

# CLIMATE COMMUNITY AND BIODIVERSITY STANDARDS

## PROJECT VERIFICATION REPORT

<b>Offset Project Name:</b>	Red River National Wildlife Refuge Restoration Initiative Natchitoches Parish, Louisiana, United States
<b>Project Proponent</b>	The Conservation Fund
<b>Verification Body:</b>	SCS Global Services (SCS)
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## **1.0 Executive Summary**

This report presents the findings of an assessment conducted by SCS Global Services (SCS), to verify the claim made by the Project Proponent, The Conservation Fund (the Fund), that the Project Implementation Report (PIR) of the Red River National Wildlife Refuge Restoration Initiative (Project) conforms to the Climate, Community and Biodiversity Project Design Standards, First Edition. In 2009, SCS assessed the Project against all required criteria of the CCB Standards and the PDD was validated at the Gold Level, fulfilling all eight of the optional criteria for the generation of exception climate, community and biodiversity benefits. The verification process consisted of a thorough desk review of Project documentation, including USFWS annual reports and monitoring plans. In addition, the audit team performed a site visit to visit portions of the Project area, conduct interviews with Project stakeholders, and evaluate the quality of the Project's management systems. The Project has been successfully verified by SCS.

### **1.1. Objective**

SCS will conduct an independent assessment of the implementation of the Project, in accordance with the validated design in the Project Design Document, to determine whether the Project has successfully generated net climate, community, and biodiversity benefits.

### **1.2. Assessment Scope**

The scope of the assessment was performed using the PDD, PIR and other project documentation, including public comments and monitoring information. The organizational and geographical boundaries of the Project shall consist of the project boundary as defined in the PDD.

### **1.3. Assessment Criteria**

The assessment was conducted against the following criteria:

- Climate, Community and Biodiversity Project Design Standards, First Edition ("CCB Standards")
- Rules for the use of the Climate, Community & Biodiversity Standards, Version 3, 12 December 2013 ("CCB Standards Rules")

The First Version of the CCB Standards requires conformance to 15 indicators in each of 4 categories: 1) General (6 criteria), 2) Climate (3 criteria), 3) Community (3 criteria), and 4) Biodiversity (3 criteria). In addition, applicants can achieve a higher level of validation (Silver or Gold) through the application of eight optional "point scoring" criteria. Silver level validation can be achieved by projects that conform to at least one of the "point scoring" criteria in three of the four sections. Gold level validation can be achieved by projects that conform to at least one of the "point scoring" criteria in each of the four sections and total at least 6 points.

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During verification, assessment of indicators that have not changed from the validated PDD is not required. The focus of the assessment is project implementation and impacts.

### **1.4. Level of Assurance**

SCS performed this assessment to determine whether there is a reasonable level of assurance that the PIR conforms to the relevant requirements of the verification criteria.

### **1.5. Summary Description of the Project**

*From The Conservation Fund's Project Implementation Report:*

The Red River NWR Restoration Initiative was designed to decrease the effects of climate change via carbon sequestration, restore Louisiana's bottomland hardwood forest and wetland ecosystem and create long-term community benefits in the form of recreational lands under the management of the US Fish and Wildlife Service (USFWS) – hunting, fishing, wildlife photography, wildlife observation, environmental education and environmental interpretation. The project presented a unique opportunity to restore native bottomland hardwood forests that will benefit fish and wildlife, enhance water quality along the Red River and surrounding waterways, create new areas for public recreation, and trap carbon dioxide.

On behalf of the US Fish and Wildlife Service, The Conservation Fund purchased a total of 1,173 acres of private, marginal agricultural land within the boundary of the Red River National Wildlife Refuge located in Natchitoches Parish in northern Louisiana. Using donations from its Go Zero® program, the Fund restored the entire acreage to its native bottomland hardwood forest habitat. Once restored, the land was conveyed to the US Fish and Wildlife Service as an addition to the Red River National Wildlife Refuge for long-term protection and stewardship. The carbon offsets that are generated and purchased from this project cannot be sold or banked for future offset purpose

### **1.6. Assessment Process**

The assessment process included the following steps:

- Initial client meeting and project orientation (via conference call);
- Completeness review of PIR and submission of documentation to the CCBA to commence the 30-day Public Comment Period.
- Review of Project documentation, including Project Implementation Report, Monitoring Plans, and USFWS annual reports.
- Site visit on 28 to 29 January 2014, that included:
  - Project overview by The Conservation Fund and U.S. Fish & Wildlife Service, Red River National Wildlife Refuge Staff
  - Meetings with project partners and supporters, including USFWS staff and Friends of the Red River NWR; and

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- Field trips that included: visit to the Project Area, observation of restoration sites, site reconnaissance of the NWR.
- Review of stakeholder comments;
- Further document review and draft report preparation;
- Technical review and approval of the draft report by SCS;
- Project proponent response to NCR, NIRs, and OFIs;
- Auditor review of NCRs, NIRs, OFIs, and final report preparation; and
- Technical review and approval of the final report by SCS.

**Table 1. Interviews Conducted During the Site Visit**

Participant	Affiliation
Carrie Gombos	The Conservation Fund
Jordan Golinkoff	The Conservation Fund
Alterra Hetzel	The Conservation Fund
Pat Stinson	US Fish and Wildlife Service, Red River National Wildlife Refuge
Chris Foster	US Fish and Wildlife Service, Red River National Wildlife Refuge
Gypsy Hanks	US Fish and Wildlife Service, Red River National Wildlife Refuge
Joe Saenz	US Fish and Wildlife Service, North LA NWR Complex
Lynn Stewart	Friends of Red River National Wildlife Refuge
Ron King	Friends of Red River National Wildlife Refuge

**1.7. Assessment Team**

**Lead Auditor: Christie Pollet-Young, Director, Greenhouse Gas Verification Program**

Ms. Pollet-Young is the Director of SCS’s Greenhouse Gas Verification Program with over 15 years of experience in forestry, ranging from forest ecology research, conservation planning, and carbon offset verification in both tropical and temperate climates. Prior to her tenure at SCS, Ms. Pollet-Young worked for the Smithsonian Institution’s Center for Tropical Forest Science where she oversaw a network of forest dynamics plots throughout the tropics and The Nature Conservancy of Peru where she developed an ecoregional plan for the conservation of the Peruvian montane forests. Ms. Pollet-Young completed a Master of Forest Science from Yale University and graduated with high honors from the University of California, Berkeley with a Bachelor of Science in Environmental Science, Policy and Management and a minor in forestry. Ms. Pollet-Young is a lead auditor with SCS who has participated in the assessment of over 40 forest carbon offset projects around the globe under the standards of the Air Resources Board, Climate Action Reserve, the Verified Carbon Standard, the American Carbon Registry, and the Climate, Community and Biodiversity Alliance. In addition, Ms. Pollet-Young is a VCS AFOLU expert in Improved Forest

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Management and Jurisdictional Nested REDD+, as well as a recipient of a CARROT award from the Climate Action Reserve.

