



# **City of Atlanta Carbon Credit Program (2024) Validation Report**

Document Prepared by City Forest Credits

December 17, 2025

## PROJECT OVERVIEW

<i>Project Name</i>	City of Atlanta Carbon Credit Program (2024)
<i>Project Registry Number</i>	063
<i>Project Type</i>	Tree Preservation
<i>City Forest Credits Protocol Version</i>	Version 13, February 29, 2024
<i>Project Start Date</i>	September 30, 2025
<i>Project Location</i>	Atlanta, GA
<i>Project Operator</i>	City of Atlanta

## SUMMARY

*Provide a few sentences about the overall project*

The City of Atlanta aims to expand its Carbon Credit Program to include four newly acquired properties under the City Forest Credits (CFC) 40-year urban tree preservation protocol. The City has demonstrated its commitment to sustainability, climate resilience, and protected urban forests through the successful implementation of the Lake Charlotte Nature Preserve Carbon Credit Program. Building upon this success, the City seeks to expand its Carbon Credit Program to include four additional newly City-acquired properties: Southwest Nature Preserve, Utoy Creek Nature Preserve, Mount Zion Nature Preserve, and South River Nature Preserve. Together, these properties represent a combined portfolio of approximately 252 acres of forested land, offering significant potential to generate additional carbon credits under the validated City Forest Credits 40-year urban tree preservation protocol. The Project Area will protect up to 146.24 acres of rare, urban, and ecologically significant forested land.

## 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*

The City of Atlanta (the “City”) is the Project Operator. The City is a governmental body.

### **Project Submittal Dates (Section 2.1, 2.3, 6)**

#### *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.

If the landowner is a land trust or other entity with a conservation mission, the Project lands must have been acquired within two years of the date of the application.

*Issue Validated*

Project Operator submitted the application on December 19, 2024 and the application was approved on January 16, 2025. The Preservation Commitment effective date is September 30, 2025. City Forest Credits granted a project extension for all documents to be due September 30, 2025. Thus with the project extension, the Preservation Commitment effective date is September 30, 2025.

The latest Project property was acquired on December 19, 2022, which is within two years of the application date.

**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 City of Atlanta and City Forest Credits signed a Project Implementation Agreement on June 3, 2025 for the City of Atlanta Carbon Credit Program (2024) (Project Registry Number 063). The project has a 40-year duration under City Forest Credits Tree Preservation Protocol Version 13.40.

**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. 2,278 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, Todd Douglass.

**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 1.3 A to D, or within criterion E. 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 the City of Atlanta, which meets protocol criteria Section 1.3 B. The Project Operator has provided maps as supporting evidence, including geospatial location, regional-scale, and project area maps.

The 146.24 acre Project Area includes portions of contiguous parcel numbers:

Site	Parcel Number	Land Use Designation	Parcel Acreage	Project Area Acreage (before removing floating areas)
Southwest Nature Preserve	14F-0041-LL-047-8	R-3	60.0	18.6
	14F-0035-LL-071-6	PD-H	115.1	81.3
	14F-0034-LL-036-0	R-3	3.4	1.1
Utoy Creek Nature Preserve	14F-0027-LL062	RG-2-C	28.5	20.3
Mount Zion Nature Preserve	14-0062-LL0833	R-4	35.6	25.0
	14-0062-LL0544	R-4	2.1	1.6
South River Nature Preserve	14-0069-LL0596	PD-H	8.3	6.2
	14-0069-LL0646	PD-H	1.8	1.2
	14-007000040275	R-4	1.6	1.6

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.

**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*

The City of Atlanta is the landowner for the City of Atlanta Carbon Credit Program (2024), meeting protocol criteria Section 1.5 A. The Project Operator provided property deeds 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*

To meet the criteria needed in the CFC Preservation Protocol, the Project Operator recorded in the public land records a Declaration of Development Restrictions, specifically protecting the trees in perpetuity. The deed restriction language includes “Declarant intends by this Declaration to preserve the trees on the Property for a period of no less than 40 years. It understands that for so long as the Agreement is in effect, this Declaration will bar the clearing or removing of trees for parking lots, picnic shelters, playfields, visitor centers, or any reason other than forest health, hazard, disease, fire, and small, non-motorized recreational trails.” The project meets protocol criteria 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 excludes relevant critical areas. 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 September 10, 2025 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.

There are nine parcels within the Project Area, across four nature preserves, as follows:

- Southwest Nature Preserve - three parcels, two of which are zoned single-family residential (district R-3), and one parcel that is zoned planned development (district PD-H).
- Utoy Creek Nature Preserve, one parcel which is zoned residential general multi-family residential, with conditions (district RG-2-C).
- Mount Zion Nature Preserve, two parcels, both of which are zoned single-family residential (district R-4).
- South River Nature Preserve, two of which are zoned planned development (district PD-H), and one which is zoned single-family residential (district R-4).

The project meets both 4.4 A and 4.4 B requirements in the CFC Preservation Protocol.

#### 4.4 A:

- Southwest Nature Preserve’s total property perimeter is 72% developed with developments including a corner store, a golf course, a railroad, and single-family housing.
- Mount Zion Nature Preserve’s total property perimeter is 96% developed with developments including single family housing and multi-family housing.
- Utoy Creek Nature Preserve’s total property perimeter is 39% developed with developments including single family housing, commercial properties, medical buildings, and multi-family housing.

- South River Nature Preserve’s total property perimeter is 38% developed with developments including an interstate highway, single family housing, and an elementary school.

