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# California air resources board forest carbon protocol invalidates offsets

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The commercial asset value of sequestered forest carbon is based on protocols employed globally, however, their scientific basis has not been validated. We review and analyze commercial forest carbon protocols and offsets, claimed to have reduced net greenhouse gas emissions, issued by the California Air Resources Board and validated by the Climate Action Reserve (CARB-CAR). CARB-CAR protocol annual offsets, resulting from forest mensuration and growth simulation models, are compared with a population of forest field sites for which annual net ecosystem exchange (NEE) of carbon was measured directly as flux by CO<sub>2</sub> eddy covariance, a meteorologically based method integrating forest carbon pools. We characterize differences between the protocols by testing the null hypothesis that the CARB-CAR commercial annual offset data fall within the boundaries of directly measured forest carbon NEE; gC m<sup>-2</sup>yr<sup>-1</sup> are compared for both datasets. Irrespective of geographic location and project type, the CARB-CAR population annual mean value is significantly different from the NEE population mean at the 95% confidence interval, rejecting the null hypothesis. The CARB-CAR population exhibits standard deviation ~5x that of the NEE natural ranges; the variance exceeds the 5% compliance limit for invalidation of CARB-CAR offsets. Exclusion of the soil carbon pool typical for CARB-CAR net carbon budgets pose insuperable carbon accounting uncertainty for offsets that extend to vendor platforms and policies including the United Nations Program on Reducing Emissions from Deforestation and Forest Degradation and the Paris Agreement. NEE methodology for commercial forest carbon offsets ensures in situ molecular specificity, verification of claims for net carbon balance, performance-based pricing and harmonization of carbon protocols for voluntary and compliance markets worldwide, in contrast to continuing uncertainty posed by traditional estimation-based forest carbon protocols.

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1 2	Methodology Review  California Air Resources Board Forest Carbon Protocol Invalidates Offsets
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- 38 **Abstract**
- 39 The commercial asset value of sequestered forest carbon is based on protocols employed
- 40 globally, however, their scientific basis has not been validated. We review and analyze
- 41 commercial forest carbon protocols and offsets, claimed to have reduced net greenhouse
- 42 gas emissions, issued by the California Air Resources Board and validated by the Climate
- 43 Action Reserve (CARB-CAR). CARB-CAR protocol annual offsets, resulting from forest
- 44 mensuration and growth simulation models, are compared with a population of forest
- 45 field sites for which annual net ecosystem exchange (NEE) of carbon was measured
- directly as flux by CO<sub>2</sub> eddy covariance, a meteorologically based method integrating 46
- 47 forest carbon pools. We characterize differences between the protocols by testing the null
- 48 hypothesis that the CARB-CAR commercial annual offset data fall within the boundaries
- 49 of directly measured forest carbon NEE; gC m<sup>-2</sup>yr<sup>-1</sup> are compared for both datasets.
- 50 Irrespective of geographic location and project type, the CARB-CAR population annual
- mean value is significantly different from the NEE population mean at the 95% 51
- 52 confidence interval, rejecting the null hypothesis. The CARB-CAR population exhibits
- 53 standard deviation ~5x that of the NEE natural ranges; the variance exceeds the 5%
- compliance limit for invalidation of CARB-CAR offsets. Exclusion of the soil carbon pool 54
- typical for CARB-CAR net carbon budgets pose insuperable carbon accounting
- 56 uncertainty for offsets that extend to vendor platforms and policies including the United
- 57 Nations Program on Reducing Emissions from Deforestation and Forest Degradation and
- the Paris Agreement. NEE methodology for commercial forest carbon offsets ensures in 58
- 59 situ molecular specificity, verification of claims for net carbon balance, performance-
- 60 based pricing and harmonization of carbon protocols for voluntary and compliance
- 61 markets worldwide, in contrast to continuing uncertainty posed by traditional
- 62 estimation-based forest carbon protocols.



- 63 Keywords: net forest carbon sequestration, carbon markets, carbon trading,
- 64 California Air Resources Board, carbon offset uncertainty

#### 1. Introduction

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Carbon markets ideally conserve natural resources<sup>1,2</sup>, limit surface warming to < 1.5 °C 66 relative to the pre-industrial period<sup>3-5</sup>, and are commercially viable<sup>6-8</sup>. However, 67 uncertainty in carbon product asset value<sup>9</sup> and market function can negatively affect 68 carbon markets and their efficacy to manage climate change 10-13. For example, global 69 70 carbon compliance markets have declined from ~\$95B€ in 2011<sup>14</sup> to \$41B€ in 2017<sup>15</sup>, a decrease of ~57%, attributed to the absence of a price for carbon<sup>16</sup>, oversupply of 71 offsets<sup>17,18</sup>, ambiguity of disparate trading platforms<sup>19</sup>, and as we argue here for forest 72 73 carbon, absence of direct and verifiable measurement of CO<sub>2</sub> and related carbon storage products<sup>20–23</sup>. An unprecedented 3.4 ppm surge in atmospheric CO<sub>2</sub> in 2016 related to 74 the 2015/2016 El Nino event<sup>24,25</sup>, and updated projections for warming by the 75 Intergovernmental Panel on Climate Change (IPCC)<sup>5</sup>, call into question the efficacy of 76 carbon markets (e.g. cap-and-trade<sup>26</sup>, carbon tax<sup>27</sup>) to manage Earth's changing 77 climate<sup>8,28</sup>. Carbon markets are primarily driven by reduction/avoidance of emissions 78 to the atmosphere from energy production and consumption<sup>29</sup> while investment in 79 80 removal of CO<sub>2</sub> from the atmosphere by reforestation and conservation has not gained carbon market traction<sup>30,31</sup> and has declined by ~ 72% from 2011 to 2016<sup>32,33</sup>. To-date, 81 global forests have been reduced by ~35-46% relative to the preindustrial period<sup>34,35</sup>. 82 83 Deforestation continues at a rate of ~ 1.5M km<sup>-2</sup>yr<sup>-1</sup> (e.g., 2000 to 2016) and is exclusively 84 caused by anthropogenic activities<sup>36</sup>. Global forests are in a state of flux; reversal of 85 deforestation is geographically uneven and continues to increase overall<sup>37</sup>, underscoring the importance of validating forest carbon markets. Approximately 1 to 2 billion 86 hectares of degraded and deforested land represent a unique opportunity for humanity 87 to reclaim these areas for restoration and partial management of atmospheric  $CO_2^{38-41}$ . 88 Forests provide ecosystem services of soil carbon sequestration and water 89 conservation<sup>42</sup>, biodiversity safeguards<sup>43</sup>, and the coupling of avoided forest carbon 90 emissions with Indigenous Peoples habitation<sup>44,45</sup>. While reforestation and natural 91 92 regeneration projects address climate change mitigation in the contemporary context<sup>5</sup>, are readily implemented at low cost<sup>40,46</sup> and are of social and planetary value<sup>35</sup>, they 93 face the same accounting uncertainties and measures of carbon sequestration efficacy<sup>41,47</sup> 94 95 as for carbon emission reduction approaches worldwide posing a barrier to market acceptance of forest carbon sequestration trading and improved rates of sustained 96 97 reforestation<sup>22,48</sup>. The efficacy of protocols for determination of net forest carbon 98 sequestration are of importance in catalyzing forest restoration and conservation efforts 99 but have not been independently validated.