Previously, Ms. Pollet-Young has participated in the assessment of several forest carbon projects in the bottomland forest type. Three of these projects were CCB assessments as a verification team member on three similar CCB restorations projects in USFWS National Wildlife Refuges developed by the Fund.

### **Technical Reviewer: Francis Eaton, Verification Forester, Greenhouse Gas Verification Program**

Mr. Eaton holds a Masters of Forest Science from the Yale School of Forestry and Environmental Studies and received his B.S. in Forestry from Northern Arizona University. The focus throughout his studies was forest management with emphases on sampling design and statistical analysis. He spent three years working collecting field data and completing data analysis on forest restoration projects with the Ecological Restoration Institute. His work experience also includes complete biophysical inventories and estimation of timber volume for two 3000 acre properties, as a forest consultant in northern New Mexico. During his time in New Mexico, Mr. Eaton worked with local communities to develop collaborative relationships aimed at reducing fire risk across the region. Mr. Eaton currently works as a Verification Forester for SCS and has completed forest carbon projects under the Verified Carbon Standard (VCS), the Climate Action Reserve (CAR), and the Climate, Community, and Biodiversity Alliance (CCBA). Moreover, Mr. Eaton is accredited by the California Air Resources Board as Lead Offset Verifier and is also certified by the Board in the US Forest Project and Urban Forest Protocols. He is also certified as Lead Verifier under the Climate Action Reserve.

## **1.8. Stakeholder Comments**

The Project Implementation Report (PIR) was posted on the CCBA website on 4 December 2013 and the public comment period extended through 3 January 2014. A second public comment period occurred between 31 January and 2 March 2014. One comment was received (see Appendix B).

The written comment was received from the following stakeholder:

- Lynn Stewart, Friends of Red River National Wildlife Refuge

## **2.0 Review of CCB Requirements**

This assessment report addresses each of the relevant CCBA indicators for verification. Below, the CCBA indicators are listed along with a description of the evidence that was considered. When assessing the conformance of each indicator to the CCB Standards, SCS may issue findings to the Project Proponent. These findings can include Non-Conformity Reports (NCRs), Opportunities for Improvement (OFIs) and New Information Requests (NIRs), compiled in Appendix C. In the case of non-conformance, a Non-Conformity Report stipulates the deficiency and its relation to the CCB

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protocol. NCRs indicate non-conformance at the indicator level that must be satisfied prior to Project verification. A New Information Request indicates when additional information is necessary to complete the assessment. An Opportunity for Improvement is often an indication of something that may become a non-conformity if not given proper attention. OFI's are considered by the audit team to be closed upon issuance, and a response to this type of finding is not necessary.

**2.1. General Section**

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

**2.1.1. G1 – Original Conditions at Project Site**

The original conditions at the project site before the project commences must be described. This description, along with projections (G2), will help determine the likely impacts of the project.

<b>G1.1</b> - The location of the project and basic physical parameters (e.g., soil, geology, climate).	This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.
Conformance: C	

<b>G1.2</b> - The types and condition of vegetation at the project site.	This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.
Conformance: C	

<b>G1.3</b> - Current carbon stocks at the project site(s), using methodologies from the Intergovernmental Panel on Climate Change's Good Practice Guidance (IPCC GPG) or other internationally approved methodologies (e.g., from the CDM Executive Board).	This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.
Conformance: C	

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<p><b>G1.4</b> - A description of communities located in and around the project area, including basic socioeconomic information (using appropriate methodologies such as the livelihoods framework).</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

<p><b>G1.5</b> - A description of current land use and land tenure at the project site. (See also G5).</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

<p><b>G1.6</b> - A description of current biodiversity in the project area and threats to that biodiversity, using appropriate methodologies (e.g., key species habitat analysis, connectivity analysis), substantiated where possible with appropriate reference material.</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

<p><b>G1.7</b> - A list of all IUCN Red List threatened species (which encompasses endangered and vulnerable species) and species on nationally recognized list (where applicable) found within the project boundary. (See also B1).</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

**2.1.2. G2 – Baseline Projections**

An analysis of projected land-use trends is necessary to predict likely on-site changes without implementation of a project. This “without-project” future land-use scenario enables comparison of the project’s likely impacts with what would otherwise have occurred.

The project proponents must develop a defensible and well-documented "without-project" future land-use scenario and baseline projections, including the following information:

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<p><b>G2.1</b> - Description of the most likely land-use scenario in the absence of the project, identifying whether the scenario assumes that existing laws or regulations would have required that project activities be undertaken anyway.</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

<p><b>G2.2</b> - A projection of future carbon stock changes in the absence of the project, based on the land-use scenario described above. The timeframe for this analysis can be either the project lifetime (see G3) or the project accounting period, whichever is more appropriate. If there is evidence that non-CO2 greenhouse gas (GHG) emissions such as CH4 or N2O are more than 15% of the baseline GHG fluxes at the project site (in terms of CO2 equivalents), they must be estimated.</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

<p><b>G2.3</b> - Description of how the “without-project” scenario would affect local communities in the project area.</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

<p><b>G2.4</b> - Description of how the “without-project” land-use scenario would affect biodiversity in the project area.</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

<p><b>G2.5</b> - Description of how the “without-project” land-use scenario would affect water and soil resources. (See also B5).</p>	<p>This indicator was assessed during validation and remains unchanged throughout the life of the project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

**2.1.3. G3 – Project Design and Goals**

The project must be described in sufficient detail so that a third-party can adequately evaluate it. Projects that operate in a transparent manner enable stakeholders and outside parties to contribute more effectively to the project.

The project proponents must:

<b>G3.1</b> - Provide a description of the scope of the project and a summary of the major climate, community and biodiversity goals.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed during the site visit and through interviews with the Project Proponent and Refuge staff.
Conformance: C	

<b>G3.2</b> - Describe each major project activity (if more than one) and its relevance to achieving the project’s goals.	The project monitoring has changed since the PDD was validated. This change is discussed in greater detail in CL3. Otherwise, it was confirmed through interviews with the Fund and USFWS staff that there have been no other changes to Project activities or goals.
Conformance: C	

<b>G3.3</b> - Provide a map identifying the project location, where the major project activities will occur, and geo-referenced boundaries of the project site(s).	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed during the site visit and through interviews with the Project Proponent and Refuge staff.
Conformance: C	

<b>G3.4</b> - Provide a timeframe for the project’s duration and the rationale used for determining the project lifetime. If the accounting period for carbon credits differs from the project lifetime, explain.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed during the site visit and through interviews with the Project Proponent and Refuge staff.
Conformance: C	