4.4B:

- Total cost per acre of Mount Zion Nature Preserve and South River Nature Preserve was \$35,955.28.
- The total cost per acre of Utoy Creek Nature Preserve was \$16,031.96.

## **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 September 10, 2025, 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 Preservation Commitment, the trees in the project area cannot be protected via easement or recorded encumbrance or in a protected zoning status that preserves the trees.
- Prior to the Preservation Commitment, the zoning in the project area allowed for a non-forest use.
- Prior to the Preservation Commitment, the trees in the project area passed one of three tests to show risk of removal or conversion out of forest.

- Project activities are not common practice, demonstrated either through the current version of the Registry's Activity Penetration Analysis – Demonstration of Additionality of Urban Forest Conservation Project Activities.

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 that attests to the above, as well as provides information on the impact of carbon revenues to project success.

#### *Issue Validated*

Project Operator has demonstrated that prior to the Preservation Commitment, the trees were not protected, the zoning allowed for a non-forest use, and the trees were 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 September 10, 2025.

### **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 used the US Forest Service General Technical Report tables to determine accounting stock, per protocol criteria Section 11.1 A. The tree canopy percentage was measured using i-Tree Canopy.

Historical imagery was provided as supporting documentation to establish forest age and composition.

Per Protocol Section 11.2A, a weighted average of 83% of the Accounting Stock is at risk of conversion. The chart below describes the nature preserve location, acreage under each zoning type, and percentage of that specific acreage that is risk of being lost if the site is developed.

SiteName	Name	FEMA Floodplain (10% at risk)	Zoned R-3 (90% at risk)	Zoned R-4 (90% at risk)	Zoned PD-H (90% at risk)	Zoned RG-2-C (49.5% at risk)	PROJECT AREA
Mount Zion	MZ1			2.1			2.1
Mount Zion	MZ2	3.5		21.0			24.5
South River	SR1	0.5			0.4		0.9

South River	<b>SR2</b>	0.5			1.0		1.5
South River	<b>SR3</b>				4.7		4.7
South River	<b>SR4</b>			1.5	0.4		1.9
Southwest	<b>SW1</b>		8.4	1.6	57.9		67.9
Southwest	<b>SW2</b>		9.6		23.5		33.1
Utoy	<b>UC1</b>	0.4					0.4
Utoy	<b>UC2A</b>	0.5				12.5	13.0
Utoy	<b>UC2B</b>	0.9				6.0	6.9

Project Operator quantified the avoidance of emissions from soil carbon caused by conversion of soils to impervious surfaces under Protocol Section 11.3. The chart below describes the nature preserve location, acreage under each zoning type, and percentage of that specific acreage that is allowed to be developed with impervious surfaces.

		<b>Zoned R-3 (40% Avoided Impervious)</b>	<b>Zoned R-4 (50% Avoided Impervious)</b>	<b>Zoned PD-H (50% Avoided Impervious)</b>	<b>Zoned RG-2-C (50% Avoided Impervious)</b>	<b>PROJECT AREA</b>
SiteName	Name					
Mount Zion	<b>MZ1</b>		2.1			2.1
Mount Zion	<b>MZ2</b>		24.5			24.5
South River	<b>SR1</b>			0.9		0.9
South River	<b>SR2</b>			1.5		1.5
South River	<b>SR3</b>			4.7		4.7
South River	<b>SR4</b>		1.5	0.4		1.9
Southwest	<b>SW1</b>	8.4	1.6	57.9		67.9
Southwest	<b>SW2</b>	9.6		23.5		33.1
Utoy	<b>UC1</b>				0.4	0.4
Utoy	<b>UC2A</b>				13.0	13.0
Utoy	<b>UC2B</b>				6.9	6.9

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>146.24</b>
Does carbon quantification use stratification (yes or no)	<b>No</b>
Percent tree canopy cover within Project Area	<b>98%</b>
Project stock (tCO <sub>2</sub> e)	<b>31,108</b>
Accounting Stock (tCO <sub>2</sub> e)	<b>24,886</b>
On-site avoided biomass emissions (tCO <sub>2</sub> e)	<b>20,571</b>



On-site avoided soil carbon emissions (tCO <sub>2</sub> e)	<b>8,567</b>
Deduction for displaced biomass emissions (tCO <sub>2</sub> e)	<b>3,765</b>
Deduction for displaced soil emissions (tCO <sub>2</sub> e)	<b>2,596</b>
Credits from avoided biomass emissions (tCO <sub>2</sub> e)	<b>16,807</b>
Credits from avoided soil emissions (tCO <sub>2</sub> e)	<b>5,971</b>
Total credits from avoided biomass and soil emissions (tCO <sub>2</sub> e)	<b>22,778</b>
Credits attributed to the project (tCO <sub>2</sub> e), excluding future growth	<b>22,778</b>
Contribution to Registry Reversal Pool Account	<b>2,278</b>
<b>Total credits to be issued to the Project Operator (tCO<sub>2</sub>e)</b> <i>(excluding future growth)</i>	<b>20,500</b>

### 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 83 percent deciduous, and 15 percent coniferous for 146.24 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 (m3/yr)	25,979.3	\$67,951.14
Air Quality (t/yr)	3.8874	\$9,033.28
Cooling – Electricity (kWh/yr)	200,495	\$15,217.57
Heating – Natural Gas (kBtu/yr)	94,017	\$976.87
<b>Grand Total (\$/yr)</b>		<b>\$93,178.87</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*

Project Operator has agreed to submit written reports every three years using the template provided by City Forest Credits.

### 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 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 13.40.

Approved by City Forest Credits on December 17, 2025.