100 Here we review and assess the suitability and uncertainty of widely employed net forest carbon sequestration protocols<sup>49</sup>, their scientific validity, impact on the value of carbon 101 markets and efficacy in reducing the burden of atmospheric CO<sub>2</sub>. Specifically, we 102 analyze annual forest carbon offset results for the California Air Resources Board<sup>50</sup> 103 104 (CARB) responsive to the Global Warming Solutions Act of 2006 (California Assembly 105 Bill 32<sup>51</sup>). The CARB issues carbon offsets based on determination of net forest carbon sequestration according to CARB and Climate Action Reserve (CAR) protocols<sup>52–55</sup> 106 (CARB-CAR); ~111 million metric tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e)<sup>i</sup> have been issued since 107 108 2006<sup>52</sup>. The CARB-CAR protocols employ limited forest mensuration practice (e.g., forest survey every six years or longer; incomplete carbon pool accounting), vegetation 109 proxies<sup>56</sup>, estimated baselines and growth simulation models<sup>57,58</sup> that must quantify net 110 carbon sequestration as real, additional, permanent, verifiable, and enforceable<sup>54,55,57</sup>. 111 The CARB compliance rules stipulate invalidation criteria for offsets that exceed 5% of 112 113 actual net forest carbon for a period of up to eight years<sup>55,59</sup>; CARB-CAR offsets have not 114 been independently evaluated for this criteria. The CARB-CAR protocols share intrinsic numerical equations, carbon pool estimation terms, and model simulation parameters 115 with the Clean Development Mechanism<sup>60</sup> (CDM), the American Carbon Registry<sup>61,62</sup> 116 (ACR), the Verified Carbon Standard<sup>63</sup> (VCS) and the Gold Standard<sup>64</sup> (GS) (Supplement 117 2). The CARB-CAR and related forest carbon estimation protocols lack development of 118 direct in situ measurement of gaseous project CO<sub>2</sub> programs and have not been validated 119 by comparison with direct measurements. 120

To address validation of the CARB-CAR protocol, we compare a population of annual 121 CARB-CAR values for net forest carbon sequestration, the basis for forest carbon offsets, 122 123 with a population of annual values for projects that were monitored directly, in situ, for molecular CO<sub>2</sub> net flux, and characterized statistically<sup>65</sup> (referred to here as NEE1). The 124 NEE1 data are based on globally applied eddy covariance methods<sup>66,67</sup> to quantify net 125 carbon sequestration, or net ecosystem exchange (NEE) (also referred to as net 126 ecosystem production (NEP)<sup>68,69</sup>) (Methods) as tCO<sub>2</sub>e or gC m<sup>-2</sup>yr<sup>-1</sup>. NEE represents the 127 meteorologically integrated net ecosystem carbon exchange of all carbon pools resulting 128 from direct, high precision and high frequency measurement (continuous or semi-129 130 continuous) of the vertical gross CO<sub>2</sub> fluxes for photosynthesis (i.e., CO<sub>2</sub> assimilation) and ecosystem respiration (i.e., above ground respiration by plants and CO<sub>2</sub> efflux as 131 soil respiration from autotrophic and heterotrophic soil microbes)<sup>68</sup>. While eddy 132 133 covariance and CARB-CAR methods represent differing scales of observation<sup>55,70,71</sup>, not 134 controlled for in this study, we analyze population level differences for annual values 135 across similar geographic regions. Eddy covariance is independent of CARB-CAR and 136 related protocols that lack direct measurement of gaseous CO<sub>2</sub>, however, the result of both methods is determination of annual net forest carbon sequestration<sup>54,55,65</sup> expressed 137 in equivalent units of gC m<sup>-2</sup>yr<sup>-1</sup> as reported (or as converted) for the projects. Both 138



- project methods are applied to forested environments over annual periods to determine
- NEE. The NEE1 and CARB-CAR projects, while representing different locations, with
- one exception (Howland, ME, USA) discussed below, share overlapping ecological (e.g.,
- landcover) and forest characteristics of regions in the US common to both data sets
- including coastal and inland environments.
- 144 Statistical comparisons of the two project populations of annual forest carbon data were
- undertaken to reveal shared population characteristics, the accuracy and precision
- resulting from the CARB-CAR protocol methods relative to NEE1 annual values and by
- extension protocols that share CARB-CAR methods for determination of net forest
- carbon sequestration. We tested the null hypothesis that the CARB-CAR annual
- population mean for net forest carbon sequestration data fall within the statistical
- boundaries of the NEE1 project annual population mean<sup>65</sup>. Moreover, given the absence
- of direct CARB-CAR CO<sub>2</sub> measurement to test compliance thresholds, we incorporate
- this criterion in our analysis relying upon NEE1<sup>65</sup> as a reference population for annual
- net forest carbon values. In view of the statistical differences between the two
- populations, we assess and summarize the uncertainty, accuracy and precision of the
- 155 CARB-CAR protocols, their effect on pricing of forest carbon products and their impacts
- on carbon market integrity. We also review implications of our findings for policy
- 150 of carbon market integrity. We also review implications of our interings for pointy
- driven forest carbon programs including the REDD<sup>72</sup>, the Paris Agreement<sup>73</sup> and the
- 158 AB32 Legislation<sup>51</sup>.

### 159 **2. Results**

- Table I summarizes the CARB-CAR project sites (n = 63) and attributes considered in this
- study. Links to serial numbers for offsets issued and to summary pages of the CAR online
- 162 documentation are provided. Features of the CARB-CAR process representing
- incomplete carbon accounting are identified: 1) exclusion of the soil carbon pool is
- 164 confirmed for all CARB-CAR projects (Methods, CARB Protocols), 2) selected projects
- 165 record single vintage year carbon sequestration but underlying data are arbitrarily
- assigned to partial years of carbon sequestration (63 instances). Protocol inconsistencies
- 167 noted include: 1) model operations are arbitrarily executed as forward and backward
- runs relative to the start date of the project (33 instances), 2) anomalous initial year values
- are reported as a single vintage year but represent a different and arbitrary carbon
- accounting process compared to subsequent vintage years (31 instances).
- 171 Statistical analysis of CARB-CAR and NEE1 annual data were analyzed as two
- 172 independent samples allowing comparison of the populations for similarities and
- differences. All annual values from the datasets are used in the analyses (i.e., gC m<sup>-2</sup>yr<sup>-1</sup>
- annual carbon-to-carbon results comparison) and obtained from CARB-CAR and NEE1
- sources (Table 1, Methods, Supplement 1). We first test the hypothesis that the results for



CARB-CAR population data, pooled across all annual intervals, for net forest 176 177 sequestration fall within the NEE1 population median, mean and standard deviation (SD, ±) employing box plots (Figure 1 (a), (b)) and calculation of mean and SD. Selected 178 179 segments of overlapping time intervals for the two populations, excluding outliers, are then used to test the null hypothesis that the large difference in mean values between 180 181 CARB-CAR and NEE1 populations were drawn from the same underlying population (Figure 2). Overlapping time intervals are also employed to test that the CARB-CAR 5% 182 threshold of invalidation is not violated (Figure 3) for annual average net forest 183 sequestration values of CARB-CAR projects. The hypothesis that the CARB-CAR 184 population data does not violate the 5% invalidation rule employing p-values for the 185 difference in means for both populations (Table II) for all overlapping years is then tested. 186 187 Comparison of specific CARB-CARB and NEE1 sites, with links to source data, can be explored with the interactive project map provided (Supplement 1). Differences in mean 188 values for CARB-CAR and NEE1 data noted to emphasize the inconsistency between the 189 190 methods are expressed as percentage errors where applicable<sup>ii</sup>. A review of the numerical 191 equations employed in the CARB-CAR and related protocols is presented in Supplement 2 and referenced in the Discussion. 192