<b>G3.5</b> - Identify likely risks to climate, community and biodiversity benefits during the project lifetime. Outline measures that the project plans to undertake to mitigate these risks.	During the verification, the risk of impacts to the Project Area from oil and gas development was discussed. Such development was observed within the Red River NWR near the headquarters, but not within the Project Area. Additionally, the 2009 Annual Narrative Refuge stated that natural gas wells and related activities are “a regular part of
Conformance: C	

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	managing Red River NWR.” A NIR was issued and discussions were held with the Project Proponent and NWR staff about possible mitigation activities. The revised PIR adequately addresses this issue. The Project continues to be in conformance with the requirements of this indicator.
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<b>G3.6</b> - Document and defend how local stakeholders have been or will be defined.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification.
Conformance: C	

<b>G3.7</b> - Demonstrate transparency by: making all project documentation publicly accessible at, or near, the project site; only withholding information when the need for confidentiality is clearly justified; informing local stakeholders how they can access the project documentation; and by making key project documents available in local or regional languages, where applicable.	The Project Implementation Report was made publicly available through several methods. The PIR was available onsite at the Refuge headquarters as well as virtually through the Project Proponent’s website. In addition, the Refuge and the Friends of the Red River NWR Facebook pages provided links to enable the public to access the PIR and to submit public comments to the CCBA. The verifier confirmed that the Project documentation was available through each of these media.
Conformance: C	

**2.1.4. G4 – Management Capacity**

The success of a project depends upon the competence of the implementing management team.

The project proponents must:

<b>G4.1</b> - Document the management team’s experience implementing land management projects. If relevant experience is lacking, the proponents must demonstrate how other organizations will be partnered with to support the project.	Since the PDD was validated, one of the Project stakeholders, Environmental Synergy Inc. (ESI) was dissolved in Fall 2010. ESI had been responsible for planting and assisting with monitoring activities. Since all of the planting occurred by February 2010, a new entity, TerraCarbon LLC, was brought in to assist the Project Proponent with monitoring. SCS confirmed through interviews with the Project Proponent that TerraCarbon employs many of the former ESI field staff and carbon analysts so the institutional knowledge will be maintained for each of the five bottomland hardwood restoration projects managed by the Project Proponent. Moreover, TerraCarbon was determined to have the
Conformance: C	

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	relevant experience and background to support the Project Proponent with monitoring activities. Thus, the Project continues to be in conformance with the requirements of this indicator.
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<b>G4.2</b> - Demonstrate that management capacity is appropriate to the scale of the project.	SCS confirmed through interviews with the Fund and USFWS staff members that the management capacity is appropriate to the scale of the Project.
Conformance: C	

<b>G4.3</b> - Document key technical skills that will be required to successfully implement the project and identify members of the management team or project partners who possess the appropriate skills.	As discussed in the validated PDD, the technical skills of the Project team are sufficient to successfully implement the restoration project. This assessment was corroborated again during the verification site visit. SCS is familiar with the skillsets of the key Project stakeholders having witnessed their experience while assessing other carbon offset projects.
Conformance: C	

<b>G4.4</b> - Document the financial health of the implementing organization(s).	The Fund's 2011 and 2012 tax returns were reviewed to provide sufficient evidence of the Project Proponent's financial health. The Project is in conformance with the requirements of this indicator.
Conformance: C	

**2.1.5. G5 - Land Tenure**

There should be no significant land tenure disputes in the project area, or the project should fundamentally help to resolve these tenure issues.

Based on information about current land tenure provided in G3, the project proponents must:

<b>G5.1</b> - Guarantee that the project will not encroach uninvited on private property, community property, or government property.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed during the site visit and through interviews with the Project Proponent and Refuge staff.
Conformance: C	

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<b>G5.2</b> - Guarantee that the project does not require the relocation of people, or any relocation is 100% voluntary and fundamentally helps resolve land tenure problems in the area.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed during the site visit and through interviews with the Project Proponent and Refuge staff.
Conformance: C	

<b>G5.3</b> - Describe potential “in-migration” of people from surrounding areas, if relevant, and explain how the project will respond.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed during the site visit and through interviews with the Project Proponent and Refuge staff.
Conformance: C	

**2.1.6. G6 - Legal Status**

The project must be based on a solid legal framework (e.g., appropriate contracts are likely to be in place) and the project must seek to satisfy applicable planning and regulatory requirements.

During the project design phase, the project proponents should communicate early on with relevant local, regional and national authorities and allow adequate time to earn necessary approvals. The project design should be flexible to accommodate potential modifications that may arise to secure regulatory approval.

The projects proponents must:

<b>G6.1</b> - Guarantee that no laws will be broken by the project.	The project activities were not designed to, nor have they been implemented, in a manner, which will break laws. This was confirmed through interviews with representatives of the Refuge staff and the Fund as well as through a review of the Refuge’s annual narrative reports since 2009.
Conformance: C	

<b>G6.2</b> - Document that the project has, or expects to secure, approval from the appropriate authorities.	The Project continues to maintain the approval and strong support among all of the Project stakeholders, including the USFWS who is responsible for approval of Project activities on the Refuge. This was confirmed through interviews with Refuge staff and the Project Leader for the North Louisiana NWR Complex. A Memorandum of Understanding between the Fund and the USFWS was also renewed in 2010 which demonstrates the two parties’ continuing commitment to the Project.
Conformance: C	

**2.1.7. G7 - Adaptive Management for Sustainability**

Adaptive management is a formal, systematic, and rigorous approach to learning from the outcomes of management actions, accommodating change and improving management. It involves synthesizing existing knowledge, exploring alternative actions and making forecasts about their outcomes.

Adaptive management is based upon the premise that ecosystems and social systems are complex and inherently unpredictable. Adaptive management views land management actions as learning opportunities and as potential experiments for systematically testing assumptions and identifying adjustments that could benefit the project. It enables a project to evolve to meet changing or unanticipated needs, and can help ensure that the project realizes its goals over the long term.

The projects proponents must:

<p><b>G7.1</b> - Demonstrate how management actions and monitoring programs are designed to generate reliable feedback that is used to improve project outcomes.</p>	<p>The PIR describes how the umbrella monitoring and CCP revision allows the Project Proponent to engage in adaptive management with respect to Project implementation activities. The umbrella monitoring designed by TerraCarbon was reviewed; however, there has been no CCP revision since the Project was validated. Through interviews with the USFWS and the Refuge staff, it is apparent that the Project is well managed and adept at addressing the feedback generated by the Project. During the site visit, the Project Proponent repeatedly demonstrated how they are able to collaboratively work with Refuge staff to improve Project outcomes.</p>
<p>Conformance: C</p>	

<p><b>G7.2</b> - Have a management plan for documenting decisions, actions and outcomes and sharing this information with others within the project team, so experience is passed on rather than being lost when individuals leave the project.</p>	<p>The PIR addresses how the Fund stores and archives Project files to ensure that an institutional knowledge is maintained for the Project. This data storage procedure was discussed and verified during the site visit through interviews with the Project Proponent. Similarly, the Refuge produces an annual report and the verification team reviewed these reports for each year since the Project start in 2010.</p>
<p>Conformance: C</p>	

