California Environmental Protection Agency

AIR RESOURCES BOARD

Compliance Offset Protocol
U.S. Forest Projects

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Abbreviations and Acronyms

ARB	Air Resources Board
C	Carbon
CAR	Climate Action Reserve
CH_4	Methane
CO_2	Carbon dioxide
FIA	Forest Inventory and Analysis Program of the U.S. Forest Service
GHG	Greenhouse gas
lb	Pound
IFM	Improved Forest Management
N_2O	Nitrous oxide
Regulation	Cap-and-Trade Regulation, title 17, California Code of Regulations, sections 95800 et seq.
SSR	GHG Sources, GHG Sinks, and GHG Reservoirs
USFS	United States Forest Service

6.2 Improved Forest Management Projects

Improved Forest Management Projects that take place on private land – or on land that is transferred to public ownership at the time the project is initiated – must estimate baseline onsite carbon stocks following the requirements and procedures in Section 6.2.1. Improved Forest Management Projects that take place on land that was publicly owned prior to the offset project commencement date must estimate baseline onsite carbon stocks following the requirements and procedures in Section 6.2.2. Requirements for determining baseline carbon in harvested wood products, determining actual onsite carbon stocks, determining actual carbon in harvested wood products, and quantifying Secondary Effects are the same for all Improved Forest Management Projects.

6.2.1 Estimating Baseline Onsite Carbon Stocks – Private Lands

Quantification Methodology

The baseline approach for Improved Forest Management Projects on private lands applies a standardized set of assumptions to offset project-specific conditions. A key assumption is that baseline carbon stocks will depend on how a project's initial standing live carbon stocks compare to "Common Practice," defined as the average standing live carbon stocks on similar lands within the Forest Project's Assessment Area. In addition, baseline carbon stocks must be adjusted to reflect management practice on the Forest Owner's other landholdings in instances where Project Area carbon stocks are more than 20 percent below the carbon stocks on land within the same logical management unit. Finally, the baseline must be modeled to reflect all legal and economic constraints affecting the Project Area.

The following steps must be followed to estimate baseline carbon stocks:

1. Determine the Common Practice level of above-ground standing live carbon stocks applicable to the Project Area.
2. Determine if the Project Area's initial above-ground standing live carbon stocks are above or below Common Practice.
3. Estimate baseline above-ground standing live carbon stocks, taking into account financial and legal constraints on harvesting in the Project Area, as well as the minimum baseline level applicable to the Project Area, as defined in the requirements for Step 3, below. The minimum baseline level will depend on whether initial above-ground standing live carbon stocks are above or below Common Practice.
4. Determine the baseline carbon stocks over 100 years for all required carbon pools in the Project Area.

For all calculations in this section, all values for "carbon stocks" should be expressed in metric tons of CO_2-equivalent.

Step 1 – Determine the Common Practice Carbon Stocks for the Project's Assessment Area

As defined in this protocol, Common Practice refers to the average stocks of above-ground standing live carbon associated with the Assessment Area(s) covered by the Project Area. Common Practice is used as a reference point for baseline estimation. To determine a value for Common Practice, see Appendix F and the data available in the Forest Offset Protocol Resources section of ARB's website.

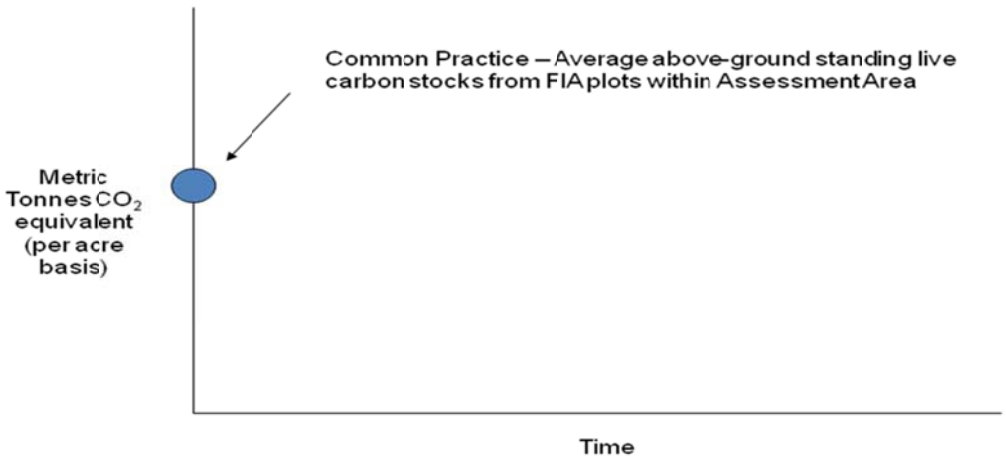

Figure 6.4. Common Practice as a Reference Point for Baseline Estimation

Step 2 – Determine if Initial Above-Ground Standing Live Carbon Stocks Are Above or Below Common Practice

To determine if initial above-ground standing live carbon stocks are above or below Common Practice, perform the following steps:

1. From the initial forest carbon inventory for the Project Area (conducted following the requirements in Appendix A), identify the metric tons of carbon contained in the *above-ground portion* of standing live carbon stocks.
2. Divide this amount by the number of acres in the Project Area.
3. Compare the result with the Common Practice value identified in Step 1.

Step 3 – Determine Baseline Above-Ground Standing Live Carbon Stocks

The baseline above-ground standing live carbon stocks must be determined by: (1) Modeling above-ground standing live carbon stocks through a series of growth and harvesting scenarios over 100 years; and (2) averaging the model results over the 100-year timeframe, so that the baseline is expressed as a single (average) value for above-ground standing live carbon stocks per acre in every year. The modeling must be performed following the requirements and methods in Appendix B and must meet the following conditions:

1. Growth and harvesting scenarios must reflect all legal constraints, following the requirements in Section 6.2.1.2.
2. Growth and harvesting scenarios must reflect any financial constraints, following the requirements in Section 6.2.1.3.
3. The averaged model results, expressed as above-ground standing live carbon stocks per acre, must not fall below a minimum baseline level (MBL). If initial above-ground standing live carbon stocks are above Common Practice, the MBL must be determined using the formula in Equation 6.5. If initial above-ground standing live carbon stocks are below Common Practice, then MBL must be determined using the formula in Equation 6.6.

A graphical example of a baseline meeting these conditions is provided in Figure 6.5 and Figure 6.6. Figure 6.5 shows the baseline before averaging; Figure 6.6 shows the baseline after averaging.

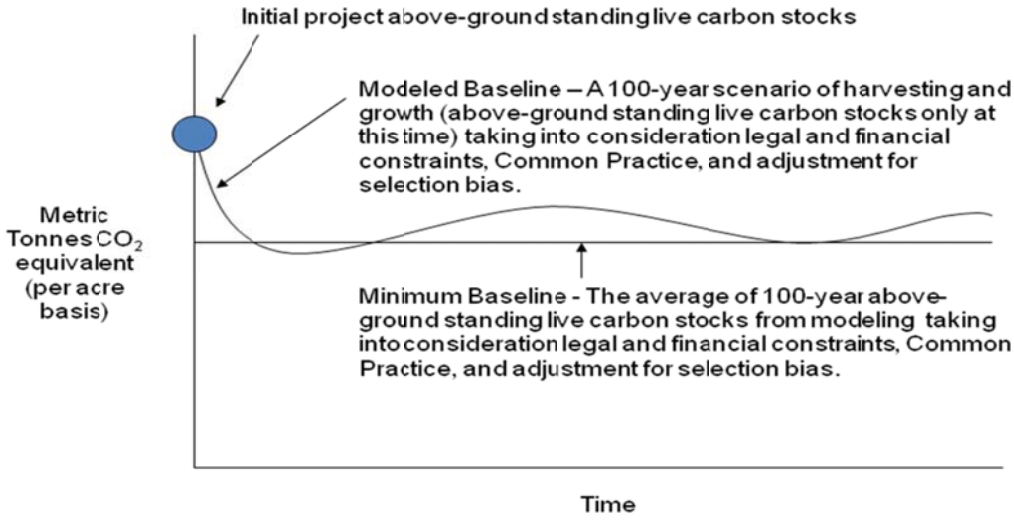

Figure 6.5. Modeling Standing Live Carbon Stocks Where Initial Stocks Are Above Common Practice