193 Figure 1 (a) presents a box plot of annual records from CARB-CAR (63 sites, 340 annual records) and NEE165 (59 sites, 540 annual records) projects (Table I, Supplement 3). The 194 box plot shows the median (white line through each box), the 25th percentile (bottom of 195 lower box), the 75th percentile (top of upper box), the upper and lower whiskers 196 representing respective values that are not outliers, and outliers (individual open circles). 197 The CARB-CAR data is left-skewed, meaning that it has an abnormally large number of 198 199 small magnitude outliers, in this case representing extreme values for carbon 200 sequestration. The skewness and kurtosis for the CARB-CAR dataset are -3.69 and 17.67 as compared to the NEE1 dataset of 0.25 and 2.31, respectively. Outliers are detected as 201 points smaller than the 25<sup>th</sup> percentile by at least three times the interquartile range (the 202 difference between the 75th and the 25th percentile). It is notable that both datasets contain 203 204 outliers. NEE1 contains both small and large outliers, while all extreme values in the 205 CARB-CAR data are of very small magnitude. Figure 1(a) shows the difference in distribution, central values and outliers between the populations. Due to the skewness of 206 the CARB-CAR data, we present a selected interval of the box plot excluding the CARB-207 CAR outliers in Figure 1 (b) to further illustrate the differences between the populations. 208 209 The box plot (Figure 1 (b)) shows the difference for the CARB-CAR median of gC m<sup>-2</sup>yr<sup>-1</sup> as compared to the NEE1 median value of -172.5 gC m<sup>-2</sup>yr<sup>-1</sup> corresponding to 210 the larger spread and left-skewness of CARB-CAR values. The population means and 211 212 standard deviations (±), considering all annual values (Figure 1(a)) of the CARB-CAR and 213 NEE1 datasets are, respectively,  $-948.8 \pm 1,504.8 \text{ gC m}^{-2}\text{yr}^{-1}$  and  $-198.0 \pm 261.6 \text{ gC m}^{-2}\text{yr}^{-1}$ representing an extreme range of 5x the value for CARB-CAR forest carbon sequestration 214



relative to the NEE1 population data<sup>65</sup>. The difference in mean values between the two 215

216 populations is significant at the 95% confidence level, rejecting the null hypothesis that

217 the CARB-CAR population mean falls within the NEE1 population mean. The error of

over-estimation is ~79% for the CARB-CAR protocol based on the populations sampled. 218

219 The corresponding reduction in precision (standard deviation) for the CARB-CAR

220 population is ~82% relative to the NEE1 population. Both populations exhibit positive

221 emission values to the atmosphere; the CARB-CAR data are comprised of 3 positive

222 values (maximum = 771.5 gC m<sup>-2</sup>yr<sup>-1</sup>, CAR676) compared to 116 NEE1 positive values

223  $(maximum = 1269.1 gC m^{-2}yr^{-1}, US-Miz).$ 

Given the large difference in sample means for the CARB-CAR and NEE1 datasets it is 224

225 conjectured that the true population means are also significantly different. The null

hypothesis is set that the two sample populations were drawn from the same underlying 226

population of annual values. In Figure 2 a plot of the 95% confidence interval for the 227

difference in means between the CARB-CAR and NEE165 annual measurements for all 228

years available and for the selected years of 2007 and 2008 is shown. The combined data 229

230 set consists of 340 CARB-CAR and 540 NEE1 data points ("Total"), each reported as

representing an annual cycle determined by each methodology. A formula for a large-231

232 sample confidence interval (Methods) is used for the bar labeled "Total"; no assumption

233 on equal standard deviations between the two data sets has been made. Amongst the

234 years with overlapping data (2001-2014), we choose 2007 and 2008, as they have the

largest number of combined sample points, 65 in 2007 (23 for ARB and 42 for NEE1) and 235

65 in 2008 (24 for ARB and 41 for NEE1). The top and bottom of the open bars represent 236

the range of the difference between the CARB-CAR and the NEE1 means with a 95% 237

confidence level. The filled square symbol below each bar represents the 5% estimation 238

error allowed by CARB-CAR. The null hypothesis that the two data sets come from the 239

same population is rejected. The 5% estimation error does not overlap with the 95% 240

241 confidence interval demonstrating that the CARB-CAR estimates are more than the

allowed 5% from the NEE1 measurements. The standard deviation for the CARB-CAR 242

243 data is very large compared to the NEE1 standard deviation, irrespective of the year. For

244 example, in 2008, the standard deviations for CARB-CAR and NEE1 were respectively, 245

1,170 and 255 gC m<sup>-2</sup>yr<sup>-1</sup>, a 5x over-estimation difference. This leads to a very wide

confidence interval that also establishes that the CARB-CAR project data are invalid 246

247 based on the permitted 5% compliance margin of error. To our knowledge, no CARB-

CAR compliance testing of project results has been reported. 248

249 Figure 3 shows a time interval plot of CARB-CAR annual data from 2002 to 2015 and

250 NEE1 annual measurements<sup>65</sup> from 1992 to 2015 to further test the invalidation of CARB-

251 CAR offsets according to the 5% invalidation compliance rule. The averages for the two

252 data sets are shown by each vertical bar representing forest carbon sequestration



calculated annually over all available locations. The selected intervals are absent first year 253 254 data for the CARB-CAR population to present a conservative case for testing the null hypothesis. The year 2006 was selected, in which the largest average carbon offset by 255 CARB-CAR sites (n = 12) has been recorded, namely -2,038 gC m<sup>-2</sup>yr<sup>-1</sup>, and apply the 256 corresponding 5% admissible error of 101.9 gC m<sup>-2</sup>yr<sup>-1</sup> to all CARB-CAR years, shown as 257 258 error bars for each CARB-CAR year. No intersection between the admissible interval and the actual NEE1 measurements for any of the overlapping years (2001-2015) is observed. 259 In addition, note the general consistency of the NEE1 averages through the interval 260 261 versus the comparatively large year-to-year fluctuations observed for the CARB-CAR dataset that are not consistent with natural ecosystem carbon sequestration values. The 262 null hypothesis is rejected indicating that the CARB-CAR data are invalid by exceeding 263 264 the 5% validation compliance threshold for the years represented in this analysis.

265 Next, a detailed comparison between the population data sets, year by year, to further 266 test the 5% invalidation threshold for the CARB-CAR data is presented. Table II shows the results of a hypothesis test with a null hypothesis that the difference between the 267 CARB-CAR and the NEE1 annual means is under the allowed 5% threshold. The test is 268 performed separately for all years between 2002 and 2015; p-values are recorded in the 269 270 last two rows of Table II. The p-values range from 0.00 to 0.065. Typically, p-values 271 smaller than 5 to 10% demonstrate a rejection of the null hypothesis. The results reject that the estimation error is within the allowed 5% value, with three exceptions. In the case 272 273 of years 2004, 2013 and 2014, the p-values are higher than 5% (6.53%, 5.48% and 5.24%). In the case of years with p-values > 5% (2004; p = 0.065, 2013; p = 0.055, 2014; p = 0.052) 274 275 the probability that the CARB-CAR data were not out of the norm is only  $1.87 \times 10^{-4}$  %, 276 supporting the null hypothesis rejection.