<p><b>G7.3</b> - Demonstrate how the project design is sufficiently flexible to accommodate potential changes and that the project has a defined process in place to adjust project activities as needed.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Nonetheless, the audit team interviewed Project stakeholder during the site visit and confirmed that the defined process described in the PDD is still in effect.</p>
<p>Conformance: C</p>	

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<p><b>G7.4</b> - Demonstrate an early commitment to the long-term sustainability of project benefits once initial project funding expires. Potential activities may include: designing a new project that builds on initial project outcomes; securing payments for ecosystem services; promoting micro-enterprise; and establishing alliances with organizations or companies to continue sustainable land management.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Nonetheless, the audit team interviewed Project stakeholders during the site visit who confirmed their commitment to the long-term sustainability of Project benefits beyond the Project crediting period through the conveyance of the restored bottomland hardwood forest to the Refuge.</p>
<p>Conformance: C</p>	

**2.1.8. G8 - Knowledge Dissemination**

Field-based knowledge can be of value to other projects. If actively disseminated, this information can accelerate the adoption of innovative practices that bring benefits both globally and locally.

The project proponents must:

<p><b>G8.1</b> - Describe how they will document the relevant or applicable lessons learned.</p>	<p>The PDD states that the Project Proponent will document the lessons learned from the Project via the Fund’s website. The verifier reviewed the Fund’s website and found that this information was available as described.</p>
<p>Conformance: C</p>	

<p><b>G8.2</b> - Describe how they will disseminate this information in order to encourage replication of successful practices. Examples include: undertaking and disseminating research that has wide-reaching applications; holding training workshops for community members from other locales; promoting “farmer to farmer” knowledge-transfer activities; linking to regional databases; and working with interested academic, corporate, governmental or non-governmental organizations to replicate successful project activities.</p>	<p>The PIR states that the lessons learned will be disseminated through various methods. As mentioned in G 8.1, one method for dissemination is through the Fund’s website. Another is through an upcoming publication of the USFWS about carbon offset projects in which the Project is featured as a case study. This method was verified through conversations with the Fund and Refuge staff. Another method is through the publication of a journal article in Wetlands about the research used to develop the climate monitoring plan for the Project. The verifier was provided a copy of this paper.</p>
<p>Conformance: C</p>	<p>Another method of dissemination was discussed by the President of the Red River NWR Friends group is the newsletter sent to all group members as well as</p>

	the Refuge and Friends group facebook pages. The verifier reviewed these facebook pages and found information about the Refuge and the restoration Project on both pages.
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## 2.2. Climate Section

### 2.2.1. CL1 – Net Positive Climate Impacts

The project must generate net positive impacts on atmospheric concentrations of greenhouse gases (GHGs) within the project boundaries and over the project lifetime.

The project proponents must:

<p><b>CL1.1</b> - Use the methodologies of the Intergovernmental Panel on Climate Change’s Good Practice Guidance (IPCC GPG) to estimate the net change in carbon stocks due to the project activities. The net change is equal to carbon stock changes with the project minus carbon stock changes without the project (the latter having been estimated in G2). Alternatively, any methodology approved by the CDM Executive Board may be used. This estimate must be based on clearly defined and defensible assumptions about how project activities will alter carbon stocks and non-CO2 GHG emissions over the duration of the project or the project accounting period.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. The estimate of carbon stocks is based on a predictive model developed from extensive research in the Lower Mississippi Valley. Thus, the requirements of this indicator have been met.</p>
<p>Conformance: C</p>	

<p><b>CL1.2</b> - Factor in the non-CO2 gases CH4 and N2O to the net change calculations (above) if they are likely to account for more than 15% (in terms of CO2 equivalents) of the project’s overall GHG impact.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

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<p><b>CL1.3</b> - Demonstrate that the net climate impact of the project (including changes in carbon stocks, and non-CO2 gases where appropriate) will give a positive result in terms of overall GHG benefits delivered.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. The Project continues to generate a positive result in terms of overall GHG benefits. Thus, the requirements of this indicator have been met.</p>
<p>Conformance: C</p>	

**2.2.2. CL2 – Offsite Climate Impacts (‘Leakage’)**

The project proponents must quantify and mitigate likely negative offsite climate impacts; namely, decreased carbon stocks or increased emissions of non-CO2 GHGs outside the project boundary, resulting from project activities (referred to as “leakage” in climate change policy).

The project proponents must:

<p><b>CL2.1</b> - Estimate potential offsite decreases in carbon stocks (increases in emissions or decreases in sequestration) due to project activities.</p>	<p>As validated in the PDD, there continue to be no negative offsite impacts resulting from Project activities. This was confirmed during the site visit through visual reconnaissance and interviews with Refuge staff and member of the Red River NWR Friends group. Furthermore, no offsite decreases in carbon stocks due to Project activities have been observed by Refuge staff. Should leakage occur, the leakage will be measured and assessed during monitoring for CL 3. The Project is in conformance with the requirements of this indicator.</p>
<p>Conformance: C</p>	

<p><b>CL2.2</b> - Document how negative offsite impacts resulting from project activities will be mitigated, and estimate the extent to which such impacts will be reduced.</p>	<p>This indicator is not applicable to the Project.</p>
<p>Conformance: C</p>	

<p><b>CL2.3</b> - Subtract any likely project-related unmitigated negative offsite climate impacts from the climate benefits being claimed by the project. The total net effect, equal to the net increase in onsite carbon stocks (calculated in the third indicator in CL1) minus negative offsite climate impacts, must be positive.</p>	<p>This indicator is not applicable to the Project.</p>
<p>Conformance: C</p>	

**2.2.3. CL3 – Climate Impact Monitoring**

Before a project begins, the project proponents must have an initial monitoring plan in place to quantify and document changes in project-related carbon pools, and non-CO2 GHG emissions if appropriate, (within and outside the project boundaries). The monitoring plan should state which measurements will be taken and which sampling strategy will be used.

Since developing a full carbon-monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being evaluated by the CCB Standards.

This will be especially true for small-scale projects.

The project proponents must:

<p><b>CL3.1</b> - Have an initial plan for how they will select carbon pools and non-CO2 GHGs to be monitored, and the frequency of monitoring. Potential pools include aboveground biomass, litter, dead wood, belowground biomass and soil carbon. Pools to monitor must include any pools expected to decrease as a result of project activities. Relevant non-CO2 gases must be monitored if they account for more than 15% of the project’s net climate impact expressed in terms of CO2 equivalents.</p>	<p>The initial plan for the monitoring of carbon pools discussed in the PDD and developed by ESI has been updated in the PIR. The “monitoring umbrella” of the Lower Mississippi now only includes other CCB restoration projects in bottomland hardwood forest developed by the Project Proponent. TerraCarbon created the revised monitoring plan and other changes in the monitoring plan include the use of default values for soil carbon in place of previously planned soil sampling as well as a tree survival analysis after 5 years in place of the same analysis after 3 to 4 years.</p>
<p>Conformance: C</p>	<p>In Year 10, the monitoring will transition from a survival sampling to the measurement of tree carbon stocks which will be repeated every 5 years. This plan was discussed with the Fund and Refuge staff while visiting the Project Area. The updated monitoring plan meets the requirements of this indicator as the Project is on track to deliver the expected climate benefits described in the PDD.</p>

**2.2.4. CL4 - Adapting to Climate Change and Climate Variability**

Projects designed to anticipate and adapt to probable impacts of climate change and climate variability are more likely to sustain the benefits generated by the project over the long term.