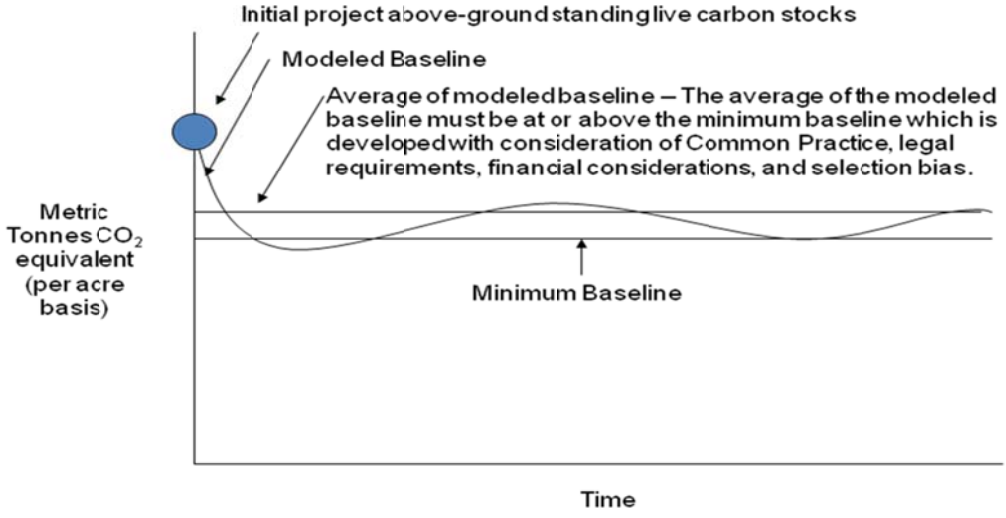

Figure 6.6. Averaging the Modeled Standing Live Carbon Stocks Where Initial Stocks Are Above Common Practice

Equation 6.5. Determining the Minimum Baseline Level Where Initial Stocks Are Above Common Practice

MBL = CP

Where,

MBL	=	Minimum baseline level (above-ground standing live carbon stocks)
CP	=	Common Practice (as determined in Step 1)

Equation 6.6. Determining the Minimum Baseline Level Where Initial Stocks Are Below Common Practice

MBL = MAX (MAX (HSR, ICS), MIN (CP, WCS))

Where,

MAX	=	The highest value in the set of values being evaluated.
MIN	=	The lowest value in the set of values being evaluated.
MBL	=	Minimum baseline level (above-ground standing live carbon stocks)
HSR	=	The "High Stocking Reference" for the Project Area. The High Stocking Reference is defined as 80 percent of the highest value for above-ground standing live carbon stocks per acre within the Project Area during the preceding 10-year period. To determine the High Stocking Reference, the Offset Project Operator or Authorized Project Designee must document changes in the Project Area's above-ground standing live carbon stocks over the preceding 10 years. Figure 6.7 presents a graphical portrayal of a High Stocking Reference determination.
CP	=	Common Practice (as determined in Step 1)
ICS	=	Initial above-ground standing live carbon stocks per acre within the Project Area (as determined in Step 2)
WCS	=	The weighted average above-ground standing live carbon stocks per acre for all Forest Owner (and affiliate) landholdings within the same logical management unit as the Project Area. See Section 6.2.1.1 for requirements and methods for calculating WCS.

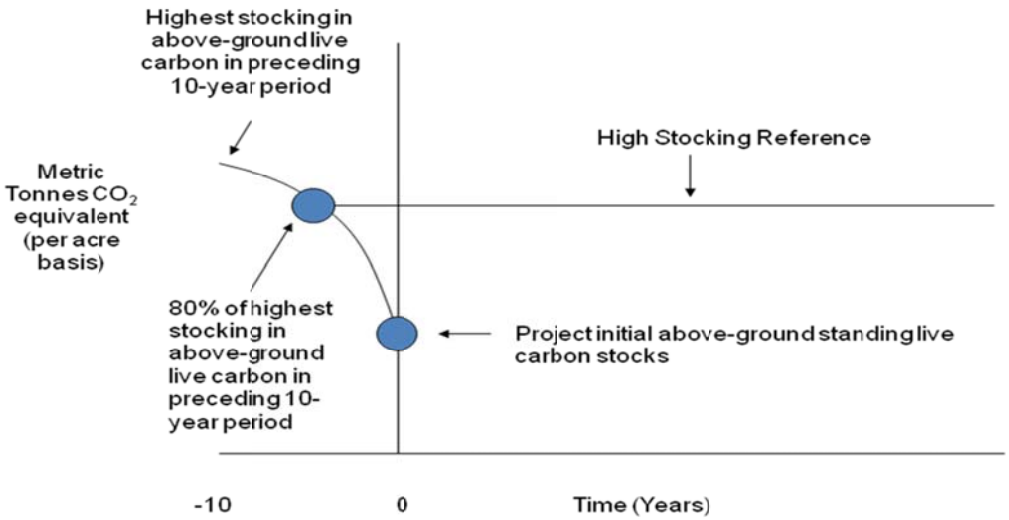

Figure 6.7. Determining a Project Area's High Stocking Reference
Note: It is possible for the High Stocking Reference to be higher than Common Practice, even where initial live-tree carbon stocks for the project are below Common Practice.

Step 4 – Determine the Baseline for All Carbon Pools

Once the baseline for above-ground standing live carbon stocks has been determined, perform the following steps:

1. Estimate baseline carbon stocks for all other required carbon pools identified for the offset project (including below-ground carbon stocks, as well as standing dead carbon stocks where applicable). These carbon stocks must be modeled or estimated following the requirements and methods in Appendix A and Appendix B.
2. Average the results, so that the baseline for other carbon pools contains the same (average) value for carbon stocks in every year.
3. Sum the above-ground standing live carbon stock baseline and the baseline for all other carbon stocks to produce a final baseline for all carbon pools (see Figure 6.8).

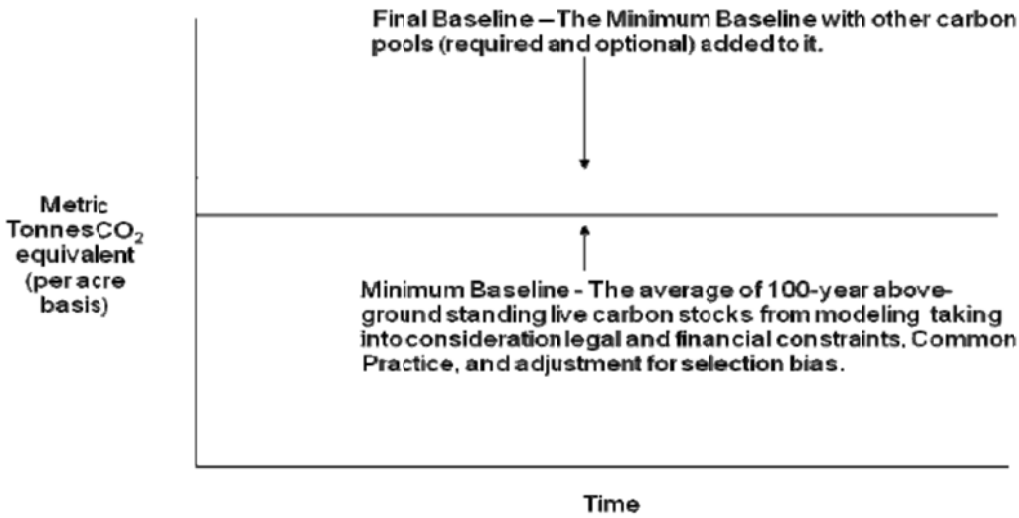

Figure 6.8. Final Baseline Incorporating All Required Carbon Stocks

6.2.1.1 Determining Weighted Average Carbon Stocks (WCS) on Lands in the Same Logical Management Unit as the Project Area

Quantification Methodology
Determining the minimum baseline level (MBL) for an Improved Forest Management project requires a comparison to carbon stocking levels on other lands within the same logical management unit (LMU) as the Project Area. The carbon stocking level within the LMU (expressed as the weighted average above-ground standing live carbon stocks per acre for all lands in the same LMU) is used as a parameter (WCS) for determining the MBL in Equation 6.6.