#### 3. Discussion

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278 Results of the protocol review (Table I) and statistical tests (Figs. 1- 3) challenge the 279 scientific basis of the CARB-CAR protocols for determination of NEE, the efficacy of compliance testing, and suitability for global carbon currency financial transactions. The 280 analysis and assumptions were guided by the absence of CARB-CAR direct measurement 281 of molecular CO<sub>2</sub> to validate, at the program level, widely employed estimation protocols 282 283 and regulatory compliance testing. Irrespective of geographic location, project type and 284 size of land area analyzed, results of the statistical analysis reject the null hypothesis that 285 the population of annual means for CARB-CAR lies within the boundaries of the directly measured NEE1 population of annual means (e.g., CARB-CAR and NEE1 annual mean 286 and SD are  $-948.8 \pm 1,504.8$  gC m<sup>-2</sup>yr<sup>-1</sup> and  $-198.0 \pm 261.6$  gC m<sup>-2</sup>yr<sup>-1</sup>, respectively). The 287 population mean and standard deviation for CARB-CAR data are linked to arbitrary and 288 inconsistent features of the project protocols (e.g., exclusion of soil carbon pool, Table I) 289



resulting in over-estimation errors for NEE of up to ~79 % and a reduction in precision of 290 291 ~5x relative to the NEE1 population (e.g., difference in standard deviations), documenting irreconcilable differences between the respective methodologies. The 292 293 CARB-CAR method, based on averages of spatial observations for representative forest plots across a project area, would be expected to exhibit less variance compared to NEE1 294 295 results (e.g., single or multiple NEE observation platforms), however, the opposite trend is observed. The exclusion of the soil carbon pool (Table 1) renders CARB-CAR net carbon 296 297 balance incomplete and invalid, consistent with the statistical results. The soil carbon 298 pool is critical to understanding carbon dynamics, a factor of importance to all 299 stakeholders (e.g., landowners, carbon vendors, policymakers). For example, the ratio of night-time ecosystem respiration to gross primary production is rising across the 300 FLUXNET2015 dataset population<sup>74</sup> suggesting that global soil respiration (e.g., 301 302 heterotrophic) is responding to climate and environmental factors, a trend not observable 303 with CARB-CAR protocols; these trends cannot be detected or quantified with traditional 304 protocols. The consequences of forest carbon protocol invalidation (e.g., CARB, CAR, 305 CDM, ACR, VCS, GS) cannot be underestimated as they are employed in response to legislation (e.g., AB32<sup>51</sup>) and are the foundation for monetization of carbon operations of 306 307 the United Nations Reducing Emissions from Deforestation and Forest Degradation (UN-REDD, REDD+) program<sup>75</sup> and proposed carbon offset trading within the Paris 308 Agreeement<sup>16</sup>. CARB-CAR transactions involving approximately 1.3M acres (~0.53M 309 310 hectares) represent a minor fraction of < ~0.2% of available US forest area of ~766M acres (~310M hectares)<sup>76</sup>. Corresponding market share of offset volume for CARB-CAR forest 311 312 carbon product in 2016 is estimated at ~3 % representing ~2 million tCO<sub>2</sub>e compared to 63.4 million tCO<sub>2</sub>e for voluntary forest carbon transactions<sup>77</sup>. The low CARB-CAR forest 313 program adoption rate and offset volume reflect the cost, constraints and risk of 314 invalidation intrinsic to the CARB-CAR forest carbon offset program<sup>78,79</sup>. Results of the 315 statistical analysis, documentation of absence for direct CO2 validation, and 316 317 demonstration of exclusion for the soil carbon pool, converge on invalidation of net 318 emission reduction claims and resulting financial products by CARB-CAR protocols.

319 Our results are supported by updated NEE analysis (1,163 site years, covering 155 global sites) reporting a mean and SD of -156  $\pm$  284 gC m<sup>-2</sup>yr<sup>-1</sup>, respectively<sup>41</sup>.; these annual data 320 are inclusive of the NEE165 results reported herein but lack detailed statistical analysis 321 322 and tabulated values for ecosystem photosynthesis and respiration. The expanded NEE 323 comparative population of annual data<sup>41,65</sup> represent upper (e.g., net positive CO<sub>2</sub> to the atmosphere) and lower boundaries (e.g., extreme net carbon sequestration) of the natural 324 325 range for net forest carbon flux across global, diverse forest ecosystems. The CARB-CAR population does not reflect negative or positive annual values of reported known natural 326 327 ranges for NEE<sup>41,65</sup>. The multiple null hypothesis rejections employing all annual values (Figure 1 (a), (b)), annual values excluding initial-year values (Figure 3), and overlapping 328



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segments of the values (Figure 3, Table I) addressing the 5% invalidation rule, we argue 329 that the ~111 million CARB-CAR forest carbon offset credits issued and pending<sup>60</sup>, valued 330 at ~ \$1B USD (estimated using a 2015 average price of \$9.70 USD per offset credit<sup>80</sup>), are 331 invalid in the absence of observation and measurement of CO<sub>2</sub>. Accordingly, buffer pools 332 of CARB-CAR offsets to mitigate invalidated project outcomes are of limited value for 333 334 compliance enforcement. We know of no alternative method to test CARB-CAR projects for compliance (e.g., 5% invalidation rule) other than by the statistical analysis presented. 335 Examples of minimum forest mensuration methods to determine NEE, comparable to 336 eddy covariance results<sup>69,81,82</sup>, reveal the insuperable shortcomings of the CARB-CAR 337 methods (Methods) relative to the complexity of annual and interannual forest carbon 338 339 dynamics and the validation requirement for carbon financial products. Cost factors 340 prohibit annual forest mensuration, including measurement of soil and ecosystem respiration, required to improve and validate CARB-CAR project reporting relative to 341 eddy covariance results for NEE. Such costs would be in addition to the existing costs for 342 343 landowners noted for carbon offsets<sup>78,83,84</sup>. Recognizing the urgency in utilizing and quantifying<sup>41,85</sup> all available strategies to manage atmospheric CO<sub>2</sub> and the availability of 344 land for reforestation, improved, cost-effective, harmonized protocols for forest carbon 345 346 sequestration are required to fulfill the objectives of climate change policy<sup>5</sup> and carbon financial markets<sup>19</sup>. 347

**Protocol Process**. Annual NEE is typically calculated from 30" observation intervals based on CO<sub>2</sub> measurement acquired at 10 Hz referenced against universal internal and external gas standards employed for CO<sub>2</sub> analyzers (Methods). The raw CO<sub>2</sub> data are checked for quality and archived for public access<sup>86</sup>. In contrast, the CARB-CAR (Table I, footnote 1) and related protocol reporting process is inconsistently applied across project reporting years and is not subject to quality checks against shared standards and references<sup>49</sup>. Selected CARB-CAR projects inconsistently apply carbon accounting methods across project years, for example, conflating timber inventory with annual net carbon determination (e.g., gC m<sup>-2</sup>yr<sup>-1</sup>) for initial years resulting in anomalous values (Figure 1 (a), Table I, 31 instances). Annual NEE1<sup>65</sup> data are devoid of similar outliers as only net flux of CO<sub>2</sub> is used in its determination for each year (Figure 1 (b)). Every year is treated in the same way; there is no "first year effect" upon initiation of NEE forest monitoring. In contrast selected CARB-CAR initial-year data derived by estimation<sup>53 87</sup> is treated differently than subsequent vintage years. Such initial year data may represent aggregate carbon sequestration that might have occurred prior to the project and that while reported as a single vintage year or less (Table I), cannot be verified as having occurred in any given annual interval(s). To avoid mis-representation as a single annual net carbon sequestration value, as it is currently defined<sup>52</sup>, this value should be removed from calculated sequestered carbon accounting due to the uncertainty and arbitrary time value assigned to this component of the CARB-CAR protocol. CARB-CAR protocol



reporting inconsistencies compound the issues of validation and reliability for stakeholders. For example, vintage year discrepancies appear to increase with newer projects (Table I) and are concentrated in California (Supplement 1), suggesting less stringent application of the CARB-CAR protocol process and a retraction of spatial and ecological representation across the US.