The project proponents must:

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<p><b>CL4.1</b> - Identify likely regional climate change and climate variability impacts, using available studies.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	
<p><b>CL4.2</b> - Demonstrate that the project has anticipated such potential impacts and that appropriate measures will be taken to minimize these negative impacts.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

**2.2.5. CL5 - Carbon Benefits Withheld from Regulatory Markets**

When some carbon benefits generated by a project are not sold to satisfy regulatory requirements, additional mitigation action will be required elsewhere to meet these requirements. Therefore, withholding a portion of the project’s carbon benefits from being used in capped markets will result in greater overall climate change mitigation.

Moreover, projects that do not sell all their carbon benefits in regulated regimes have the opportunity to experiment with climate change mitigation activities other than the ones eligible under these regimes (such as avoided deforestation, which is not currently creditable under the Clean Development Mechanism). Such experimentation may generate new knowledge that is of value to carbon rule makers and other project developers.

The project proponents must:

<p><b>CL5.1</b> - Not sell at least 10% of the total carbon benefits generated by the project<sup>4</sup> into regulated GHG markets (e.g., CDM, New South Wales GHG Abatement Scheme, Oregon Standard). Projects can sell these carbon benefits in a voluntary market or retire them.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification.</p>
<p>Conformance: C</p>	

**2.3. Community Section**

**2.3.1. CM1 – Net Positive Community Impacts**

The project must generate net positive impacts on the social and economic wellbeing of communities within the project boundaries and within the project lifetime. In addition, local communities and other stakeholders should be engaged early on so that the project design can be revised based on their input.

Finally, projects should ensure that stakeholders can express concerns and grievances to project proponents and that these concerns are responded to in a timely manner.

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The project proponents must:

<p><b>CM1.1</b> - Use appropriate methodologies (e.g. the livelihoods framework) to estimate the net benefits to communities resulting from planned project activities. A credible estimate of net benefits must include changes in community wellbeing given project activities. This estimate must be based on clearly defined and defensible assumptions about how project activities will alter social and economic wellbeing over the duration of the project. The “with project” scenario must then be compared with the baseline scenario of social and economic wellbeing in the absence of the project (completed in G2). The difference (i.e., the net community benefit) must be positive.</p>	<p>The PIR describes the numerous community benefits generated by the Project. Such benefits include additional recreation opportunities (e.g. hunting and wildlife photography), economic benefits, and research opportunities for local colleges. During the site visit, the verifier interviewed Refuge staff and members of the Red River NWR Friends groups who confirmed the above community benefits generated by the Project. In addition, an article for the Shreveport Times stated that the Red River NWR provided a jolt to the local economy. No negative community impacts have been generated by Project activities. Thus, the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance: C</p>	

<p><b>CM1.2</b> - Document local stakeholder participation in the project’s planning. If the project occurs in an area with significant local stakeholders, the project must engage a diversity of stakeholders, including appropriate sub-groups, underrepresented groups and women living in the project vicinity. Stakeholders in the project’s area of influence must have an opportunity before the project design is finalized, to raise concerns about potential negative impacts, express desired outcomes and provide input on the project design. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input.</p>	<p>This indicator was assessed during the validation of the PDD and community members have the continued ability to comment about the Project and provide feedback. This was confirmed through interviews with Refuge staff, the Project Proponent, and representatives of the Red River NWR Friends Group. Thus, the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance: C</p>	

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<p><b>CM1.3</b> - Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving community grievances within a reasonable time period. This grievance process must be publicized to local stakeholders. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with Refuge staff, the Project Proponent, and representatives of the Red River NWR friends group. In addition, the Project Proponent and Refuge staff also stated that no grievances have been raised about the Project.</p>
<p>Conformance: C</p>	

**2.3.2. CM2 – Offsite Community Impacts**

The project proponents must quantify and mitigate likely negative social and economic offsite impacts; namely, the decreased social and economic wellbeing of communities or people living outside the project boundary, resulting from project activities.

The project proponents must:

<p><b>CM2.1</b> - Identify potential negative offsite community impacts that the project is likely to cause.</p>	<p>As validated in the PDD, there continue to be no negative offsite impacts resulting from Project activities. This was confirmed during the site visit through visual reconnaissance and interviews with Refuge staff and member of the Red River NWR Friends group.</p>
<p>Conformance: C</p>	

<p><b>CM2.2</b> - Describe how the project plans to mitigate these negative offsite social and economic impacts.</p>	<p>This indicator is not applicable to the Project.</p>
<p>Conformance: C</p>	

<p><b>CM2.3</b> -Evaluate likely unmitigated negative offsite social and economic impacts against the social and economic benefits of the project within the project boundaries. Justify and demonstrate that the net social and economic effect of the project is positive.</p>	<p>This indicator is not applicable to the Project.</p>
<p>Conformance: C</p>	

**2.3.3. CM3 – Community Impact Monitoring**

The project proponents must have an initial monitoring plan to quantify and document changes in social and economic wellbeing resulting from the project activities (within and outside the project boundaries).

The monitoring plan should indicate which measurements will likely be taken and which sampling strategy will be used to determine how the project affects social and economic wellbeing.

Since developing a full community-monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being evaluated by the CCB Standards. This will especially be true for small-scale projects.

The project proponents must:

<p><b>CM3.1</b> - Have an initial plan for how they will select community variables to be monitored, and the frequency of monitoring. Potential variables include income, health, roads, schools, food security, education and inequality. Community variables at risk of being negatively impacted by project activities should be monitored.</p>	<p>As stated in the PDD, the Red River NWR has grown both in size and in the provision of services to local residents. Visitor use has increased throughout the Refuge, by over 25,000 visitors since 2009. This information was verified through the Refuge Annual Performance Plans (RAPP) reports developed by Refuge staff. While visitation is tallied for the entire Refuge and not just the Project area, it was clear through the interviews with Refuge staff and the members of the Red River NWR Friends group that the numbers reflected in these reports also translate to increase use and interest in the Project area. Thus, the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance: C</p>	

**2.3.4. CM4 - Capacity Building**

Projects that include a significant capacity-building (training, skill building, etc) component are more likely to sustain the positive outcomes generated by the project and have them replicated elsewhere. The project proponents must include a plan to provide orientation and training for the project’s employees and relevant community members with an eye to building locally relevant skills and knowledge over time.

