of Loss (Section 4.2, 4.3, 4.4)**

#### *Criteria*

Project Operator must demonstrate that prior to the Preservation Commitment, the project trees were not preserved from removal. The Project Area must be in a land use designation that allows for at least

one non-forest use and is not in an overlay zone that prohibits all development. The Project Area must also meet one of three conditions that demonstrate threat of loss as described in Section 4.4 A, B, or C such as surrounding developed or improved uses, per acre value, or fair market value.

*Issue Validated*

The Project Operator signed an Attestation of Additionality on October 25, 2023, stating that prior to the start of the Project, the trees in the Project Area were not protected by easement, recorded encumbrance, or protected zoning status.

The Project parcel is zoned for at least one non-forest use. All parcels are zoned Agricultural Priority (AG).

The Project meets Tree Preservation Protocol Criteria 4.4A, as 100% of the perimeter is adjacent to a developed use. The Project Operator provided a map showing the developed uses around the Project Area perimeter as supporting documentation.

**No Double Counting of Credits and No Net Harm (Section 5)**

*Criteria*

The City Forest Credits Standard describes safeguards and the “No Net Harm” Principle in Section 5. Project activities shall not cause net harm to the environment or urban communities. Project Operator must sign an Attestation of No Net Harm.

The City Forest Credits Standard describes prevention of double-counting in Section 5. Project Operator must sign an Attestation of No Double Counting of Credits. Per Section 5.2 of the Tree Preservation Protocol, the Project Operator must submit documentation showing no overlap of Project Area with any other registered urban forest carbon project. As part of Validation, the Registry shall use the appropriate tool on GIS software (such as the Intersect tool on ArcGIS) to independently investigate whether there is any overlap between the Project Area and other registered urban forest carbon projects.

*Issue Validated*

Project Operator has submitted a signed Attestation of No Double Counting and No Net Harm on October 2, 2023, 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 preservation projects to confirm that the Project Area for this project has not already received credits under the CFC standard.

**Additionality (Section 6)**

*Criteria*

The City Forest Credits Standard and Tree Preservation Protocol (Section 6) 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:

- Prior to the start of the project, the trees in the project area cannot be protected via easement or recorded encumbrance or in a protected zoning status that preserves the trees.
- The zoning in the project area must currently allow for a non-forest use.
- The trees in the project area face some risk of removal or conversion out of forest.

The Tree Preservation Protocol sets out three tests to determine whether the trees or forest in a project area face a threat or risk of tree removal or conversion out of a forested use, as described in Section 4.4. Taken together, these elements allow crediting only for unprotected trees, at risk of removal, which are then protected by a project action of preservation, providing additional avoided GHG emissions.

Additionality is embedded also in the quantification methodology. Projects cannot receive credits for trees that would have remained had development occurred, nor can they receive soil carbon credits for soil that would have been undisturbed had development occurred.

Project Operator must sign an Attestation of Additionality.

*Issue Validated*

Project Operator has demonstrated that prior to the start of the project the trees were not protected, the zoning allows for a non-forest use, and the trees are at risk of removal or conversion out of forest. Project Operator has followed the carbon quantification methodology to demonstrate how the number of credits to be issued. Project Operator signed the Attestation of Additionality on October 25, 2023.

**Carbon Quantification (Section 11)**

*Criteria*

Project Operator must follow the carbon stock and soil carbon quantification methods outlined in Section 11 of the Protocol.

*Issue Validated*

Project Operator engaged an independent consultant, Davey Resource Group (DRG), to perform an on-site assessment of the carbon stock, per protocol criteria Section 11.1.B. DRG conducted a plot-sample forest assessment adhering to the standards set in CFC Tree Preservation Protocol Section 11.1.B. DRG established 45 sample plots sized at 1/10th-acre. Within every plot, each live tree was inventoried that was at least 5” in diameter at 4.5’ above ground, where the height above ground is measured on the uphill side of the tree. The plot data were used as input for iTree Eco to quantify the carbon biomass across the entire Project Area. The tree canopy percentage was measured using i-Tree Canopy. Historical imagery was provided as supporting documentation to establish forest age and composition.

Forest composition from the plot-sample inventory was provided as supporting documentation, but forest age was not necessary for carbon quantification for this project.