Soil Carbon Exclusion. CARB-CAR projects categorically exclude the soil CO<sub>2</sub> and 373 related carbon pools<sup>55</sup> (e.g., RF-6, IFM-6, AC-6, Methods, Table I), the primary 374 component of ecosystem respiration and determinant of NEE<sup>65,87,88</sup>. Soil carbon content 375 represents up to three times the magnitude of above ground carbon composition and up 376 to ~80% of ecosystem carbon exchange<sup>41,87–89</sup>; it cannot be excluded from a complete, 377 scientifically valid, net material carbon balance<sup>90–92</sup> for a forest project. In the case of 378 379 CARB-CAR avoided carbon (e.g., AC) projects, specific to wetlands, while sampling of bulk soil carbon is recommended<sup>93</sup>, a corresponding term for soil carbon and CO<sub>2</sub> efflux 380 (e.g., AC-6) is excluded from calculation of net GHG reduction (Table I). The NEE1 381 observations reported here are calculated using data for ecosystem respiration (R<sub>eco</sub>) and 382 Gross Primary Productivity (GPP) (e.g., NEE=GPP - R<sub>eco</sub>)<sup>65</sup>. The R<sub>eco</sub> to GPP ratio (e.g., 383  $R_{eco}$ / GPP) for the NEE1 sites yield a mean of  $0.79 \pm 0.29$  gC m<sup>-2</sup>yr<sup>-1</sup> (n = 50)<sup>65</sup>, emphasizing 384 385 the importance of soil and ecosystem respiration, accounting for up to ~79% of the NEE, in determination of accurate net forest carbon sequestration. The tight coupling between 386 GPP and Reco is supported by an expanded NEE data set<sup>41</sup>. It follows that CARB-CAR 387 results are in excess by at least the magnitude of soil carbon efflux or ecosystem 388 respiration for each of the CARB-CAR sites, identifying a systemic bias of carbon excess 389 390 and error in CARB-CAR and related protocols. The lack of direct observation of CO<sub>2</sub> 391 fluxes inherent in the CARB-CAR and related protocols in which credit offsets are created by model forecast (e.g., ex-ante) impose systemic and insuperable invalidation risk for the 392 CARB-CAR results. CARB-CAR carbon accounting errors result in loss of atmospheric 393 394 benefit and carbon asset value, established through carbon market transactions to 395 landowners, offset buyers and sponsoring entities (e.g., the State of California). 396 Moreover, the CARB-CAR credit offsets do not satisfy the ARB Compliance Offset 397 Protocol for U.S. Forest Projects requirement that net greenhouse gas reductions are accounted for in a complete, consistent, transparent, accurate and conservative 398 399 manner<sup>54,55,57</sup>. Accordingly, the CARB-CAR forest offset credit products (e.g., offsets defined by serial number (Table I)), lacking soil CO<sub>2</sub> balance, are not suitable as the basis 400 401 for commercial net carbon financial transactions posing a barrier to effective management 402 of atmospheric CO<sub>2</sub>, loss of credit issuance value, and program acceptance.

Exclusion of the soil carbon pool in CARB-CAR protocols impose additional methodological uncertainty by the requirement of a 100-year invariant project baseline to ensure forest carbon storage permanence<sup>54,55,58</sup>. In contradistinction to the CARB-CAR



406 rationale of invariant soil carbon over a 100-year project interval, numerous studies 407 suggest that loss of soil carbon due to surface warming cannot be ignored. Soil warming and related CO<sub>2</sub> efflux predictions, including feedbacks to the biosphere<sup>94</sup>, vary over the 408 coming decades<sup>95–99</sup> but they typically deny the assumption that the soil carbon pool will 409 remain invariant over the 100-year required project interval<sup>92,98</sup>. The global soil-to-410 atmosphere (e.g., total soil respiration) CO<sub>2</sub> flux, driven by climate change, is increasing 411 across diverse contemporaneous ecosystems98, a trend supported by a series of NEE 412 observation platforms<sup>100,101</sup>. Lack of direct observation of soil and ecosystem respiration 413 414 over project lifetimes of 100 years, as defined by the CARB-CAR protocols and required of products<sup>54,55,57</sup>, result in additional uncertainty for net forest carbon sequestration data 415 over the coming decades, a dimension critical for verification of decadal forest carbon 416 storage and management of atmospheric CO<sub>2</sub><sup>5,41,85</sup>. Moreover, direct measurement of the 417 forest soil carbon pool is a critical ecosystem diagnostic for detection of transition from 418 net carbon sequestration to net positive carbon emissions to the atmosphere due to 419 420 anthropogenic encroachment and climate change. Six NEE165 locations (Supplement 3, 421 Table 2; CA-Man, CA-Qfo, JP-Wat, JP-Tef, US-Uaf, US-Pfa) were observed as net positive CO<sub>2</sub> forests whereas no similar CARB-CAR project sites were identified suggesting 422 423 insensitivity to or bias against CO<sub>2</sub> positive emission sites. Eddy covariance and additional methods for partitioning soil CO<sub>2</sub> efflux, relative to NEE, as a diagnostic for 424 climate change impact are readily achievable by measurement of CO<sub>2</sub> isotopologues<sup>iii</sup> 425 including  $^{13}\text{CO}_2^{102,103}$  and  $^{14}\text{CO}_2^{104-106}$ . Based on our analysis, CARB-CAR and related 426 protocols cannot differentiate net-negative to net-positive CO<sub>2</sub> forest emissions, a critical 427 428 test for forest carbon protocols.