A “logical management unit” or “LMU” is defined as all land that the Forest Owner and its affiliate(s) (as defined below) either own in fee or hold timber rights on, and which it or they manage as an explicitly defined planning subunit. LMUs are generally characterized by unique biological, geographical, and/or geological conditions, are generally delimited by watershed boundaries and/or elevational zones, and contain unique road networks. In addition, an LMU must:

- Be a sustainable planning subunit as demonstrated by inventory reports and growth and harvest projections for the LMU or;
- Where even aged management is utilized, have a uniform distribution (by area) of 10-year age classes that extend to the normal rotation age (variation of any 10-year age class not to exceed 20%) or;
- Where uneven aged management is utilized, have between 33% and 66% of the forested stands exceeding the retention standards identified in the growth and harvest projections by a minimum of 25% (basal area).

An “affiliate” is defined as any person or entity that, directly or indirectly, through one or more intermediaries, controls or is controlled by or is under common control with the Forest Owner, including any general or limited partnership in which the Forest Owner is a partner and any limited liability company in which the Forest Owner is a member. For the purposes of this definition, "control" means the possession, direct or indirect, of the power to direct or cause the

direction of the management and policies of a person, whether through the ownership of voting securities, by contract or otherwise, and "person" means an individual or a general partnership, limited partnership, corporation, professional corporation, limited liability company, limited liability partnership, joint venture, trust, business trust, cooperative or association or any other legally-recognized entity.

If an explicit, existing LMU containing the Project Area cannot be identified, the LMU must be defined by identifying all lands where the Forest Owner and its affiliate(s) (as defined above) either own in fee or hold timber rights within the same Assessment Area(s) covered by the Project Area. Assessment Areas covered by the Project Area are identified in Step 1, above, using the information in Appendix F.

To calculate WCS, estimate the above-ground standing live carbon stocks per acre for the entire LMU containing the Project Area (including the Project Area itself). This can be done using either existing inventory data, or a stratified vegetation-type analysis.

6.2.1.1.1 Calculating WCS Using Inventory Data

Quantification Methodology
If sufficient inventory data for LMU lands exist to quantify above-ground standing live carbon stocks for the entire LMU, then the formula in Equation 6.7 must be used to calculate WCS.

Equation 6.7. Formula for WCS Using Inventory Data

$$If\ \left|\left(1-\frac{ECS}{ICS}\right)\right| \leq 0.2, then\ WCS = ICS$$

$$If\ \left|\left(1-\frac{ECS}{ICS}\right)\right| > 0.2, then\ WCS = \frac{ICS \cdot PA + ECS \cdot EA}{PA + EA}$$

Where,

WCS = The weighted average above-ground standing live carbon stocks per acre within the LMU containing the Project Area

ICS = Initial above-ground standing live carbon stocks per acre within the Project Area

PA = Size of the Project Area in acres

ECS = Above-ground standing live carbon stocks per acre within the LMU *but excluding the Project Area* (EA), as determined from existing inventory data

EA = Size of the LMU in acres, e*xcluding the Project Area*

6.2.1.1.2 Calculating WCS Using Stratified Vegetation-Type Analysis

Quantification Methodology
If sufficient inventory data is not available for the LMU, a stratified vegetation-type analysis must be used to calculate WCS. To conduct this analysis, all landholdings within the LMU – including the Project Area – must be divided into vegetation types and size class/canopy cover categories as delimited in Table 6.2 with a resolution for classification no greater than 40 acres. Each vegetation class has a "carbon rating" provided in Table 6.2. WCS must be calculated using the

ratio of average carbon stocking on LMU lands relative to carbon stocking on Project Area lands (referred to as the "stratified carbon weighting factor" or SWF). The required formulas are specified in Equation 6.8 and Equation 6.9.

Equation 6.8. Formula for WCS Using Stratified Vegetation-Type Analysis

$$If\ \left|\left(1-\frac{ECS}{ICS}\right)\right| \leq 0.2, then\ WCS = ICS$$

$$If\ \left|\left(1-\frac{ECS}{ICS}\right)\right| > 0.2, then\ WCS = \frac{ICS \cdot PA + SWF \cdot ICS \cdot EA}{PA + EA}$$

Where,

WCS = The weighted average above-ground standing live carbon stocks per acre within the LMU containing the Project Area

ECS = Above-ground standing live carbon stocks per acre within the LMU, but excluding the Project Area (EA), as determined from existing inventory data

ICS = Initial above-ground standing live carbon stocks per acre within the Project Area

PA = Size of the Project Area in acres

SWF = The stratified carbon weighting factor for the LMU (from Equation 6.9 below)

EA = Size of the LMU in acres, e*xcluding the Project Area*

Equation 6.9. Formula for LMU Stratified Carbon Weighting Factor

$$SWF = \frac{\sum_i (PA_i \cdot CR_i)}{\sum_i PA_i} \div \frac{\sum_i (EA_i \cdot CR_i)}{\sum_i EA_i}$$

Where,

PA_i = Acres of the Project Area in forest vegetation type *i* (from Table 6.2)

EA_i = Acres of the LMU, e*xcluding the Project Area,* in forest vegetation type *i* (from Table 6.2)

CR_i = Carbon rating for forest vegetation type *i* (from Table 6.2)

Table 6.2. Vegetation Classes for Stratification

Forest Vegetation Description	Average Diameter (Breast Height)	Average Canopy Cover	Carbon Rating (metric tons CO_2e)
Brush	0"	NA	0
Regeneration	3"	NA	0.5
Pole-sized trees	6" - 12"	< 33%	2
Pole-sized trees	6" - 12"	33% - 66%	4
Pole-sized trees	6" - 12"	>66%	6
Small Sawlogs	12" - 20"	< 33%	4
Small Sawlogs	12" - 20"	33% - 66%	8
Small Sawlogs	12" - 20"	>66%	12
Large Sawlogs	20" - 36"	< 33%	8
Large Sawlogs	20" - 36"	33% - 66%	16
Large Sawlogs	20" - 36"	>66%	24
Very Large Trees	>36"	< 33%	16
Very Large Trees	>36"	33% - 66%	32
Very Large Trees	>36"	>66%	48

6.2.1.2 Consideration of Legal Constraints

In modeling the baseline for standing live carbon stocks, all legal constraints that could affect baseline growth and harvesting scenarios must be incorporated. The standing live carbon stock baseline must represent a growth and harvesting regime that fulfills all legal requirements. Voluntary agreements that can be rescinded, such as rental contracts and forest certifications, are not legal constraints. Habitat Conservation Plans (HCPs) and Safe Harbor Agreements (SHAs) that are in place more than one year prior to the offset project commencement date shall be modeled as legal constraints. HCPs and SHAs that are approved after the date one year prior to the offset project~~'s~~ commencement date are not considered legal constraints for the purpose of baseline modeling and may be disregarded from the baseline modeling.

