

Verification Report

Carbon Credits for Lotus Country and Brownlee Properties

City Forest Credits Project Number 070

February 25, 2026

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1 INTRODUCTION

City Forest Credits engaged Matthew Lee (a Validation and Verification Body (VVB) acting as a third-party verifier) to verify the Carbon Credits for Lotus Country and Brownlee Properties (Project), Lake County, Illinois, for the reporting period October 28th, 2025 – October 27th, 2028. 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 Lake County Forest Preserve District (District) seeks to obtain carbon credits for a 26.52-acre Project Area across three recently purchased acquisitions in Lake County, Illinois. The Brownlee acquisition is part of Wadsworth Savanna Forest Preserve (Wadsworth Savanna). Wadsworth Savanna, part of the Upper Des Plaines River Watershed, is highlighted as a Conservation Opportunity Area in the IDNR's Illinois' Wildlife Action Plan and contains Species in Greatest Need of Conservation (SGNC). The Chicago Metropolitan Agency for Planning (CMAP) includes the parcel in its Conservation Opportunity and Regional Conservation Priority maps. It is included in the area of IDNR's Upper Des Plaines River Corridor Conservation Opportunity Area and in the Lake County Wetland Inventory. The preserve and adjacent high-quality wet prairie and savanna provide critical habitat for federal and state endangered and threatened plants and animals. The two Lotus Country acquisitions have significant ecological features, including wetlands, wooded areas, and the largest heron and egret rookery in Lake County. The acquisitions not only preserved critical wildlife habitats but also ensured that the unique and fragile ecosystems found there continue to thrive without disturbance.

Since 1958, the District has preserved, restored, and managed open space and natural lands for the public in Lake County. Thanks to the continued support of voters, today the District protects more than 31,500 acres of Lake County's most important natural areas, 200-plus miles of trails are maintained, and thousands of acres of habitat are restored each year for Lake County's native plants and animals.

1.2 CONTACT INFORMATION

Project Operator

Lake County Forest Preserve District
1899 West Winchester Rd.
Libertyville, Illinois, 60048
Contact: Matt Ueltzen, Manager of Restoration Ecology
Email: muelitzen@LCFPD.org
Phone: 847-968-3290

Verification Body

Matthew Lee
1307 Ashbourne Dr.
Lynchburg, VA 24501

Email: leemathew82@gmail.com
Phone number: 434-426-2448

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 City Forest Credits (CFC) Protocol, and that the Project is in compliance with all CFC requirements relating to eligibility, accounting, and documentation.

2 VERIFICATION CRITERIA

2.1 GENERAL

The Registry will accredit VVBs to act as third-party verifiers who meet the Registry's qualifications and complete training. Those accredited VVBs can then act to verify compliance with this Tree Preservation Protocol per International Standards Organization 14064-3. Specifically, the Registry adopts and utilizes the following standards from ISO 14064-3:

- Upon receiving a Project Design Document with data on eligibility, quantification of carbon and co-benefits, and a request for credits, the Registry will conduct a validation. If it validates the project at that stage, the Registry will retain a VVB to act as third-party verifier to verify compliance with this Protocol.
- The Registry requires a reasonable level of assurance in the accuracy the asserted GHG removals to a reasonable level.
- The verification items identified in the Tables 1 and 2 are all material elements, and any asserted GHG removals must be free of errors, misstatements, or omissions regarding those elements.
- The Registry will record, store, and track all quantification and verification data and either display it for public review or make it available for public review upon request.

2.2 PROTOCOL

The verification was conducted to the City Forest Credits Tree Preservation Protocol, version 13.40, February 29, 2024.

2.3 LEVEL OF ASSURANCE

This verification was conducted to a reasonable level of assurance. The Verification Report accurately reflects the documentation contained in the Project Design Document and supporting documents.

3 SCOPE OF VERIFICATION

- The Project encompasses land in Lake County, Illinois, specifically described in the Project Design Document.
- The Project Operator acquired three properties that make up the project, one property called Brownlee and two properties collectively called Lotus Country. All three properties have recorded encumbrances that limit any development of the parcel, logging, forest clearing or tree cutting except for mitigating hazards on site, ecological management for forest health, or for passive recreation. The properties contain important wildlife habitats as identified in statewide and regional conservation plans, wildlife plans and watershed management plans. In addition to the sequestration and storage of carbon, the site supports stormwater management and fulfills open space goals set by Lake County.
- The Project avoids emission of CO₂ from trees and soil, by avoiding conversion of forest to non-forest land cover and avoiding conversion of forest soil to impervious surface.
- The Project duration is 40 years, beginning October 28th, 2025. The Project Operator commits to protecting the trees within the Project Area and monitoring the project carbon stocks for the entire Project duration.
- The verification includes the 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); checking of calculations for accuracy and conformance with the Protocol.

4 VERIFICATION PROCESS

4.1 VERIFICATION ACTIVITIES

The verification process consisted of the following activities:

- Verifier checked all requirements in the Protocol (outlined in 4.2), 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
- Verifier independently checked mapping and calculated values in each stage of calculations
- Verifier reviewed the credit calculations. Verifier reviewed the Project Operator's assertion that the Project results in GHG emissions mitigation of 1,875 tons CO₂e
- Verifier submitted to the Project Operator the zoning code for Wadsworth Village and regulations governing development on the Brownlee site was more restrictive of forestland clearing for new development than originally identified, so the carbon quantification tool, PDD

and zoning document were updated to reflect less carbon stock being credited for the project. The PO updated the required documentation and resubmitted it for approval. All new documents and calculations were correct.