Howland Forest Site Method Comparison. The Howland Research Forest Carbon 429 Project (CAR681<sup>107</sup>), the only case in which CARB-CAR and NEE1 data are available for 430 the same project location, approximate land area, and across shared annual time intervals 431 432 (2003 – 2013) is described. The Howland Research Forest (Howland) is the second oldest AmeriFlux site in the US<sup>82</sup> with an established 20 year record of eddy covariance data 433 and NEE<sup>108</sup> determination, process-based model development<sup>109</sup> as well as independent 434 direct measurement of soil CO2 efflux and ecosystem respiration87, response to 435 shelterwood harvest<sup>110</sup> and diverse ecological data<sup>87</sup>. The Howland Forest site for both 436 NEE1 and CARB-CAR covers ~223 hectares (2.23 km<sup>2</sup>) an area represented by eddy 437 covariance<sup>111</sup> and forest survey. The Howland CARB-CAR project (CAR681, Table I) 438 439 identifies vintage years for 2008 to 2013 as hindcasted and reported in 2014 (supporting CARB-CAR documents are available on the CAR project documents page<sup>112</sup> cited in Table 440 I). CAR681 excludes soil carbon (Table 1) (FM-6)<sup>55</sup> (Project Design Document, pp. 10, 441 442 19<sup>112</sup>). The CARB-CAR model protocol involved growing and de-growing vegetation, 443 slowing growth rates below that prescribed by the FVS proxy defaults and running the model forward and backward<sup>112</sup> (Table I). Average NEE1 seasonal data for the years 1996 444



to 200282, preceding the CARB-CAR Howland series by six years, were incorporated in 445 the CARB-CAR vegetation model (Project Design Document<sup>112</sup>). CARB-CAR data 446 reported for ~3 months of 2008, the initial-year of the Howland project, reports net carbon 447 sequestration of -43,787.2 tCO<sub>2</sub>e, or -5,338.7 gC m<sup>-2</sup>yr<sup>-1</sup> 112, 25 times in excess of the 448 reported population mean NEE1 data (e.g., -207.99 gC m<sup>-2</sup> yr<sup>-2</sup>). Subsequent years, 2009 449 to 2013, report CARB-CAR net forest carbon sequestration as invariant with exact values 450 of -1,033.00 tCO<sub>2</sub>e, or -127.50 gC m<sup>-2</sup>yr<sup>-1</sup> 112 The CAR681 project data were verified by 451 independent audit confirming net sequestration of 48,852 tCO2e over the reporting 452 period<sup>112</sup>. In contrast, NEE1 initial-year data for Howland determined by eddy covariance 453 for the year 2008<sup>108</sup> was -287.1 gC m<sup>-2</sup>yr<sup>-1</sup>, ~19 times smaller compared to the CARB-CAR 454 result for that year, or an over-estimation error of ~95%, relative to the ARB initial-year 455 456 value and invalid according to the 5% excess threshold criteria for that vintage year. The 457 initial-year (i.e., 2008) CARB-CAR value represents 95% of the total Howland CARB-CAR sequestration, invalidating carbon offset issuance for the time interval. NEE1 values for 458 459 the years 2009 to 2013 ranged from -191.9 to -330.9 gC m<sup>-2</sup>yr<sup>-1</sup> with a mean and standard 460 deviation of -255.02 ± 57.7 gC m<sup>-2</sup>yr<sup>-1</sup>, respectively <sup>108</sup>. The reported CARB-CAR 461 subsequent year data are in error, on average by 50% less, compared to the NEE1 data, 462 an exception for the CARB-CAR population. The CARB-CAR annual values were reduced by slowing the FVS growth rate to avoid the 5% invalidation threshold (Project 463 Design Document<sup>107</sup>) excepting the initial-year. The Howland forest NEE1 data increased 464 465 by ~ 6 gC m<sup>-2</sup> yr<sup>-1</sup> over the last 19 years, representing ~50% overall increase of forest carbon sequestration, a trend not evident in the CARB-CAR data and emphasizing the 466 importance of trend detection for carbon sequestering ecosystems. Total ecosystem 467 respiration for Howland accounted for ~87% of NEE for the years 1997 to 2002<sup>108</sup> and 468 ~79% for the year 200889 implying that debits of similar magnitude should be applied to 469 the CARB-CAR data summary by their exclusion. 470

471 Additional error for Howland CAR681 is noted for above ground carbon determination. For example, above ground standing biomass for Howland of 31 tC ha-1 (e.g., tons 472 carbon) determined by the CARB-CAR common practice method for the project<sup>112</sup> is ~4 473 474 to 5 times smaller compared to the 119 – 150 tC ha<sup>-1</sup> reported for above ground biomass determined by the Howland forest survey<sup>108</sup>, potentially resulting in net excess carbon 475 sequestration (e.g., less above ground photosynthetic uptake of CO<sub>2</sub>) when corrected for 476 477 soil CO<sub>2</sub> efflux or ecosystem respiration over the project area. The Howland forest offers detailed information on the impact of non-climate related land use history and forest 478 479 recovery<sup>113</sup> emphasizing the limitation and potential error of baseline scenarios and initial-year carbon offset values derived from counterfactual arguments as applied to 480 CAR681 and intrinsic to CARB-CAR and related protocols<sup>49</sup> (Table 1, Supplement 1, 2). 481 482 Comparison of the CAR681 and Howland NEE1 results identify systemic uncertainties 483 for the CARB-CAR method and protocol including: 1) absence of direct, high frequency



484 molecular CO<sub>2</sub> measurement to determine annual NEE, 2) mis-representation of initial-485 year project vintage as annual net forest carbon sequestration and exceeding the 5% invalidation threshold, 3) arbitrary adjustment of model growth forecasts by forward and 486 backward model run, 4) exclusion of terms for the soil carbon pool (e.g., soil carbon efflux 487 and ecosystem respiration), 5) error in reporting of standing biomass incorporated in 488 489 baseline counterfactual estimation, vegetation proxies and models, 6) verification and audit reporting that does not validate project results relative to independent direct 490 measurement of net forest carbon, and, 7) project level data that cannot be verified as the 491 492 basis for forest carbon financial products and related carbon market transactions. The anomalies noted for CARB-CAR sites (Table I) document non-standard, shifting protocol 493 operations (e.g., arbitrary model operation to hindcast and forecast annual net forest 494 495 carbon) and inconsistent reporting for the CARB-CAR and related protocols. Point three, 496 above, is emphasized recognizing the lack of spatial and annual resolution provided by 497 FVS analysis frameworks introducing errors of up to ~55% in calculation of annual 498 changes in standing biomass for above ground carbon stock<sup>90,114–116</sup> such as observed for 499 Howland681. Similar errors likely apply to the population of CARB-CAR projects 500 reporting given that sequential, annual forest mensuration survey is not required or 501 routinely practiced to determine corresponding annual vintage year carbon sequestration differences. Errors of exclusion for soil CO<sub>2</sub> as ecosystem respiration of up to ~80% and 502 error in above ground carbon determination must be acknowledged in the model based 503 approach common to the CARB-CAR<sup>54,55,58</sup> and related protocols. The combined error 504 for the CARB-CAR protocol, considering the error terms to account for ecosystem 505 506 respiration and above ground biomass determination, respectively, is estimated at up to ~135%. 507

