



Final CCBA Project Verification Report

“RESTORING A FOREST LEGACY AT UPPER OUACHITA NATIONAL WILDLIFE REFUGE”

**THE CONSERVATION FUND
5 JULY 2016**

Verification Conducted by:

SCS Global Services
Greenhouse Gas Verification Program
2000 Powell St. #600, Emeryville, CA 94608 USA
(Tel.) 1.800.326.3228 • (Fax) 510.236.8598
<http://www.scsglobalservices.com/>

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Appendix A CCBA Compliance Checklist

1. Introduction

This report presents the findings of an audit conducted by SCS Global Services (SCS), to confirm that the “Restoring a Forest Legacy at Upper Ouachita National Wildlife Refuge project (“the project”) conforms to the Climate, Community and Biodiversity Project Design Standards (Second Edition). SCS has been accredited by the Climate, Community & Biodiversity Alliance (CCBA) to perform such verification audits.

1.1. Objective

The verification objective is an independent assessment by SCS of the proposed project activity against all defined criteria as defined by the Climate, Community & Biodiversity Alliance (CCBA). Verification has resulted in a conclusion by SCS as to whether the project activity continues to be compliant with the Climate, Community & Biodiversity (CCB) Standards.

1.2. Scope and Criteria

The verification audit assessed the implementation of the project during the monitoring period from 19 January 2011 – 15 April 2016.

The project was assessed against all 14 required criteria of the CCB Standards Second Edition. In addition, the project was assessed against the optional criteria GL3, Exceptional Biodiversity Benefits. The verification audit was carried out as specified in the guidance document “Rules for the use of the Climate, Community & Biodiversity Standards” (December 2013).

1.3. Level of Assurance

The level of assurance is reasonable.

2.0 Verification Process

2.1. Method and Criteria

The verification was performed through a combination of document review, interviews with relevant personnel and on-site inspections.

2.2. Document Review

The project implementation report (PIR; V1, dated 15 April 2016) and the monitoring plan (Version 5.0, dated 12 July 2012) were carefully reviewed for conformance to the verification criteria. Where documents underwent multiple iterations to account for revisions, only the most up to date version is listed below.

In addition to the above documents, the following written documents (e.g., reports, memos, land deeds and titles) were reviewed to ensure conformance of the project to the verification criteria:

Document (Date)	Date Reviewed
Validated Project Description Documentation (PDD; August 2011)	Throughout audit
Validation report (10 August 2011)	Throughout audit
Exhibit A_MOU	January 2016
Exhibit B_USFWS Carbon Sequestration Accomplishments Report 2009-2013	Throughout audit
Exhibit C_Wetlands publication	Throughout audit
Mollicy GoZero Survival	Throughout audit
TCF_GoZero_ClimateMonitoringPlan_forWeb_5_11_11	Throughout audit
Exhibit D_Media Support	Throughout audit
Exhibit E_Relevant Legal Mandates	Throughout audit
Exhibit F_Journal of Wetlands	Throughout audit
TCF_CCB_Upper_Ouachita_NWR_Monitoring_Update_Biodiversity_7_12_12	Throughout audit
TCF_CCB_Upper_Ouachita_NWR_Monitoring_Update_Community_7_12_12	Throughout audit
TCF_GoZero_ClimateMonitoringPlan_Redacted_7_12_12	Throughout audit

2.3. Interviews

Interviews constituted an important component of the audit process. The following personnel associated with the project proponent and/or implementing partners were interviewed. The phrase “throughout audit” under “Date(s) Interviewed” indicates that the individual in question was interviewed on multiple occasions throughout the audit process.

Individual	Affiliation	Date(s) Interviewed
Carrie Gombos	The Conservation Fund	Throughout audit
Lauren Fety	The Conservation Fund	Throughout audit
Brett Hortman	USFWS	24 May 2016
Michael Thompson	The Conservation Fund	Throughout audit
Chris Foster	USFWS	24 May 2016
Gypsy Hanks	USFWS	24 May 2016

In addition, the following individuals who were not associated with the project proponent and/or implementing partner provided information regarding the project.