Legal constraints include all laws, regulations, and legally-binding commitments applicable to the Project Area at the time of offset project commencement that could affect standing live carbon stocks. Legal constraints include:

1. Federal, state, or local government regulations that are required and might reasonably be anticipated to influence carbon stocking over time including, but not limited to:
    a. Zones with harvest restrictions (e.g. buffers, streamside protection zones, wildlife protection zones)
    b. Harvest adjacency restrictions
    c. Minimum stocking standards
2. Forest practice rules, or applicable Best Management Practices established by federal, state, or local government that relate to forest management.
3. Other legally binding requirements affecting carbon stocks including, but not limited to, covenants, conditions and restrictions, and other title restrictions in place prior to or at the time of project initiation, including pre-existing conservation easements, Habitat Conservation Plans, Safe Harbor Agreements, and deed restrictions, excepting an

encumbrance that was put in place and/or recorded less than one year prior to the offset project commencement date, as defined in Section 3.5.

For forest projects located in California, the baseline must be modeled to reflect all silvicultural treatments associated with any submitted, active, or approved timber harvest plans (THPs) at the time of offset project commencement that would affect harvesting and management within the Project Area during the Project Life. All legally enforceable silvicultural and operational provisions of a THP – including those operational provisions designed to meet California Forest Practice Rules requirements for achieving Maximum Sustained Production of High Quality Wood Products [14 CCR 913.11 (933.11, 953.11)] – are considered legal constraints and must be reflected in baseline modeling for as long as the THP will remain active. For portions of the Project Area not subject to THPs (or over time periods for which THPs will not be active), baseline carbon stocks must be modeled by taking into account any applicable requirements of the California Forest Practice Rules and all other applicable laws, regulations, and legally binding commitments that could affect onsite carbon stocks. On a case-by-case basis, the California Department of Forestry and Fire Protection (Cal FIRE) may assist in identifying minimum carbon stocking levels that would be effectively required under California Forest Practice Rules.

6.2.1.3 Consideration of Financial Constraints

In modeling the baseline for standing live carbon stocks, financial constraints that could affect baseline growth and harvesting scenarios must be included. It must be demonstrated that the growth and harvesting regime assumed for the baseline is financially feasible through one of the following means:

1. A financial analysis of the anticipated growth and harvesting regime that captures all relevant costs and returns, taking into consideration all legal, physical, and biological constraints. Cost and revenue variables in the financial analysis may be based on regional norms or on documented costs and returns for the Project Area or other properties in the Forest Project's Assessment Area.
2. Providing evidence that activities similar to the proposed baseline growth and harvesting regime have taken place on other properties within the Forest Project's Assessment Area within the past 15 years. The evidence must demonstrate that harvesting activities have taken place on at least one other comparable site with:
    a. Slopes that do not exceed slopes in the Project Area by more than 10 percent
    b. An equivalent zoning class to the Project Area
    c. Comparable species composition to the Project Area (i.e. within 20 percent of project species composition based on trees per acre)

6.2.2 Estimating Baseline Onsite Carbon Stocks – Public Lands

Quantification Methodology

For Improved Forest Management Projects on lands owned or controlled by public agencies, the baseline must be estimated by:

1. Conducting an initial forest carbon inventory for the Project Area
2. Projecting future changes to Project Area forest carbon stocks by:
    a. Extrapolating from historical trends
    b. Anticipating how current public policy will affect onsite carbon stocks

The method that results in the highest estimated carbon stock levels must be used to determine the baseline.

To extrapolate from historical trends:

- For Project Areas that have a ten-year history of declining carbon stocks, the baseline must be defined by the average of the carbon stocks over the past ten years and considered static for the project life (i.e. the same level of carbon stocks is assumed in every year).
- For Project Areas that demonstrate an increasing inventory of carbon stocks over the past ten years, the growth trajectory of the baseline shall continue until the forest (under the baseline stocks) achieves a stand composition consistent with comparable forested areas that have been relatively free of harvest over the past 60 years.

To anticipate how current public policy will affect onsite carbon stocks, the baseline must be modeled following the requirements and methods in Appendix B incorporating constraints imposed by all applicable statutes, regulations, policies, plans and Activity-Based Funding.

6.2.3 Estimating Baseline Carbon in Harvested Wood Products

Quantification Methodology

To estimate the amount of baseline carbon transferred to long-term storage in wood products each year, the following steps must be performed:

1. Determine the *average* amount of carbon in standing live carbon stocks (prior to delivery to a mill) that would have been harvested in each year of the baseline over 100 years. The result will be a uniform estimate of harvested carbon in each year of the baseline. This estimate is determined at offset project commencement, using the same biomass equations used to calculate biomass in live trees, and will not change over the course of the project.
    a. For offset projects on private lands, the amount of harvested carbon must be derived from the growth and harvesting regime used to develop the baseline for onsite carbon stocks in Section 6.2.1.
    b. For offset projects on public lands, the amount of harvested carbon must be derived from the growth and harvesting regime assumed in the baseline for onsite carbon stocks derived in Section 6.2.2.
2. On an annual basis, determine the amount of harvested carbon that would have remained stored in wood products, averaged over 100 years, following the requirements and methods in Appendix C.

6.2.4 Determining Actual Onsite Carbon Stocks

Quantification Methodology

Actual carbon stocks for Improved Forest Management projects must be determined by updating the Project Area's forest carbon inventory. This is done by:

1. Incorporating any new forest inventory data obtained during the previous year into the inventory estimate. Any plots sampled during the previous year must be incorporated into the inventory estimate.
2. Using an approved model to "grow" (project forward) prior-year data from existing forest inventory plots to the current reporting year. Approved growth models and requirements and methods for projecting forest inventory plot data using models are provided in Appendix B.
3. Updating the forest inventory estimate for harvests and/or disturbances that have occurred during the previous year.
4. Applying an appropriate confidence deduction for the inventory based on its statistical uncertainty, following the requirements and methods in Appendix A, Section A.4.

6.2.5 Determining Actual Carbon in Harvested Wood Products

Quantification Methodology

Perform the following steps to determine actual carbon in harvested wood products:

1. Determine the actual amount of carbon in standing live carbon stocks (prior to delivery to a mill) harvested in the current year (based on harvest volumes determined in Section 6.2.4).
2. Determine the amount of actual harvested carbon that will remain stored in wood products, averaged over 100 years, following the requirements and methods in Appendix C.