CITY FOREST CREDITS TREE PRESERVATION PROTOCOL REQUIREMENTS

4.1.1 Eligibility

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

- Project Operator Identity (Section 1.1): Verifier confirmed identity by reviewing Project Operator website or state/local records
- Project Documentation (Section 3): Verifier reviewed and confirmed Project Documentation including Project Design Document is complete and accurate.
- Project Implementation Agreement (Section 1.2): Verifier reviewed and confirmed fully executed Project Implementation Agreement on file.
- Project Location (Section 1.3): Verifier reviewing mapping and location data.
- Defining the Project Area (Section 1.4): Verifier confirmed the Project Area meets forest canopy cover requirements
- Land Ownership or Right to Receive Credits (Section 1.5): Verifier confirmed that 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
- Demonstrating Preservation and Threat of Loss (Section 4):
 - Verifier confirmed that trees within the Project Area were not protected from removal prior to the Project.
 - Verifier confirmed that trees within the Project Area are now preserved from removal by a recorded encumbrance that places covenants and development restrictions on the properties that make up the sites Brownlee and Lotus Country.
 - The Project Operator has committed to meeting the permanence requirements.
 - Prior to the Preservation Commitment action by the Project Operator there was threat of conversion of the project lands to non-forest cover.
- No Double Counting and No Net Harm (Section 5):
 - Verifier confirmed that Attestation of No Double Counting and No Net Harm is on file.
 - Verifier compared the Project geospatial data to the registered urban forest carbon preservation projects geospatial database using ESRI ArcPro's Intersect Tool which resulted in zero overlapping between the spatial datasets.

- Monitoring and Reporting (Section 8): Verifier confirmed that Project Operator has a plan for monitoring and reporting over the Project Duration, and the plan is plausible and reasonable.

4.1.2 Additionality

Verifier reviewed and confirmed that Project lands met the additionality requirements of the Protocol:

- Prior to the Preservation Commitment, lands were not protected from conversion by easement, zoning, or other legal mechanisms. Relevant critical areas were excluded from the Project Area.
- Prior to the Preservation Commitment, zoning allowed development including removal of existing trees
- 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, demonstrated by the perimeter test and the assessed test (past three years at value greater than \$8K/acre for bare land). The project area for Lotus Country is surrounded by 100% developed land. Brownlee’s project area is surrounded by 82.5% developed land. Brownlee and Lotus Country properties sold for more than \$8,000/acre. Brownlee sold for \$16,000/acre, Lotus Country acquisition 1 sold for \$9,000/acre, and Lotus Country acquisition 2 sold for more than \$27,000/acre per their sale agreements. Maps submitted by the PO confirm the adjacency of developed lands to the perimeter of both the project areas.
- Project Operator signed an Attestation of Additionality that includes information on the impact of carbon revenues to project success.
- If landowner is a land conservation entity, Project lands were acquired within two years of the date of Project application.

4.1.3 Permanence

The Project Operator has committed to CFC that the Project Operator will protect the trees on the Project Area at least 40 years. The declaration of development restrictions by the Lake County Forest Preserve District will protect the Project Trees and land for a period of not less than 40 years. The declarant acknowledges that this declaration will restrict the removal or clearing of trees on the property according to the recorded encumbrance.

4.1.4 Accounting

The Project documents both sites’ forest composition as predominantly white and red oak, with tree density of 186 trees/hectare for Lotus and 258 trees/hectare for Brownlee. Tree canopy cover was 80.3% for the Lotus site and 84.4% for Brownlee. Data to quantify the forest composition was conducted through randomized on-site forest sampling plots of 0.1 acres in size (based on 11.1.B CFC protocol for quantifying forest carbon stock), with 22 plots across the Lotus site and 7 plots across the Brownlee site. These data used required factors in carbon stock and offset calculations.

4.1.5 Leakage

Offset accounting makes deductions for expected displacement of emissions following the requirements of the Protocol.

5 VERIFICATION FINDINGS

All issues raised by Verifier were clarified or corrected by the Project Operator and all issues were closed by appropriate responses by Matthew Ueltzen, Manager of Restoration Ecology with the Lake County Forest Preserve District.

The Project documents and data were reviewed, and the Verifier found that the emission reductions claimed are reasonable and in accordance with the Preservation Protocol. The Verifier makes no further recommendations.

6 VERIFICATION RESULTS AND CONCLUSION

This verification of the Lotus Country and Brownlee Properties for the reporting period for the reporting period October 28th, 2025 – October 27th, 2028, 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.

Table 1. Project GHG Removals


Project Name	Issuance Year	GHG Reductions and Removals Attributed to the Project (mtCO₂e)	Reversal Pool Account (10%) (mtCO₂e)	Emission Reductions to be Issued to Project (mtCO₂e)
Lotus Country and Brownlee Properties	2026	2,084	208	1,875
Cumulative		2,084	208	1,875

Table 2. Ecosystem Co-Benefits Per Year

Ecosystem Services	Resource Units	Value
Rainfall Interception (m ³ /yr)	5,837.6	\$41,796.24
Air Quality (t/yr)	0.2443	\$367.87
Cooling – Electricity (kWh/yr)	45,953	\$3,487.85
Heating – Natural Gas (kBtu/yr)	859,244	\$8,364.55
Grand Total (\$/yr)		\$54,016.51

Because the project area is less than 50 acres, all credits are issued after third-party verification and validation by the Registry.

Verifier Signature

A handwritten signature in black ink, appearing to read "Matthew Lee", written in a cursive style.

Matthew Lee