Individual(s)	Date(s) Interviewed
John Hanks – Community member	24 May 2016

2.4. Site Inspections

Following the initial desk review, the audit team performed onsite inspections on 24 May 2016. The primary verification activities undertaken during this visit were as follows:

- Interview representatives of the project proponent and all implementing partners listed in Section 1.1.1 of the project description regarding the implementation status of the project;
- Visit reforestation sites to confirm that the project is in line with the expected project benefits;
- Review data management systems to confirm that monitoring is taking place as described in the respective monitoring plans.

2.5. Resolution of Any Material Discrepancy

Any potential or actual material discrepancies identified during the assessment process are resolved through the issuance of findings. The types of findings issued by SCS are characterized as follows:

Non-Conformity Report (NCR): An NCR signified a material discrepancy with respect to a specific requirement. This type of finding could only be closed upon receipt by SCS of evidence indicating that the identified discrepancy had been corrected. Resolution of all open NCRs was a prerequisite for issuance of a verification statement.

New Information Request (NIR): An NIR signified a need for supplementary information in order to determine whether a material discrepancy existed with respect to a specific requirement. Receipt of an NIR did not necessarily indicate that the project was not in compliance with a specific requirement. However, resolution of all open NIRs was a prerequisite for issuance of a verification statement.

Opportunity for Improvement (OFI): An OFI indicated an area that should be monitored or ideally, improved upon. OFI's were considered to be an indication of something that could become a non-conformity if not given proper attention, and were sometimes issued in the case that a non-material discrepancy was identified. OFIs were considered to be closed upon issuance.

No findings were issued during this verification event.

2.6. Resolution of Stakeholder Comments

The public comment period for the PIR extended from 21 April 2016 – 21 May 2016. No comments regarding the PIR were submitted to the CCBA.

3.0 Verification Findings

3.1. General Section

The General Section of the CCB Standards addresses original conditions in the project area baseline projections, project design and goals, management capacity and best practices, and legal status and property rights.

3.1.1. G1 – Original Conditions in the Project Area

The criterion requires information to be provided with respect to conditions in the project area and project zone prior to the start date (i.e., “original conditions”), but does not require updated information to be provided with respect to such conditions throughout project implementation. Whereas the project provides information in the current PIR, the project is considered to comply with the criterion on the basis of the description that was provided within the validated PDD. A summary description of original conditions in the project zone is provided in the PIR, and the reader is appropriately referred to the PDD for a more thorough treatment.

3.1.2. G2 – Baseline Projections

The criterion requires “description of expected conditions in the project zone in the absence of project activities”. As with the “original conditions” of G1, it is not possible to provide updated information on the baseline scenario over time, as the baseline scenario must, inherently, be described ex ante. Therefore, the project is considered to comply with the criterion on the basis of the description that was provided within the validated PDD.

3.1.3. G3 – Project Design and Goals

The validated PDD describes three different project activities, and the PIR describes to what extent these activities were implemented during the monitoring period. The audit team’s comments with respect to each activity are as follows:

Site Preparation and Planting

While onsite, the audit team visited the largest planting site on the Upper Ouachita National Wildlife Refuge (NWR). Due to the productive soils in the region, the majority of the surviving trees planted were easy to locate. The obvious row nature of the planting allowed the audit team to confirm that the plantings had taken place as described in the PDD. In addition, given the high growth rates in the reforestation sites, the audit team was also able to recognize the species and confirm that these were the species originally planned for the project.

Survival Checking

The audit team was able to confirm that the survivorship surveys were conducted as described in the PIR. Whereas, the timing of the site visit (spring) did not allow for a quantitative comparison of survival results, the audit team was able to ascertain that a majority of the trees were indeed living and thus confirmed the results of the survivorship in the PDD (72% survivorship) with a reasonable level of assurance.

Carbon Monitoring

Given the timing of the site visit, carbon monitoring had yet to be conducted. A further discussion of carbon monitoring is provided in Section 3.2 of this report.

Interviews with project personnel have revealed that the information provided in the PDD in response to G3.3, G3.4, and G3.5 continues to be relevant to the project.