The project proponents must show that capacity building is:

<p><b>CM4.1</b> - Structured to accommodate the needs of communities, not only of the project;</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff.</p>
<p>Conformance: C</p>	

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<b>CM4.2</b> - Targeted to a wide range of groups, not just elites;	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff.
Conformance: C	

<b>CM4.3</b> - Targeted to women to increase their participation; and	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent, Refuge staff, and members of the Red River NWR Friends group.
Conformance: C	

<b>CM4.4</b> - Aimed to increase community participation in project implementation.	The plantings within the Project area have grown since the plantings in 2010. Due to this growth, recreationists such as hunters and nature photographers have increased their visitation to the project lands. The community is also actively involved in participating in the Project implementation by providing feedback. This community participation was confirmed through interviews with the Project Proponent, Refuge staff, and members of the Red River NWR Friends group.
Conformance: C	

**2.3.5. CM5 - Best Practices in Community Involvement**

Projects that use best practices for community involvement are more likely to benefit communities. Best practices include: respect for local customs, local stakeholder employment, worker rights and worker safety.

The project proponents must:

<b>CM5.1</b> - Demonstrate that the project was developed with a strong knowledge of local customs and that, where relevant, project activities are compatible with local customs.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff.
Conformance: C	

<b>CM5.2</b> - Show that local stakeholders will fill all employment positions (including management) if the job requirements are met. Project proponents must explain how stakeholders will be selected for positions and where relevant, must indicate how	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff.
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traditionally underrepresented stakeholders and women, will be given a fair chance to fill positions for which they can be trained.	
Conformance: C	

<b>CM5.3</b> - Show that the project will inform workers about their rights, and that the project complies with international rules on worker rights.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff.
Conformance: C	

<b>CM5.4</b> - Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. This was confirmed through interviews with the Project Proponent and Refuge staff.
Conformance: C	

**2.4. Biodiversity Section**

**2.4.1. B1 – Net Positive Biodiversity Impacts**

The project must generate net positive impacts on biodiversity within the project boundaries and within the project lifetime, measured against the baseline conditions.

Projects should have no negative effects on species included in the IUCN Red List of threatened species (which encompasses endangered and vulnerable species) or species on a nationally recognized list (where applicable). Invasive species must not be planted by the project.

Genetically Modified Organisms (GMOs), as a relatively new form of technology, raise a host of ethical, scientific and socio-economic issues. Some GMO attributes may result in invasive genes or species. In the future, certain GMOs may be proven safe. However, given the currently unresolved issues surrounding GMOs, projects cannot use genetically modified organisms to generate carbon credits.

The project proponents must:

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<p><b>B1.1</b> - Use appropriate methodologies (e.g., key species habitat analysis, connectivity analysis) to estimate changes in biodiversity as a result of the project. This estimate must be based on clearly defined and defensible assumptions. The “with project” scenario should then be compared with the baseline “without project” biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.</p>	<p>As described in the validated PDD and PIR, the Project will estimate changes in bird species in the Project area through surveys by Refuge staff every five years. During the site visit, the Refuge biologist and staff agreed that the Project has had a positive impact on the richness and variety of bird species found in the Project area due to the increased habitat area and greater habitat complexity provided by the newly planted bottomland hardwood forest (see B 3.1 for more detail). The Project has had a net positive impact on biodiversity. Thus, the Project is in conformance with the requirements of this indicator.</p>
<p>Conformance: C</p>	

<p><b>B1.2</b> - Describe possible adverse effects of non-native species on the area’s environment, including impacts on native species and disease introduction or facilitation. If these impacts have a substantial bearing on biodiversity or other environmental outcomes, the project proponents must justify the necessity of using non-native species over native species.</p>	<p>This indicator is not applicable to the Project.</p>
<p>Conformance: C</p>	

<p><b>B1.3</b> - Identify all IUCN Red List threatened species and species deemed threatened on nationally recognized lists that may be found within the project boundary. Project proponents must document how project activities will not be detrimental in any way to these species.</p>	<p>This indicator was assessed during the validation of the PDD. The verifier confirmed through an interview with the Refuge biologist that Project activities would not be detrimental to neither biodiversity nor special status species.</p>
<p>Conformance: C</p>	

<p><b>B1.4</b> - Identify all species to be used by the project and show that no known invasive species will be used.</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Furthermore, the Project Proponent provided letters from the Refuge Manager that the plantings were in conformance with the Project design. The Refuge forester concurred that only native species were planted in the Project. Thus, the Project is in conformance with the requirements of</p>
<p>Conformance: C</p>	

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	this indicator.
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<b>B1.5</b> - Guarantee that no genetically modified organisms will be used to generate carbon credits.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. The Project Proponent provided letters from the Refuge Manager that the plantings were in conformance with the Project design. Thus, the Project is in conformance with the requirements of this indicator.
Conformance: C	

**2.4.2. B2 – Offsite Biodiversity Impacts**

The project proponents must quantify and mitigate likely negative offsite biodiversity impacts; namely, decreased biodiversity outside the project boundary resulting from project activities.

The project proponents must:

<b>B2.1</b> - Identify potential negative offsite biodiversity impacts that the project is likely to cause.	As validated in the PDD, there continue to be no negative offsite impacts resulting from Project activities. This was confirmed during the site visit through visual reconnaissance and interviews with Refuge staff and member of the Red River NWR Friends group.
Conformance: C	

<b>B2.2</b> - Describe how the project plans to mitigate these negative offsite biodiversity impacts.	This indicator is not applicable to the Project.
Conformance: C	

<b>B2.3</b> - Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.	This indicator is not applicable to the Project.
Conformance: C	

**2.4.3. B3 – Biodiversity Impact Monitoring**

The project proponents must have an initial monitoring plan to quantify and document the changes in biodiversity resulting from the project activities (within and outside the project boundaries). The monitoring plan should state which measurements will likely be taken and which sampling strategy used.

Since developing a full biodiversity-monitoring plan can be costly, it is accepted that some of the plan details may not be fully defined at the design stage, when projects are being evaluated by the CCB Standards. This will especially be true for small-scale projects.