The Accounting Stock at risk of conversion was calculated per Protocol Section 11.2.A, with the number of acres that could be cleared determined by the relevant zoning regulations for agricultural areas. The total potentially cleared acres across the Project Area is 90%.

Project Operator quantified the avoidance of emissions from soil carbon caused by conversion of soils to impervious surfaces under Protocol Section 11.3, which allows for 60% of the Project Area in an

agricultural zone to be eligible for conversion. However, the 10.2 acres within the wetland are not eligible for development and the soil carbon credits have been removed for this section of the project.

A deduction of 18.3% for displaced development was included in carbon quantification, per Protocol Section 11.4.

The Carbon Quantification Summary is as follows:

Project Area (acres)	<b>47.67</b>
Does carbon quantification use stratification (yes or no)	<b>No</b>
Percent tree canopy cover within Project Area	<b>90%</b>
Accounting Stock (tCO <sub>2</sub> e)	<b>3,267</b>
On-site avoided biomass emissions (tCO <sub>2</sub> e)	<b>2,940</b>
On-site avoided soil carbon emissions (tCO <sub>2</sub> e)	<b>2,698</b>
Deduction for displaced biomass emissions (tCO <sub>2</sub> e)	<b>538</b>
Deduction for displaced soil emissions (tCO <sub>2</sub> e)	<b>817</b>
Credits from avoided biomass emissions (tCO <sub>2</sub> e)	<b>2,402</b>
Credits from avoided soil emissions (tCO <sub>2</sub> e)	<b>1,880</b>
Total credits from avoided biomass and soil emissions (tCO <sub>2</sub> e)	<b>4,282</b>
Credits attributed to the project (tCO <sub>2</sub> e), excluding future growth	<b>4,282</b>
Contribution to Registry Reversal Pool Account	<b>428</b>
<b>Total credits to be issued to the Project Operator (tCO<sub>2</sub>e)</b> <i>(excluding future growth)</i>	<b>3,854</b>

**GHG Assertion:**

Project Operator asserts that the Project results in GHG emissions mitigation of 3,854 tons CO<sub>2</sub>e.

**Co-Benefits Quantification (Section 11.5)**

*Criteria*

Project Operator follows co-benefit quantification for rainfall interception, air quality, and energy savings, per protocol criteria Section 11.5.

*Issue Validated*

Project Operator has followed the co-benefits quantification method using the templates provided by City Forest Credits. Project Operator included 90 percent deciduous, 0 percent coniferous, and 10 percent non-tree for 47.67 acre Project Area. The following table documents the quantified ecosystem services in resource units and avoided costs.

<b><i>Ecosystem Services</i></b>	<b><i>Resource Units</i></b>	<b><i>Value</i></b>
Rainfall Interception (m <sup>3</sup> /yr)	11,604.9	\$83,088.91
Air Quality (t/yr)	0.4857	\$731.31
Cooling – Electricity (kWh/yr)	91,353	\$6,933.67
Heating – Natural Gas (kBtu/yr)	1,708,137	\$16,628.33
<b>Grand Total (\$/yr)</b>		<b>\$107,382.21</b>

## **Monitoring and Reporting (Section 8)**

### *Criteria*

Project Operator must report on tree conditions across the Project Area for the Project Duration. Reports must be submitted no less frequently than on the triennial anniversary of the date of the first Verification Report.

### *Issue Validated*

NLI will submit written monitoring reports every three years attesting to the accuracy of the reports. The reports will include imagery of leaf-on trees. NLI will monitor for tree canopy loss and follow Protocol requirements as necessary.

## **Social Impacts (Section 12)**

### *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 12.

### *Issue Validated*

Project Operator has submitted a completed Carbon Project Social Impact document. The project meets protocol criteria Section 12.

## **VERIFICATION REPORT**

CFC reviewed the Verification Report dated February 8, 2024 to ensure it accurately reflects the documentation contained in the Project Design Document and supporting documents.

## **VALIDATION CONCLUSION**

All the information provided in this validation report is free of material misstatement, to the best of our knowledge. The project complies with the validation criteria outlined in the City Forest Credits Standard and Tree Preservation Protocol Version 12.40.

Approved by City Forest Credits on February 8 in 2024.