The audit team was provided with and reviewed the Upper Ouachita and Handy Brake Comprehensive Conservation Plan (CCP) and was able to confirm that the plan includes specific language referencing the Upper Ouachita NWR. The audit team agrees that the language in the CCP is comprehensive enough to ensure the maintenance of the high conservation values listed in the PDD.

The measures taken to enhance the project benefits beyond the project lifetime are fully described in the PDD. The audit team was provided with the MOU between The Conservation Fund (TCF) and the USFWS, which confirmed that the expected project benefits are protected by this agreement in perpetuity.

Discussions with project personnel and stakeholders have confirmed that the planned measures to continue communication and consultation between project managers and all community groups, as required by G3.8 and described in the PDD, have generally been implemented. While on site the audit team interviewed a member of the local community who confirmed that any activities or news about the project are posted on the refuge website.

In accordance with the CCB Standards, the CCBA public comment period was held from 21 April 2016 – 21 May 2016. During this time, the PIR was posted on the CCBA website for comment. As indicated to the audit team during the site visit, the CCBA public comment period was posted at the Upper Ouachita NWR along with hard copies of the PIR. Therefore, the project can be said to have complied with G3.9.

The audit team held interviews with members of the Upper Ouachita NWR, who confirmed that the grievance resolution process described in the PIR and PDD is described accurately and currently in place. The audit team is familiar with this process from previous work with the USFWS and agrees that the process meets the requirements of section G3.10 of the Standards.

As the project is funded through donor funding, the implementation of the project activities in itself confirms that the financial mechanisms are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits. Given that the project area is owned and managed by the USFWS, the audit team has a reasonable level of assurance that the monitoring performed to date will continue over the life of the project.

In summary, the project remains in overall conformance with G3. Although not all project activities have been implemented at this point in the project life, the audit team can affirm that the project has generated net positive climate, community and biodiversity benefits compared to the baseline scenario, and therefore the project can be successfully verified in accordance with the CCB Standards rules.

3.1.4. G4 – Management Capacity and Best Practices

As a result of on-site interviews with project personnel, the audit team was able to confirm that the roles of the project proponent and implementing partners continue to be as described in the PDD. The audit

team agrees that the management team possesses the key technical skills necessary to successfully undertake all project activities, including forest protection, forest biomass inventory, community surveys and project activity design. All of the representatives of the management team with whom the audit team spoke were competent in their respective areas of expertise. One change to the management team took place since the initial validation. The monitoring services previously provided by Environmental Synergy Inc. (ESI) are now being provided by TerraCarbon LLC. The audit team agrees that the wide range of experience held by TerraCarbon LLC is adequate for continuing to meet the requirements of the Standards.

The audit team reviewed the biological carbon sequestration accomplishments report and confirmed that the information provided is adequate for increasing awareness and building capacity for this project, as well as other potential projects.

The audit team reviewed the USFWS employee policies and confirmed that the project is required to follow all workers' rights laws and regulations. As the project is managed by a government institution, the audit team has no reason to believe that there were any changes to the adherence of laws since project validation. In addition, while onsite, the audit team was provided with evidence that all employees are properly trained and informed of potential safety threats of employment.

The audit team confirmed that the project is being managed by USFWS and has been implemented to date by a combination of donor funding and refuge staff. Given that the USFWS is a government institution in good standing (i.e., refuge lands continue to increase across the U.S.) that funding is adequate to continue the project activities.

In summary, the project remains in overall conformance with G4.

3.1.5. G5 – Legal Status and Property Rights

The audit team confirmed that the project area is owned and managed by the U.S. Government and no changes have occurred since project implementation.

3.2. Climate Section

3.2.1. CL1 – Net Positive Climate Impacts

As confirmed at validation, the validated PDD contains an ex-ante estimate of the expected climate impact of the project within the project area. As set out in guidance document "Rules for the use of the Climate, Community & Biodiversity Standards", the major reason why this estimate would need to be re-assessed are if "there has been a substantial change in the expected climate, community, or biodiversity impacts of the project, for example, a substantial change in the type of impacts, or the affected group" (page 26), in which case a new validation audit would be necessitated. There have been no changes to the ex-ante estimates since validation. Therefore, the ex-ante estimate described in the validated PDD is not within the scope of the verification audit described in this report.