CO<sub>2</sub> Forest Reduction Policies. The uncertainties described above apply to policy 508 509 development, policy driven programs and associated carbon pricing trends involved in 510 large-scale forest carbon projects, such as the UN-REDD and REDD+75. The UN-REDD and REDD+ approved projects rely on the Verified Carbon Standard<sup>63</sup> (VCS) sharing 511 fundamental estimation equations and features with the CARB-CAR protocols discussed 512 513 (Supplement 2). Additionally, methodologies developed under the United Nations CDM accepts projects and programs registered and approved by the VCS<sup>75</sup>. For example, the 514 VCS method VM0007 REDD+ Methodology Framework (REDD-MF), v1.5<sup>117</sup>, provides 515 quantification of emission reductions from avoided conversion of forest. However, 516 VM0007, and related VCS REDD and REDD+ protocols, rely upon similar underlying 517 FVS and model simulation approaches as employed for the CARB-CAR population 518 reported here. Technical reports for REDD VCS applications categorically exclude forest 519 520 soil carbon and respiration (e.g., AC-6) from carbon pool accounting 118 (Table 1). In 521 addition, REDD VCS applications cannot accommodate CH<sub>4</sub> and N<sub>2</sub>O emissions expected from forest environments with lakes, wetland and peat features compounding the 522



uncertainty in reported emission reductions for avoided conversion projects<sup>119,120</sup>. 523 524 Results for REDD and REDD+ net forest carbon sequestration may not be verifiable or capable of identifying net annual ecosystem carbon change in response to reduced 525 deforestation, climate and anthropogenic forcing, and may not be well suited for carbon 526 pricing and trading of carbon financial instruments, based on CARB-CAR shared 527 528 protocols. The implementation of REDD+ in Ghana, Africa, for example, is subject to impacts of invalidation for REDD+ projects now in operation and in the planning 529 stages<sup>121–123</sup> including World Bank sponsored bond programs similar to that operating in 530 531 Kenya<sup>123</sup> also based on VCS protocols. Current macroeconomic trends for voluntary 532 carbon trading markets are reflected in REDD/REDD+ programs. For example, 2016 prices for forest carbon were the lowest for REDD/REDD+ projects, averaging \$4.60 tCO<sub>2</sub>e 533 534 on the largest volume of all project types<sup>80</sup>. Moreover, VCS protocol projects were characterized consistently by the lowest pricing of \$4.10 tCO<sub>2</sub>e on the largest volume of 535 all standards employed for forest projects<sup>80</sup>. Transaction volume (millions tons CO<sub>2</sub>e) for 536 537 forest carbon offsets fell ~40% from 2014 to 2016<sup>80</sup>. We suggest that the low prices for 538 REDD+ and VCS are, in part, related to the uncertainty and risk of unverifiable net carbon 539 sequestration results for these operations. In contrast, CARB-CAR pricing of ~\$9.70USD 540 tCO<sub>2</sub>e for 2015 compliance offsets<sup>80</sup>, emphasize the asymmetry in carbon pricing; similar uncertainties apply to REDD+ (e.g., voluntary) and CARB-CAR (e.g., compliance) forest 541 carbon offsets. REDD+ funding as a catalyst for expansion of forest carbon sequestration 542 543 projects has been slow to materialize. As of mid-2017, ~\$218M out of \$2.9B in funding for REDD+ programs have been disbursed<sup>80</sup>. We argue here that reduced disbursement for 544 545 REDD+ projects also reflect the uncertainty of project carbon asset values intrinsic to estimation protocols. In contrast, direct measurement of forest CO<sub>2</sub> flux (e.g., NEE) 546 provides landowners with in situ, time resolved project data as a foundation for annual 547 revenue of verified net sequestered forest carbon. While carbon pricing and carbon 548 549 accounting methodologies are constrained by estimation based accounting frameworks, 550 carbon trading platforms and pricing initiatives are rapidly expanding (e.g., 45 national, 551 25 subnational jurisdictions<sup>124</sup>) emphasizing the importance of shared methodology for forest carbon sequestration product offerings for expanding trading platforms. Although 552 553 it is not clear how REDD+ will be integrated within the Paris Agreement (e.g., Article 6)<sup>125</sup> or into existing compliance markets<sup>126</sup>, improved quantification of forest carbon 554 555 sequestration links these entities and mechanisms together in a harmonized universal 556 science-based transactional framework. For example, forest carbon offsets sourced in China are verified and traded as equivalent to those originating from Africa, the United 557 States, Canada, Mexico and other national and sub-national platforms, potentially 558 559 improving market liquidity and reducing costs of compliance<sup>127</sup>.

Eddy Covariance Technology Innovation. The insuperable problems of existing estimation-based protocols for net forest carbon sequestration are achievable with



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existing technology and scientific methods. The eddy covariance method employed at the Howland Forest and NEE1 sites has been applied worldwide as standalone field installations for research purposes<sup>128–130</sup> in combination with remote sensing<sup>131,132</sup> and as research networks<sup>133-136</sup> not only for bulk CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O but, in select cases, for corresponding isotopologues. Carbon isotopologues offer additional criteria for ecosystem function and net forest greenhouse gas sequestration that cannot be addressed by CARB-CAR and related estimation protocols. In contrast to estimation-based protocols that cannot feasibly conduct interannual and annual comprehensive forest mensuration protocols due to prohibitive cost factors, NEE for CO<sub>2</sub> determined by eddy covariance integrates all vertical carbon fluxes (e.g., assimilation and respiration) in 30" intervals, typically representing the average of 10 Hz CO<sub>2</sub> measurements<sup>129</sup>, offering the key outcome of net forest carbon sequestration (e.g., NEE as gC m<sup>-2</sup>yr<sup>-1</sup>) over a given time interval and project landscape. The existing NEE flux towers and data base represents a significant achievement by the scientific community and available as a baseline for expansion of similar efforts to manage forest carbon projects. The eddy covariance method is identified by the IPCC<sup>137</sup> as a forest carbon sequestration methodology but has not been updated to account for instrumentation improvements and large scale innovative forest applications. Eddy covariance networks are not typically interconnected in real-time or applied across large project areas for creating universal commercial forest carbon financial products. Commercial development of low-cost eddy covariance networks with innovative features, including unmanned aerial vehicles 138,139, shared data networks<sup>140</sup> and automated reporting is achievable offering an alternative to estimation protocols currently in use. Advancements in blockchain accounting platforms<sup>141</sup>, artificial intelligence<sup>142</sup> and the internet of things<sup>143</sup> can be readily integrated within eddy covariance networks but for the reasons we discuss here cannot be successful without direct measurement of CO<sub>2</sub>. Key and confounding concepts of additionality and leakage<sup>53</sup> embedded in the CARB-CAR and related protocols could be improved with directly quantified forest carbon results for aggregated project areas. Eddy covariance as an instrumental method has characteristic limitations and uncertainties<sup>144</sup> and faces engineering challenges for large-scale deployment<sup>145</sup> and spatial replication essential for statistically robust fluxes of ecosystems<sup>146</sup>. Limitations of commercialization for eddy covariance technology and techniques can be resolved by improved engineering and development efforts (e.g., density and location of EC platforms, automated reporting, artificial intelligence) with cost reduction. NEE offers three-gas global warming potential budgets for CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O, essential for a realistic assessment of GHG management that while recognized is lacking<sup>147</sup> and unachievable with CARB-CAR protocols, as the next step in the evolution of forest carbon financial products.