6.2.6 Quantifying Secondary Effects

Quantification Methodology

For Improved Forest Management Projects, significant Secondary Effects can occur if a project reduces harvesting in the Project Area, resulting in an increase in harvesting on other properties. Equation 6.10 must be used to estimate Secondary Effects for Improved Forest Management projects:

Equation 6.10. Secondary Effects Emissions

$$If \sum_{n=1}^{y}(AC_{hv,n} - BC_{hv,n}) > 0, then\ \ SE_y = 0$$

$$If \sum_{n=1}^{y}(AC_{hv,n} - BC_{hv,n}) < 0, then\ SE_y = (AC_{hv,y} - BC_{hv,y}) \times 20\%$$

Where,

SE_y	=	Estimated annual Secondary Effects (used in Equation 6.1.)
$AC_{hv,\ n}$	=	Actual amount of onsite carbon harvested in reporting period n (prior to delivery to a mill), expressed in CO_2-equivalent tons
$BC_{hv,\ n}$	=	Estimated average baseline amount of onsite carbon harvested in reporting period n (prior to delivery to a mill), expressed in CO_2-equivalent tons, as determined in Step 1 of Section 6.2.3
Y	=	The current year or reporting period

6.3 Avoided Conversion Projects

6.3.1 Estimating Baseline Onsite Carbon Stocks

Quantification Methodology

The baseline for Avoided Conversion Projects is a projection of onsite forest carbon stock losses that would have occurred over time due to the conversion of the Project Area to a non-forest land use. Estimating the baseline for Avoided Conversion Projects involves two steps:

1. Characterizing and projecting the baseline; and
2. Discount for the uncertainty of conversion probability.

Appendix A Developing an Inventory of Forest Project Carbon Stocks

Quantification Methodology

This appendix provides requirements for quantifying a Forest Project's forest carbon stocks. It explains how to identify the required forest carbon pools measured in a Forest Project, as well as the steps necessary for quantifying the existing carbon stocks in the selected pools within the Project Area. Carbon inventory information serves two purposes:

1. It is used as the basis for modeling and estimating carbon stocks in a Forest Project's baseline (following the requirements of Section 6).
2. It is used to quantify actual carbon stocks during the course of a project.

This appendix explains the essential steps and requirements for completing a carbon inventory for all required onsite carbon pools associated with a Forest Project.

A.1 Provide Background Information on Forest Area

To begin the inventory process, develop a general description of the activities and land use patterns that influence carbon stocks in the Project Area, including all the information required in Section 9.1.1.1. This information will help inform the initial design of the forest inventory, as well as the estimations of carbon stocks. This information will be reviewed during verification.

A.2 Measure Carbon Pools in the Project Area

Forest carbon pools are broadly grouped into the following categories:

1. Living biomass
2. Onsite dead biomass
3. Soil

Values for some of these categories of carbon will be determined through direct sampling. Table A.1 indicates the categories with their associated carbon pools and identifies which pools must be quantified for all offset projects versus those are excluded depending on the project. It also shows how the value for the pool is determined.

Table A.1. Requirements of carbon pool categories and determination of value for pool

Category	Carbon Pool	Improved Forest Management	Reforestation	Avoided Conversion	Determination of Value
Living biomass	Standing Live	Required	Required*	Required	Sampled in Project
	Shrubs and Herbaceous Understory	Excluded	Required	Excluded	Sampled in Project
Onsite dead biomass	Standing Dead	Required	Required	Required	Sampled in Project
Soil	Soil**	Required/ Excluded**	Required/ Excluded**	Required/ Excluded**	Sampled in project

* Pre-existing trees must be distinguished from planted trees. Since pre-existing and new trees are easy to distinguish for several decades after tree planting, pre-existing trees do not need to be inventoried until the offset project first seeks verification of GHG reductions and GHG removal enhancements.
** Soil carbon is not anticipated to change significantly as a result of most Forest Project activities. Soil carbon is excluded except when specified in Section 5.

A.3 Developing Onsite Forest Carbon Inventories

To develop estimates of carbon stocks in the carbon pools identified in Table A.1, a forest inventory must first be conducted. Standard forest inventories require the establishment of sample plots and provide inventory estimates in terms of cubic or board foot volume. These measurements are based on the species, trunk or bole diameter, form and height of the tree.

Each Offset Project Operator or Authorized Project Designee must develop and document a forest carbon inventory methodology. The inventory method must be capable of quantifying carbon stocks for required carbon pools to a high degree of accuracy. A complete inventory methodology must include:

1. A description of the Offset Project Boundary, including a list of all carbon pools included in the Offset Project Boundary.
2. For each carbon pool, include a detailed description of the inventory sampling methodology used to quantify that carbon pool, with references clearly documented. This documentation must include:
    a. Standard procedures for the collecting of field measurements. These procedures must be detailed enough so that any qualified forester would be able to accurately repeat the previous measurements. These procedures must include a description of the types of sample plots, location of plots, and frequency for updating or replacing sample plots as well as the forest carbon inventory as a whole;
    b. Standard procedures for where and how to measure parameters used in biomass calculations such as dbh and height (including for irregular trees), how to classify dead wood, and for any other aspects of sampling where a consistent method needs to be documented; and
    c. Stratification rules (pre and post sampling), if applicable, that include a map of vegetation strata, results of stratification (area by strata), tools for application

(such as GIS, aerial photos), and a discussion of how boundaries were determined.

3. Documentation of all analytic methods and biomass equations used to translate field measurements into volume or biomass carbon estimates;
4. A documented quality assurance / quality control (QA/QC) plan including procedures for internal review to ensure that standard operating procedures are being followed. The QA/QC plan must include procedures for assessing and ensuring the quality of collection, transfer and archiving of field data; procedures for data entry and analysis, and data maintenance and archiving; and any other relevant procedures to ensure quality and consistency in the collection and maintenance of data used to compile the offset project data reports.
5. Description of data management systems and processes, including the collection, storage and analysis of inventory related data analytical methods to translate field measurements into volume and/or biomass estimates.
6. A change log documenting any changes in the inventory methods or equations used to calculate carbon stocks.
7. Standard procedures for updating the forest carbon inventory, including documented procedures to account for:
    a. Harvest;
    b. Growth;
    c. Disturbance;
    d. Incorporating new inventory and plot data, and retiring older sample plots;
    e. Modeling, as allowed under Appendix B; and
    f. Application of appropriate confidence deduction.

Inventory methods and sampling procedures, once established, must be consistent over the life of the project. Any changes to inventory methods or calculations must be documented and justified in the change log.

Allometric Equations and Biomass/Carbon Mass Estimates

The equations in this appendix and in the Forest Offset Protocol Resources section of ARB's webpage must be used for biomass and carbon mass estimations using the bole diameter and total height for live trees and sound standing dead trees. Estimates of standing dead tree (for non-sound trees) biomass must be computed in terms of cubic volume and subsequently converted to biomass/carbon mass estimates.

Sample Plots

Any plot data used for deriving the forest carbon inventory estimates must have been sampled within the last 12 years. The scheduling of plot sampling may occur in one time period or be distributed over several time periods. Either approach is acceptable so long as an inventory of the entire Project Area (its required carbon pools and corresponding sample plots) is completed within 12-year intervals.

Steps for Developing a Complete Forest Carbon Inventory

The steps that follow provide more detail on establishing and maintaining a complete inventory and estimating carbon stocks. Results must be summarized in a table when submitting required data in an Offset Project Data Report (see Section 9).

Step 1 – Developing Inventory Methodology and Sample Plots

The Offset Project Operator or Authorized Project Designee must develop and describe a methodology to sample for biomass or volume of all required carbon pools. If a pre-existing forest inventory is used to develop a forest carbon inventory, all steps here must be followed to ensure the existing inventory meets the requirements of this protocol.

Sampling methodology and measurement standards should be consistent throughout the duration of the Forest Project. If new methodologies are adopted, they must achieve an equal or greater accuracy relative to the original sampling design. All sampling methodologies and measurement standards must be statistically sound and must be approved during verification.

Stratification is not required, but it may simplify verification. Temporary flagging of plot center, as is customary to allow for check cruising, is required to ensure ongoing inventory quality and allow for offset verifiers to visit plots when verifying inventory procedures. If permanent plots are used, which are statistically efficient for stock change estimates, permanent plot monumenting must be sufficient for relocation. Plot centers should be referenced on maps, preferably with GPS coordinates. The methodologies utilized must be documented and made available for verification and public review. The design of the sampling methodology and measurement standards must incorporate the requirements in the following table. All tree species within the Project Area must be measured regardless of the merchantability of the trees.