3.2.2. CL2 – Offsite Climate Impacts ('Leakage')

As confirmed at validation, the validated PDD contains an ex-ante estimate of the expected climate impact of the project outside of the project area. As set out in guidance document "Rules for the use of the Climate, Community & Biodiversity Standards", the major reason why this estimate would need to be re-

assessed is if “there has been a substantial change in the expected climate, community, or biodiversity impacts of the project, for example, a substantial change in the type of impacts, or the affected group” (page 26), in which case a new validation audit would be necessitated. Although some impacts to the expected climate benefits of the project were noted during the site visit, as described in Section 3.1.3 above, these impacts are not considered “substantial” by the audit team. There have been no changes to the ex-ante estimates since validation. Therefore, the ex-ante estimate described in the validated PDD is not within the scope of the verification audit described in this report.

3.2.3. CL3 – Climate Impact Monitoring

As indicated in the validation report issued by SCS, the full climate monitoring plan was completely accepted at validation. The full climate monitoring plan does not require non-CO2 greenhouse gases to be monitored. The monitoring plan, in turn, references a Standard Operating Procedure for the collection of biomass inventory data. This Standard Operating Procedure contains detailed procedures for measuring all of the carbon pools listed in the monitoring plan. The measurement techniques are well-described and consistent with standard inventory best practices for the chosen sampling methods. Whereas only survivorship data has been collected to date, it was indicated to the audit team that a complete inventory will be performed in 2016 in accordance with the monitoring plan.

The audit team can confirm that the monitoring as reported in the PIR has proceeded in accordance with the monitoring plan, and that the project has resulted in net climate benefits over the duration of the monitoring period.

3.3. Community Section

3.3.1. CM1 – Net Positive Community Impacts

As confirmed at validation, the validated PDD contains an ex-ante estimate of the expected community impact of the project within the project area. As set out in guidance document “Rules for the use of the Climate, Community & Biodiversity Standards”, the major reason why this estimate would need to be re-assessed are if “there has been a substantial change in the expected climate, community, or biodiversity impacts of the project, for example, a substantial change in the type of impacts, or the affected group” (page 26), in which case a new validation audit would be necessitated. No changes to the expected impacts have occurred since validation. Therefore, the ex-ante estimate described in the validated PDD is not within the scope of the verification audit described in this report.

3.3.2. CM2 – Offsite Stakeholder Impacts

As confirmed at validation, the validated PDD contains an ex-ante estimate of the expected community impact of the project outside of the project area. As set out in guidance document “Rules for the use of the Climate, Community & Biodiversity Standards”, the major reason why this estimate would need to be re-assessed are if “there has been a substantial change in the expected climate, community, or biodiversity impacts of the project, for example, a substantial change in the type of impacts, or the

affected group” (page 26), in which case a new validation audit would be necessitated. No changes to the expected impacts have occurred since validation. Therefore, the ex-ante estimate described in the validated PDD is not within the scope of the verification audit described in this report.

3.3.3. CM3 – Community Impact Monitoring

The monitoring plan contains a full monitoring plan for monitoring of community impacts. The audit team agrees that the variables listed in the full monitoring plan will appropriately capture community impacts within the project area and also the wider project zone. The monitoring plan identifies the communities and other stakeholders to be monitored. The audit team was able to review the monitoring data provided by user groups, as users are required to fill out user use cards, as well as the reports from the gate surveys. Through review of these documents and interviews with project personnel, the audit team can confirm that the procedures described within the Standard Operating Procedures, and the monitoring plan itself, are appropriate to the task at hand.

Whereas, the audit team is unable to determine if visitor numbers are directly tied to the reforestation sites, interviews with project personnel and community members confirmed that the impacts of the reforestation activities are positive. Overall, the audit team can confirm that the monitoring as reported in the PIR has proceeded in accordance with the monitoring plan, and that the project has resulted in net positive community impacts over the duration of the monitoring period.