The project proponents must:

<p><b>B3.1</b> - Have an initial plan for how they will select biodiversity variables to be monitored, and the frequency of monitoring. Potential variables include species abundance and diversity, landscape connectivity, forest fragmentation, habitat area and diversity, etc. Biodiversity variables at risk of being negatively impacted by project activities should be monitored.</p>	<p>The PIR describes the bird richness surveys for biodiversity impact monitoring. During the site visit, the Refuge biologist confirmed that there has been an increase in the observation of bird species over the baseline scenario. The Refuge annual narrative reports from 2011 and 2012 provided data about the Monitoring Avian Productivity and Survivorship (MAPS) station outside of the Project area and there was an increase in both species and individuals between the two years. The 2012 monitoring included a pilot mist-netting in the Project area and these data can also be used as a baseline for future years of monitoring. The species identified were more associated with bottomland hardwood forest than field. The results from the monitoring confirmed this expectation.</p>
<p>Conformance: C</p>	

**2.4.4. B4 - Native Species Use**

In most cases, species that are native to a region will have a higher biodiversity benefit than non-native species. In other cases, non-native species can be more effective than native species for rehabilitating degraded areas or providing fast growing biomass, timber, fruits and other beneficial products. For instance a project may need to use non-native species on severely degraded land to achieve ecological restoration before native species can be reintroduced.

The project proponents must:

<p><b>B4.1</b> - Show that the project will only use species that are native to the region.  OR  Justify that any non-native species used by the project are superior to native</p>	<p>This indicator was assessed during the validation of the PDD and there has been no change to the Project. Furthermore, the Project Proponent provided letters from the Refuge Manager that the planting was to done in accordance with his specifications. The Refuge Forester who developed the species planting list also confirmed that only</p>
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species for generating concrete biodiversity benefits (e.g., for rehabilitating degraded areas unlikely to support natives, or for producing fuel wood that reduces logging pressure on intact ecosystems).	native species to the region had been planted. Thus, the Project is in conformance with the requirements of this indicator.
Conformance: C	

**2.4.5. B5 - Water and Soil Resource Enhancement**

Climate change and other factors may stress and degrade water and soil resources at the project site over time. Projects should enhance the quality and quantity of water and soil resources.

The project proponents must:

<b>B5.1</b> - Identify project activities that are likely to enhance water and soil resources.	As discussed in the validated PDD, one of the objectives of the Project is to enhance water and soil resources through the restoration of bottomland hardwood forest in the Refuge. The growth of the planted trees continues to meet this primary objective. During the site visit, the verifier confirmed that the Project was in conformance with this indicator by visiting the Project planting sites.
Conformance: C	

<b>B5.2</b> - Credibly demonstrate that these activities are likely to improve water and soil resource compared to the baseline, using justifiable assumptions about cause and effect, and relevant studies.	This indicator was assessed during the validation of the PDD and there has been no change to the Project. Thus, it was not necessary to assess this indicator again during verification.
Conformance: C	

**3.0 CCB Verification Opinion**

Following completion of SCS’ duly-accredited verification process, it is our opinion that the Red River National Wildlife Refuge Restoration Initiative has been implemented in conformance with its validated Gold Level Project Design Document and continues to generate climate, community and biodiversity benefits (see Appendix A).

**Appendix A**

**CCBA Compliance Checklist**

**General Section**

		<b>Conformance</b>		
G1.	Original Conditions at the Project Site (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 (Required)	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
G5.	Land Tenure (Required)	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
G6.	Legal Status (Required)	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
G7.	Adaptive Management for Sustainability (Optional)	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
G8.	Knowledge Dissemination (Optional)	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"/>
CL4.	Adapting to Climate Change & Climate Variability (Optional)	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
CL5.	Carbon Benefits Withheld from Regulatory Markets (Optional)	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"/>
CM2.	Capacity Building (Optional)	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
CM3.	Best Practices in Community Involvement (Optional)	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"/>
B2.	Native Species Use (Optional)	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>
B3.	Biodiversity Impact Monitoring (Optional)	Yes	<input checked="" type="checkbox"/>	No <input type="checkbox"/>

**CCBA Verification Level Attained:**

<b>APPROVED</b> - (all requirements met)	<input checked="" type="checkbox"/>
<b>SILVER</b> - (All requirements met, plus one point minimum from at least three different sections)	<input type="checkbox"/>
<b>GOLD</b> - (All requirements met, six points minimum, at least one point from four different sections)	<input checked="" type="checkbox"/>

## Appendix B

### Public Comment

#### Comment 1

Date: 10 February 2014

Sent by: Lynn Stewart, President, Friends of Red River National Wildlife Refuge

As a charter member of the Friends of Red River National Wildlife Refuge, I would like to thank those responsible for the reforestation of 1,173 acres on the refuge. These recovered lands will offer amazing benefits to both the wildlife and the public in Northwest and Central Louisiana for generations to come. So much of our hardwood bottomland forest had been lost to agricultural use in preceding decades. Through the reforestation initiative aided by the Go Zero program, we will be able to enjoy the wonders that come with this large-scale reforestation effort, including cleaner air, filtered water and restored habitat along the Red River.

Ours is a relatively new refuge and public awareness about us continues to grow. We have seen steadily growing numbers of area residents who are enjoying the benefits of these lands – including hunters, birders, other wildlife observers, and students learning about environmental issues. Along with the trees planted here, our appreciation continues to grow as well.

## Appendix C

### Findings

**NIR 2013.1 dated 02/05/2014**

**Standard Reference:** CCB Standards, First Edition, G3.2

**Document Reference:** PIR and PDD, G3.2

**Finding:** G3.2 of the Standards requires a description of project activities to achieve project goals. The PDD states that ESI will evaluate current carbon stocks by measuring base year characteristics of the area, including initial carbon stocks in the soil and estimates of biomass carbon of any significant plant material existing on the site prior to planting. CL 3.1 of the PIR states that soil carbon default values were used but does not state whether significant plant material was measured. Please clarify.

Additionally, the site preparation and planting activities describes the number of species, site prep and planting rate for the project. Please provide a description of whether these project activities were implemented as designed in the PDD.

**Project Proponent Response:** The initial site assessment that was conducted prior to planting in 2009 concluded that there was no significant plant material present at the planting site. The default values that will be used also assume zero plant biomass at the project start.

Both the site preparation and planting activities were implemented as specified in the PDD. The species planted are also consistent with what is stated in the PDD. At the conclusion of each planting, the Refuge Manager wrote a letter to the planting team at Environmental Synergy Inc confirming that the planting was performed according to specifications and completed to their satisfaction. These letters are attached to this response.

**Auditor Response:** The Project Proponent's response adequately addresses the finding. This finding is closed.

**CCBA Project Verification Report**  
**Red River NWR Restoration Initiative**

**NIR 2013.2 dated 02/05/2014**

**Standard Reference:** CCB Standards, First Edition, G3.5

**Document Reference:**

**Finding:** During the site visit, oil and gas infrastructure was viewed and mentioned as a possible risk to the reforestation sites. While this was not mentioned in the PDD, please describe this risk in the PIR and outline measures that the project plans to undertake to mitigate these risks.

**Project Proponent Response:** While oil and gas extraction on Refuge lands presents a small risk to the Go Zero project, the overall risk to the Go Zero trees is very low and there are multiple safeguards in place to minimize the risk.