Table A.2. Minimum required sampling criteria for estimated pools

Carbon Pool	Name of Requirement	Description of Requirement
Standing Live Carbon Stocks (above-ground portion)	Diameter (breast height) Measurements	The minimum diameter (at breast height) must be stated in the methodology, and this minimum diameter must not be greater than 5 inches (inventory must include all trees 5 inches and greater in diameter). Height must be measured as required in appropriate biomass equations.
	Measurement Tools	Description of tools used for height measurement, diameter measurement, and plot measurement.
	Measurement Standards	The methodology shall include a set of standards for tree and plot size measurements.
	Plot Layout	A description of plot layout.
	Merchantability of Trees	The methodology shall include all trees regardless of current merchantability to be included in the sampling design.
	Allometric Equation used for Estimating Biomass	The methodology must include a description of the allometric equation used to estimate the whole tree biomass (bole, branches, and leaves) from bole diameter measurements. The use of functions other than those provided in the protocol will need to be approved by ARB and the verification body.
Standing Live Carbon Stocks (below-ground portion)	Plot-level Allometric Equation used for Estimating Biomass	Apply model (Cairns, Brown, Helmer, & Baumgardner, 1997) to estimate below-ground biomass density. This model equation is based on above-ground biomass density in tons per hectare. The use of a function other than that provided in the protocol will need to be approved by ARB and the verification body.
Herbaceous Understory	Sampling Methodology	The sampling methodology prepared by Brown, Shoch, Pearson, & Delaney (2004). Alternative methodologies need to be reviewed and approved by ARB and the verification body.
Standing Dead Trees	Diameter (breast height) and top Diameter Measurements	The minimum diameter (at breast height) must be stated in the methodology, and this diameter must not be greater than 5 inches. The minimum height of standing dead trees is 15'. The method must include how volume is derived where a total height does not exist (i.e. where the tree is broken).
	Measurement Tools	Description of tools used for height, diameter and plot measurement.
	Measurement Standards	The methodology shall include a set of standards for height and diameter measurements.
	Plot Layout	A description of plot layout (may be the same layout as for live tree biomass).
	Merchantability of Trees	The methodology shall include all trees regardless of current merchantability to be including in the sampling design.

Step 2 – Estimating Carbon in Live Trees from Sample Plots

Standing live tree carbon estimates are required for all offset projects. The standing live tree estimate includes carbon in all portions of the tree, including the bole, stump, bark, branches, leaves, and roots. The Offset Project Operator or Authorized Project Designee is responsible for determining appropriate methodologies for sampling to determine standing live tree carbon stocks. The estimate of above-ground live tree biomass must be combined with the estimates of biomass from other carbon pools to determine a mean estimate of the included pools derived from sampling, along with a summary that describes the statistical confidence of the estimate.

All biomass estimates must be converted to carbon estimates. The derived estimate of biomass must be multiplied by 0.5 to calculate the mass (kg) in carbon. This product must be multiplied by 0.001 tons/kg to convert the mass to metric tons of carbon.

Approved biomass equations will be available in the Forest Offset Protocol Resources section of ARB's website.

Step 3 – Estimating Carbon Standing Dead Tree Carbon from Sample Plots

An inventory of carbon stocks in standing dead tree carbon is required for all Forest Projects. The Offset Project Operator or Authorized Project Designee must provide a sampling methodology for standing dead tree carbon as part of an overall sampling strategy (discussed in Step 1). Sound dead trees can be computed using the equations provided for standing live carbon in Step 2. The estimate of standing dead tree carbon for highly decayed trees (broken tops, missing branches, etc.), must be calculated first volumetrically and subsequently converted to biomass and carbon tons.

For those trees where volume is computed, the volume will need to be converted to biomass density by applying conversion factors based on decay class. The methodology developed must include a description of the calculation techniques used to determine biomass density by decay class. The estimate of biomass density must be computed in terms of metric tons of carbon on a per acre basis. The density factors by decay class from Harmon et al (2008) may be used to estimate density in standing dead carbon stocks.

Step 4– Estimate Carbon in Shrubs and Herbaceous Understory from Sample Plots

Any methodology developed for measuring carbon in shrubs must be reviewed during verification. The most applicable biomass estimation methods may be used, including photo series, the estimation functions from published papers, direct sampling, or combinations of approaches.

Step 5 – Estimate of Carbon Tons in Soil

Changes in total soil carbon are a challenge to measure over short timeframes, as this pool changes slowly and is usually dependent on the rate of biomass input relative to soil decomposition. The sampling methodology and protocols for deriving carbon estimates in soil must be developed as part of an overall sampling strategy (discussed in Step 2). Use the soil sampling methodology prepared by Brown, Shoch, Pearson, & Delaney (2004).

Step 6 – Sum Carbon Pools

The metric tons of carbon in each carbon pool, as derived from the preceding steps, must be entered in the following table. For the purpose of quantifying GHG reductions and GHG removal enhancements, all numbers must be converted to metric tons of CO_2-equivalent by multiplying by 3.664.

Table A.3. Summarizing Carbon Pools and Calculating Total Carbon

Carbon Pool	Source	Gross CO_2-equivalent Tons per Acre
Step 2 Live Carbon Stocks	From sampling results of trees.	
Steps 3 Standing Dead Carbon Stocks	From sampling results of standing dead biomass.	
Step 4 Shrubs and Herbaceous Understory	From sampling results of shrubs and herbaceous understory.	
Step 5 Soil	From sampling results of soil.	
Sum of CO_2-equivalent Tons from Required Pools		

A.4 Applying a Confidence Deduction

Any forest carbon inventory estimate will be subject to statistical uncertainty. Where statistical confidence is low, there is a higher risk of overestimating a project's actual carbon stocks and therefore a higher risk of over-quantifying GHG reductions and GHG removal enhancements. To help ensure that estimates of GHG reductions and GHG removal enhancements are conservative, a confidence deduction must be applied each year to the inventory of actual onsite carbon stocks. A confidence deduction is *not* applied to the forest carbon inventory when it is used to model baseline carbon stocks.

To determine the appropriate confidence deduction, perform the following:

1. Compute the standard error of the inventory estimate (based on the carbon in all carbon pools included in the forest carbon inventory).
2. Multiply the standard error by 1.645.
3. Divide the result in (2) by the total inventory estimate and multiply by 100. This establishes the sampling error (expressed as a percentage of the mean inventory estimate from field sampling) for a 90 percent confidence interval.
4. Consult Table A.5 to identify the percent confidence deduction that must be applied to the inventory estimate for the purpose of calculating GHG reductions and removals (i.e. variable CD_y in Equation 6.1 in Section 6).

Table A.4. Forest carbon inventory confidence deductions based on level of confidence in the estimate derived from field sampling.

Sampling Error (% of Inventory Estimate)	Confidence Deduction
0 to 5%	0%
5.1 to 19.9%	(Sampling Error – 5.0%) to the nearest $1/10^{th}$ percentage
20% or greater	100%

The confidence deduction must be updated each time the offset project is subject to verification, but must remain unchanged between verifications. If increased sampling over time results in a

lower confidence deduction at the time of verification, the lower deduction must be applied to inventory estimates in the most recent reporting period subject to verification at that time. ARB or registry offset credits may be issued in the most recent reporting period for any verified increase in quantified GHG reductions and GHG removal enhancements associated with the new (lower) confidence deduction. Conversely, if a loss of qualified sampling plots results in a higher confidence deduction, this higher deduction is applied to the inventory estimates in the most recent reporting period subject to verification at that time. Any resulting decrease in quantified GHG reductions and GHG removal enhancements from prior years as a result of the increased confidence deduction will be treated as an intentional reversal, and must be compensated pursuant to the Regulation.