3.4. Biodiversity Section

3.4.1. B1 – Net Positive Biodiversity Impacts

As confirmed at validation, the validated PDD contains an ex-ante estimate of the expected biodiversity impact of the project within the project area. As set out in guidance document “Rules for the use of the Climate, Community & Biodiversity Standards”, the major reason why this estimate would need to be re-assessed is if “there has been a substantial change in the expected climate, community, or biodiversity impacts of the project, for example, a substantial change in the type of impacts, or the affected group” (page 26), in which case a new validation audit would be necessitated. No changes to the expected impacts have occurred since validation. Therefore, the ex-ante estimate described in the validated PDD is not within the scope of the verification audit described in this report.

3.4.2. B2 – Offsite Biodiversity Impacts

As confirmed at validation, the validated PDD contains an ex-ante estimate of the expected biodiversity impact of the project outside of the project area. As set out in guidance document “Rules for the use of the Climate, Community & Biodiversity Standards”, the major reason why this estimate would need to be re-assessed is if “there has been a substantial change in the expected climate, community, or biodiversity impacts of the project, for example, a substantial change in the type of impacts, or the affected group” (page 26), in which case a new validation audit would be necessitated. No changes to the expected

impacts have occurred since validation. Therefore, the ex-ante estimate described in the validated PDD is not within the scope of the verification audit described in this report.

3.4.3. B3 – Biodiversity Impact Monitoring

The monitoring plan contains a full monitoring plan for monitoring of biodiversity impacts. The audit team agrees that the variables listed in the full monitoring plan will appropriately capture changes in biodiversity within the project area and also the wider project zone. In accordance with the CCB Standards, the types of measurements, sampling method and frequency of measurement are identified. The audit team was provided with the data resulting from the biodiversity monitoring to date and confirmed that the results show positive diversity and richness as predicted.

The audit team can confirm that the monitoring as reported in the PIR has proceeded in accordance with the monitoring plan, and that the project has resulted in net biodiversity benefits over the duration of the monitoring period.

3.5. Gold Level Section

3.5.1. GL3 – Exceptional Biodiversity Benefits

The audit team was provided with evidence of the monitoring undertaken to monitor biodiversity in the project area. Whereas, the audit team was not able to observe the process or actual individual animals onsite, the audit team held an interview with April Simmons of the Louisiana National Heritage Program, who confirmed at least 30 individuals for the Crystal darter (vulnerable), the alligator snapping turtle (vulnerable), and the Arkansas oak (vulnerable). Moreover, the audit team can only agree that by increasing suitable habitat that the project is providing protection for such species.

A review of the IUCN Red List website (www.iucnredlist.org) on 6 June 2016 indicates that the Crystal darter, Alligator snapping turtle, and the Arkansas oak have a status of vulnerable (vu). Therefore, the audit team has reasonable assurance that the project continues to comply with GL3 through the vulnerability criterion.

4.0 CCB Verification Conclusion

Following completion of SCS's duly-accredited verification process, it is our opinion that the project conforms to the CCBA Climate, Community and Biodiversity Project Design Standards (Second Edition) at the Gold Level (see Appendix A).

5.0 Resolution of Verification Findings

Please see Section 3.1 of this report for descriptions of the types of findings. No Findings were issued during this verification event.

6.0 Appendix A

General Section

Conformance

G1.	Original Conditions in the Project Area (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G2.	Baseline Projections (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G3.	Project Design and Goals (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G4.	Management Capacity and Best Practices (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
G5.	Legal Status and Property Rights (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Climate Section

CL1.	Net Positive Climate Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CL2.	Offsite Climate Impacts (“Leakage”) (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CL3.	Climate Impact Monitoring (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Community Section

CM1.	Net Positive Community Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CM2.	Offsite Community Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
CM3.	Community Impact Monitoring (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Biodiversity Section

B1.	Net Positive Biodiversity Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
B2.	Offsite Biodiversity Impacts (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
B3.	Biodiversity Impact Monitoring (Required)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Gold Section

GL1.	Climate Change Adaptation Benefits (Optional)	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
GL2.	Exceptional Community Benefits (Optional)	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
GL3.	Exceptional Biodiversity Benefits (Optional)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

CCBA Verification Level Attained:

APPROVED (all requirements met)

GOLD (all requirements and also at least one optional Gold Level criterion met)