By law, persons holding mineral rights on these parcels of Refuge lands are required to get a Special Use Permit from the FWS to extract those minerals and the FWS has to give approval on any of the mineral holder's actions. The mineral rights holder must conduct operations in a manner as to prevent damage, erosion, pollution, or contamination to the lands, waters, facilities and vegetation in the Refuge area. Operations must also be conducted without interference with the operation of the Refuge or disturbance of wildlife, and once operations are completed, the area shall be restored as nearly as possible to its original condition.

Given the extensive permit requirements for extracting minerals on Refuge lands (compounded by the complex ownership arrangements on the Refuge) it's very unlikely that the individual holding these mineral rights would choose to exercise them on Red River Refuge lands. It would be much easier for the mineral rights holders to perform drilling operations on adjacent private lands.

If mineral extraction were to occur, the affected project area would be very minimal. The ground disruption at a pad site is approximately 4 acres (or about 1,200 trees) – this would become an extraction site with gravel on top. The total affected area would be less than 1% of the total Project Area. In order to mitigate this disruption, the Refuge would plant 4 acres elsewhere on the Refuge and replace the 1,200 trees that could be lost due to extraction activities. As noted in section CL1.3 of the Project Design Document, a buffer pool of offsets has not been marketed as part of the project and this buffer should be large enough to account for any impacts from mineral extraction that might reduce the total carbon accumulation generated by this project.

**Auditor Response:** The identified mitigation plan to plant 4 acres in another area of the Refuge in the event that there is a 4 acre disturbance appropriately reduces the risk to the reforestation project. However, while reading the 2011 Annual Narrative for the Refuge, a megapad of 8 acres was to be cleared for natural gas extraction. Please clarify if the 1:1 replacement in the 4 acre scenario would be honored for potential land alteration activities which are larger. The Project Proponent's response adequately addresses the finding. This finding is closed.

**CCBA Project Verification Report**  
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**NIR 2013.3 dated 02/05/2014**

**Standard Reference:** CCB Standards, First Edition, G3.6

**Document Reference:** PIR and PDD, G3.6, G 4.1, and G4.3

**Finding:** The PIR states that TerraCarbon has replaced ESI in the role of carbon sequestration consultant to conduct monitoring and carbon analysis. During the site visit it was discussed that the Refuge complex staff would conduct the carbon stock monitoring and that the carbon data analysis would be performed by the Fund. Please provide a description of the project activities and monitoring that Terracarbon is to perform.

**Project Proponent Response:** To date, TerraCarbon has provided services to the Fund on a contractual basis. As the project moves forward, The Conservation Fund will secure services such as carbon monitoring and analysis and replanting (if necessary) on an as-needed basis (although a significant portion of this work will be performed by Fund or Refuge staff). TerraCarbon is one of several contractors that may be used for these purposes; there are no long term agreements for TerraCarbon's continued participation in this project. All of these services will be performed under the direction of The Conservation Fund and the Red River National Wildlife Refuge.

**Auditor Response:** The Project Proponent's response adequately addresses the finding. This finding is closed.

**NIR 2013.4 dated 02/05/2014**

**Standard Reference:** CCB Standards, First Edition, G3.7

**Document Reference:** PDD, G3.7

**Finding:** G3.7 states that all project documentation is to be made publicly accessible at or near the project site. Please include in the PIR how this requirement has been met.

In addition, the PDD states that all key documentation and information regarding the project will be available on the Fund's website. Please provide evidence that the PIR is available as stated.

**Project Proponent Response:** The Project Implementation Report has been placed at the front of the Refuge Headquarters building in a prominent location by the volunteer station and gift shop (see attached photographs). This is where all of the informational brochures and documents pertaining to Refuge activities are displayed. In addition, links to the Project Implementation Report have been posted to the Refuge webpage, the Refuge Facebook site, the Red River Friends group Facebook page and The Conservation Fund website. Screen shots and/or links have been provided as proof of these postings.

**Auditor Response:** The Project Proponent's response adequately addresses the finding. This finding is closed.

**CCBA Project Verification Report**  
**Red River NWR Restoration Initiative**

**NIR 2013.5 dated 02/05/2014**

**Standard Reference:** CCB Standards, First Edition, CL3.1

**Document Reference:** PIR, CL3.1

**Finding:** Please provide the results of the tree survival analysis described in CL3.1 and justify that these survival rates are acceptable to sequester carbon at the original estimated rates.

**Project Proponent Response:** The Conservation Fund monitoring plan, which replaces the ESI monitoring plan, does not require a survival analysis before 5 years. The Project Implementation Report has been edited to reflect this change. To assess the survival of the trees planted at Red River NWR, a series of survival plots will be installed in the spring of 2014. If the Refuge staff, in consultation with the Fund, determines that survival rates are not acceptable, the Fund will perform supplemental planting as necessary.

**Auditor Response:** The Project Proponent's response adequately addresses the finding. This finding is closed.

**NIR 2013.6 dated 02/05/2014**

**Standard Reference:** CCB Standards, First Edition, CM3.1

**Document Reference:** PIR, CM3.1

**Finding:** Please provide the Refuge's annual reports, which include the visual estimate of community use prior the project start date until the present (2009-2013).

**Project Proponent Response:** The Refuge's annual reports from 2009-2012 are attached to this response. The 2013 annual report will not be completed until later this year. Note that the Go Zero project and its Gold Level CCBA validation is highlighted in the 2009 report and the Go Zero plantings (for the 251 acre parcel) are referenced in the Habitat Restoration section of the 2010 report. Visitor usage is described in each report in the Public Education and Recreation section, and Friends group and other volunteer activities are described in the Coordination Activities and Planning and Administration sections.

Also attached here are the Refuge's RAPP (Refuge Annual Performance Plan) reports related to visitor use from 2009 – 2013. Note that visitor usage, as reported in the RAPP, increased from approximately 1,330 visitors in 2009 to 26,500 visitors in 2013, an increase of over 25,000 visitors in 5 years.

**Auditor Response:** The Project Proponent's response adequately addresses the finding. This finding is closed.

**CCBA Project Verification Report**  
**Red River NWR Restoration Initiative**

**NIR 2013.7 dated 02/05/2014**

**Standard Reference:** CCB Rules, December 2013, page 18

**Document Reference:** PIR

**Finding:** Please include all of the cover page requirements described in the revised CCB Rules in the Project Implementation Report.

**Project Proponent Response:** Please see the attached updated cover page of the revised PIR which includes all of the elements described in the CCB Rules. The revised Project Implementation Report (with updated cover) will also be submitted for review.

**Auditor Response:** Thank you for updating the PIR cover page to meet the requirements of the CCB rules. Please also include information for the following requirements: (iii) the contract name with email address and phone number for the Project Proponent and (x) brief summary of the exceptional benefits generated by the project to meet the requirements of each relevant Gold Level.

**Project Proponent Response 2:** [Revised summary of exceptional benefits generated by the project submitted.]

**Auditor Response 2:** The Project Proponent's response adequately addresses the finding. This finding is closed.