Appendix B Modeling Carbon Stocks

Quantification Methodology

This protocol requires the use of certain empirical-based models to estimate the baseline carbon stocks and project stocks of selected carbon pools within the Project Area. These models may also be used to supplement assessments of actual changes in carbon stocks resulting from the Forest Project.

B.1 About Models and Their Eligibility for Use with Forest Projects

Empirical-based models are used for estimating existing values where direct sampling is not possible or cost-effective. They are also used to forecast the estimations derived from direct sampling into the future. Field measurements provide the basis for inferring value through the use of these models.

The models that simulate growth projections have two basic functions in the development and management of a forest project. Models project the results of direct sampling through simulated forest management activity. These models, often referred to as growth and yield simulation models, may project information regarding tree growth, harvesting, and mortality over time – values that must ultimately be converted into carbon in an additional step. Other models may combine steps and estimate tree growth and mortality, as well as changes in other carbon pools and conversions to carbon, to create estimated projections of carbon stocks over time.

Models are also used to assist in updating inventory plots so that the plots can represent a reporting year subsequent to their actual sample date. The model simulates the diameter and height increment of sampled trees for the length of time between their sampled date and the reporting year. The limit to the use of models for updating plot data is described in Appendix A.

The following growth models have been approved:

- CACTOS: California Conifer Timber Output Simulator
- CRYPTOS: Cooperative Redwood Yield and Timber Output Simulator
- FVS: Forest Vegetation Simulator
- SPS: Stand Projection System
- FPS: Forest Projection System
- FREIGHTS: Forest Resource Inventory, Growth, and Harvest Tracking System
- CRYPTOS Emulator
- FORESEE

Inventory plot data may be updated for estimating diameter and height growth by incorporating data obtained from sample plots, as in a stand table projection. To qualify for this method:

- The Project Area shall be stratified into even-age management and uneven-age management.
- Diameter increment shall be based on the average annual increment of a minimum of 20 samples of radial growth for diameter increment for each 8” DBH (diameter at breast height) class, beginning at 0 – 8” DBH for each management (even-age or uneven-age) type. The average annual increment shall be added for each year according to the plot’s sample date.
- Height increment shall be based on regression curves for each management type (even-age or uneven-age) developed from height measurements from the same trees the

diameter increment data was obtained. The estimated height shall be determined using the regression estimators for the 'grown' diameters as described above.

Additional models will be allowed following approval of a state forestry authority (i.e. a state agency responsible for oversight of forests) who will acknowledge in writing that the model:

- Has been peer reviewed in a process that: 1) primarily involved reviewers with necessary technical expertise (e.g. modeling specialists in relevant fields of biology, forestry, ecology, etc.), and 2) was open and rigorous
- Is parameterized for the specific conditions of the Project Area
- Limits use to the scope for which the model was developed and evaluated
- Is clearly documented with respect to the scope of the model, assumptions, known limitations, embedded hypotheses, assessment of uncertainties, and sources for equations, data sets, factors or parameters, etc.
- Underwent a sensitivity analysis to assess model behavior for the range of parameters for which the model is applied
- Is reviewed at least every 10 years

B.2 Using models to forecast carbon stocks

The use of simulation models is required for estimating a Forest Project's baseline carbon stocks. Models may also be required to forecast actual carbon stocks expected under the Forest Project (e.g. in conjunction with determining expected harvesting volumes or in updating forest carbon inventories).

Inventory information from Appendix A must be incorporated into the simulation models to project carbon stocks over time. If a model has the ability to convert biomass to carbon, it must include all the carbon pools required by this protocol.

Projected baseline or actual carbon stocks must be portrayed in a graph depicting time in the x-axis and carbon tons in the y-axis. Baseline carbon stocks must be projected forward from the date of the Forest Project's offset project commencement. The graph should be supported with written characterizations that explain any annual changes in baseline carbon stocks over time. These characterizations must be consistent with the baseline analysis required in Section 6.

B.3 Modeling Requirements

A modeling plan must be prepared that addresses all required forecasting or updating of baseline and actual carbon stocks for the Forest Project. The modeling plan shall contain the following elements:

1. A description of all silviculture methods modeled. The description of each silviculture method will include:
    a. A description of the trees retained (by species groups if appropriate) at harvest.
    b. The harvest frequency (years between harvests).
    c. Regeneration assumptions.
2. A list of all legal constraints that affect management activities on the Project Area. This list must identify and describe the constraint and discuss the silviculture methods that will be modeled to ensure the constraint is respected.
3. A description of the site indexes used for each species and an explanation of the source of the site index values used.
4. A description of the model used and an explanation of how the model was calibrated for local use, if applicable.

Modeling outputs must include:

1. Periodic harvest, inventory, and growth estimates for the entire Project Area presented as total carbon tons and carbon tons per acre.
2. Harvest yield streams on modeled stands, averaged by silviculture method and constraints, which must include the period over which the harvest occurred and the estimated volume of wood removed.

Appendix F Determining a Value for Common Practice

Quantification Methodology

Forest Assessment Areas Introduction
Assessment areas are used to provide standardized regional data for offset project development. An assessment area is generally defined as a forest vegetation community that shares common environmental, economical, and regulatory attributes. The Forest Offset Protocol Resources section of ARB's website provides data, by assessment area, necessary to calibrate and/or implement project accounting, including:

- Common Practice – The average carbon stocks (metric tons) of the above ground portion of live trees on private lands. The average carbon stock is the result of the suite of management activities within the assessment area. The common practice value is the extent to which improved forest management projects can receive credit for avoided emissions. (See Section 6.2.)
- Diversity Index – The maximum amount (by carbon percentage) of any one native species allowed within a project. (See Section 3.8.2.)
- The rotation length commonly used in the assessment area and the value of harvest for incorporating in a financial test for reforestation projects (see Appendix E).
- The mill efficiency used for calculating wood products (see Appendix C).
- The wood product classes generated for calculating wood products values (see Appendix C).

Defining Assessment Areas

The U.S. Forest Service Forest Inventory and Analysis Program (FIA) is the basis for development of assessment areas. The FIA program collects data on U.S. forests using an extensive array of coordinated sample plots throughout the nation. Together the plots comprise a national inventory system designed to assess the state of U.S. forests on an ongoing basis. The hierarchical and spatial nature of FIA data make it possible to group sample field plots by geographical location. FIA plots are assigned an attribute referred to as 'forest type' that identifies the dominant vegetation present at the plot. Forest Types were combined into forest communities following a process described further below. An assessment area is a forest community within a defined geographical unit. The geographical units are discussed below.

Ecosections are spatial units and can be mapped. The geographical units that contain assessment areas are based on individual ecosections or combined ecosections (called supersections). Supersections were created in order to stratify the plots into high site class and low site class (where possible) and to increase the statistical reliability of the common practice estimates derived for each assessment area. The combination of ecosections into supersections only occurred where adjacent ecosections share similar environmental, economic, and regulatory attributes. Ecosections are combined into supersections if:

1. The ecosections are adjacent to each other.
2. They share a similar distribution of plots by forest types, which indicates that the ecosections share similar climate, elevation, and other environmental variables.
3. The economics of forest management are similar between the ecosections. The criteria considered to determine economic commonality between ecosections include forest product

generation, transportation networks, forest product mill types, and wood products markets. This was based on professional knowledge of regional timber markets.

4. Regulations between ecosections are relatively homogeneous across ecosection boundaries. Ecosections are not combined into supersections in cases where forest practice regulations between adjoining administrative units are known to be markedly different.

The Forest Service computed the statistics for the combined forest types aggregated at the supersection level and disaggregated at the ecosection level. The statistics are reported on a per acre basis and include board foot volume, basal area (square feet), above ground carbon tons, and the sampling error. Ecosections were not combined into supersections if the aggregation changed average standing carbon stocks of any assessment areas by more than 10%, indicating that there are environmental, economic or regulatory differences affecting the forest stocks within these communities.

The aggregation of forest types into forest communities that define assessment areas is based on the natural forest communities found within the ecosections rather than the presence of a single dominant species as in plantation management. As an example, the Northwest Coast Range contains many forest holdings of intensively managed Douglas-fir forests, yet the natural forest community contains many other species such as western hemlock, Sitka spruce, and red alder, among others. The plots used to define the assessment area, as well as the common practice statistic, are the entire set of plots found in the natural forest community. No effort is made to isolate assessment areas based on the existence of plantations. Successional stage, including the presence of shade tolerance species, and management influence on species prevalence is not a basis for stratifying distinct communities. The Forest Offset Protocol Resources data on ARB's webpage displays the associations of forest species (forest types) and assessment areas for all of the ecosections and supersections. Figure F.1 summarizes conceptually the methodology for delineating assessment areas.

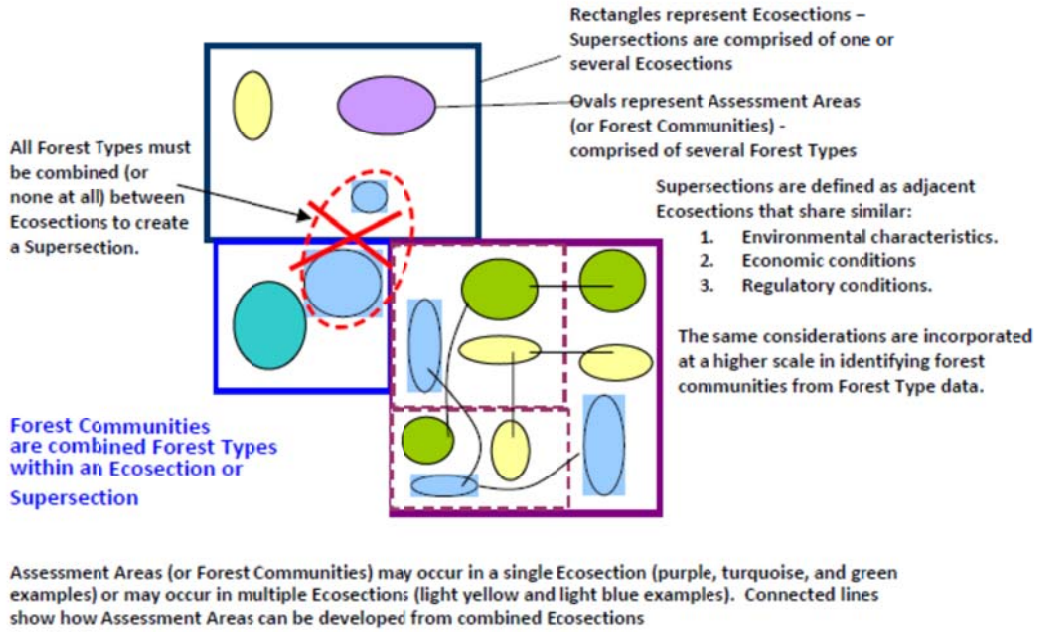

Figure F.1 Schematic of Process to Define Assessment Areas

Determining a Value for Common Practice

The following requirements and methods provide step by step instructions for determining the appropriate Common Practice value for an Improved Forest Management project based on its geographic location and boundaries.

1. **Determine the Geographic Ecosection(s) or Supersection(s) Within Which the Project Area is Located**
   The Offset Project Operator or Authorized Project Designee must determine the geographic Ecosection(s) or Supersection within which the Project Area is located by consulting maps of Supersections. These maps can be downloaded from the Forest Offset Protocol Resources section of ARB's website in either a .pdf format or a Geographical Information System (GIS) shapefile.

2. **Determine the Acreage of the Project Area That Falls Within Each Assessment Area Contained in the Ecosection(s) or Supersection(s)**

   Ecosections and Supersections may consist of one or many Assessment Areas. Assessment Areas are groupings of tree species that are commonly found in association with each other, as in a vegetation community. Assessment Areas are not mapped since the geographic locations of forest communities vary based on highly resolute environmental variables. To determine which Assessment Areas are included within the Project Area, compare the tree species in the Project Area to the species list associated with each Assessment Area in the project's Ecosection(s) or Supersection(s) (identified in Step 1). Tree species information must be looked up using the most current Assessment Area Data File from the Forest Offset Protocol Resources section of ARB's website. The minimum mapping resolution for vegetation communities is 20 acres. Therefore, any contiguous area 20 acres or greater within the Project Area that consists of a separate vegetation community must be independently mapped.

3. **Where Necessary, Stratify Project Area Acres According to Whether They Are High or Low Site Class**

   The Assessment Area Data File on the Forest Offset Protocol Resources section of ARB's website provides data for each Assessment Area by high, low, or all site classes. For Assessment Areas where data are attributed for high and low site classes, the Offset Project Operator or Authorized Project Designee must further stratify the Project Area and identify the acreage that falls within each site class.

   The computation of the statistics in the Assessment Area Data File (on a per acre basis) for board foot volume, basal area (square feet), and CO_2 equivalent was done for high and low site classes wherever the FIA plots were available in adequate quantity to achieve a sampling error of 18 percent or less. The board foot volume and basal area statistics are presented only to elucidate comparisons to the Common Practice (CO_2 equivalent) statistic. Board foot volume and basal area statistics are not used for other purposes in the protocol.

   For stratification purposes, a "high" site class means a Timber Site I or II (Forest Service Types I, II, and III). A low site class means a Timber Site III, IV, or V (Forest Service Types IV – VII). Landowners must determine the portion of the Project Area that is in each site class for each Assessment Area using soils data from a state or federal

agency, direct site class data from a state or federal agency, attestation from a state forester, or through field analysis. Whatever method is used, documentation of the analysis must be provided to the verifier at the project's initial verification.

4. **Identify the Common Practice Statistic Associated with Each Assessment Area and Site Class Stratum**

   For each Assessment Area and Site Class within the Project Area, identify the appropriate Common Practice statistic from Assessment Area Data File. The value displayed in the Assessment Area Data File indicates CO_2 equivalent metric tons per acre in the above ground portion (bole, bark, top and branches) of live trees.

   If data for an Assessment Area are provided for both high and low site classes, and a Offset Project Operator or Authorized Project Designee is unable or unwilling to stratify the Project Area into site classes using an acceptable method described above, then the high site-class Common Practice statistic must be used for all acres within the Assessment Area.

5. **Determine a Value for Common Practice for the Entire Project Area**

   Determine a single Common Practice value for the entire Project Area by calculating the average of the Common Practice statistics for each Assessment Area and site class, weighted by the number of acres of each Assessment Area and site class within the Project Area. See Table F1 for an example.

Table F1. Example of Common Practice Statistic Calculation

Ecosection(s) /Supersection(s)	Assessment Area	Site Class	Acres	Common Practice (Metric Tons CO2-e)
Name the Ecosection(s)/Supersection(s) the project is found within.	*Identify the Assessment Areas the project is in. If the project is in more than one site class for an Assessment Area, enter the Assessment Area twice*	*Enter the Site Class Value*	*Acres for each Assessment Area-Site Class Combination*	*Enter the Value from the most current Assessment Area Data File*
Adirondacks & Green Mountains	Adirondacks & Green Mountains Northeast Conifers	High	1,000	91.8
Adirondacks & Green Mountains	Adirondacks & Green Mountains Northeast Conifers	Low	100	84.4
Adirondacks & Green Mountains	Adirondacks & Green Mountains Northern Hardwood	High	50	102.8
Total Acres / Weighted Average Common Practice			**1,150**	**91.6**