Given the feasibility of employing eddy covariance networks, expanding carbon market exchanges<sup>124</sup> and the abundance of deforested landscapes, we suggest that standard



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methods and protocols be adopted for forest carbon financial products across project 601 602 locations that: 1) are based on direct measurement of molecular CO<sub>2</sub> forest flux, 2) employ shared gas standards (e.g., World Meteorological Organization<sup>148</sup>) for CO<sub>2</sub> analyzers and 603 for global reference frameworks<sup>149</sup>, 3) employ standardized protocols, model 604 parametrizations and criteria such as that established by the Integrated Carbon 605 Observation System<sup>150–152</sup> (ICOS) and the Global Atmosphere Watch<sup>153</sup>, and, 4) establish 606 universal measurement-based criteria for the transformation of NEE forest carbon offset 607 products to verified carbon financial transactions. Without direct measurement, 608 609 standardization and harmonization of forest carbon offsets across international carbon trading platforms, efforts to restore forests and protect Indigenous Peoples land rights 610 and stored carbon, will continue to decline, hinder economically viable markets and slow 611 612 efforts to manage global warming. Furthermore, lacking direct observation of CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O, CARB-CAR protocols cannot contribute to the scientific community to improve 613 carbon cycle models and related ecosystem and climate change science. Eddy covariance 614 615 observation platforms, as suggested here, would provide new data where few such data 616 exist (e.g., Africa<sup>154</sup>). We acknowledge the limitations of this study related to the small 617 sample sizes and annual intervals presented, limited overlapping project sites, and 618 differences in methodological spatial definition for CARB-CAR and NEE1. Despite study limitations, discrepancies between methods that rely on estimation (i.e., unobserved CO<sub>2</sub> 619 flux, CARB-CAR) and direct measurement of forest CO<sub>2</sub> flux (NEE1) must be addressed 620 621 for scientific, economic and policy validation and to offer achievable improvements to existing forest carbon protocols. The results presented here form a basis for ongoing 622 623 comparison between CARB-CAR and NEE results. CARB-CAR sites can and should be tested employing NEE for validation and compliance reporting. 624

In conclusion, based on review and analysis of population differences with directly measured forest carbon sequestration as NEE (e.g., NEE1) we show that efforts by the CARB-CAR and related protocols have not verifiably measured, managed, tested for compliance or monetized net sequestered forest carbon. Results of the statistical analysis and demonstration of exclusion of the soil carbon pool by CARB-CAR protocols call into question the scientific validity of estimation-based protocols for net forest carbon. We do not make the case that forest carbon estimation methods should be eliminated, but that to employ them to claim verified reductions for net annual forest CO<sub>2</sub> sequestration, they must be validated by direct measurement. Without direct and verifiable measurement of forest CO<sub>2</sub> flux, as demonstrated by the extensive NEE sites across the world, we cannot expect or hope to manage local, regional and global forest growth for reforestation, sustainability and net carbon sequestration, an ~1-2 billion-hectare biospheric and economic opportunity (e.g., jobs, business revenue). Forest carbon protocols that do not directly observe and quantify CO<sub>2</sub> gross and net CO<sub>2</sub> flux cannot support verifiable data for financial markets or effective policy and legislative development. While an



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invalidation provision may be regarded as a conservative measure (e.g., 5% invalidation threshold<sup>59</sup>), routine tests of compliance and enforcement of the 5% invalidation value using independent measurement have not been applied within the AB32 legislation as implemented by the CARB-CAR and related protocols. The ACR, CDM, VCS and GS, impose no validation and compliance provisions with any form of directly measured forest CO<sub>2</sub>, uncoupling results from the possibility of independent measurement verification. Measurement and standardized methods are hallmarks of the Montreal Protocol to monitor and enforce the reduction in emission of chlorofluorocarbons demonstrating the success of collective action within a common analytical framework 155-<sup>157</sup>. Nothing less is required to advance forest carbon management, financial markets and their local-to-global benefits given the steady decline of intact forests, Indigenous Peoples land rights, and contemporary carbon market value. Moreover, the demise of the Chicago Climate Exchange<sup>158</sup>, coincident with near zero-dollar value for forest carbon<sup>159</sup>, offers a lesson learned that without measurement and accountability, institutional frameworks are vulnerable to economic and policy failure<sup>160</sup> and fraud<sup>161</sup>. Unnecessary carbon offset risk, supported largely by state and government subsidies and legislation, impose loss of opportunity for forest carbon storage and market capitalization, none of which can be regained<sup>160</sup>; the harm in time lost to manage surface warming is incalculable. The scientific basis for and application of forest carbon measurement (e.g., eddy covariance) are mature disciplines readily adapted to large-scale implementation through technology innovation and reduction in cost. Project specific climate finance and monetization mechanisms are a key but unspecified component of the Paris Agreement that if combined with direct measurement of forest CO<sub>2</sub> will benefit societies and economies in the coming decades and prove crucial to correcting the imbalance between nature and anthropogenic activity and resulting climate change.

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## 4.0 Survey and Analysis Methods

Data Sources. The focus of this study was limited to characterizing differences between populations of individual annual values for net sequestered forest carbon; inter-annual values and annual time series carbon values are not considered. Use of annual data represent consistent application of both methods for each annual interval considered; units of gC m<sup>-2</sup>yr<sup>-1</sup> are compared for both datasets as reported (or converted). All data are available in published records as noted. NEE populations consisting of single and multi-year values have been employed to characterize NEE<sup>74,152,162</sup>. The CARB-CAR dataset consists of 340 sample points spanning the years 2001-2014. The NEE1 dataset consists of 544 sample points spanning over the years 1992-2015. Pooled population values and population values segmented across the time domain of the annual records are employed to explore differences between the datasets. The results are based on two



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data sources: 1) Jointly published California Air Resources Board (ARB) and the Climate Action Reserve (CAR) (CARB-CAR) data<sup>52</sup>, and, 2) a published analysis and synthesis of eddy covariance data<sup>65</sup> and annual data for each site reported as extracted from references therein<sup>65</sup> to determine annual net CO<sub>2</sub> for selected project sites (NEE1). Additional data for the Howland Forest (CARB-CAR671, NEE1-Ho1) covering the years 2008 to 2013 that were not included in the NEE1 dataset were obtained from an additional publication<sup>108</sup>; these values are not included in the summary statistics reported The study was restricted to results for CARB-CAR forest carbon data that have been identified by specific serial numbers assigned to CARB issued carbon offsets (Table I). Results for the American Carbon Registry<sup>62</sup> and the Verified Carbon Standard<sup>63</sup>, both approved project registries by the ARB52, were reviewed but were not included in this study. ACR project data was not available in summary format for carbon offsets presenting a challenge to independently compile and verify ACR results. A total of 55 ACR forest carbon projects are listed; 18 identify values for registered carbon credits but serial numbers for ARB issued offsets are not available<sup>62</sup>. The VCS identifies 12 proposed forest projects; one project is identified as in progress<sup>163</sup>. VCS offset credit summaries and serial numbers for ARB issued offsets are not available. Analysis of the ACR Part VII forest project listing applications, identical to those for CARB-CAR applications, verified that soil carbon was not included in the carbon pools employed in net forest carbon estimations. The ACR sites with confirmed exclusion of soil carbon include ACR projects (n=30): 189, 173, 192, 199, 202, 211, 298, 249, 200, 256, 265, 266, 267, 268, 262, 265,255, 276, 282, 282, 273, 274, 284, 288, 292, 303, 324, 360, 277, 278. Based on the information available, ACR and VCS results were not considered in this study. According to analysis of carbon pool accounting summarized in Supplement 2, the ACR and VCS share protocols, terms and equations with the CARB-CAR and are expected to show similar results as for the CARB-CAR data. All data were transformed from tons carbon dioxide equivalent into units of grams carbon per meter squared per year (Cg m<sup>-</sup> <sup>2</sup>yr<sup>-1</sup>) unless otherwise noted. Annual records are employed across all sites as reported in respective data sources. All sites are located on an interactive map included as Supplement 1 and described in detail below. Our premise in this analysis is that the indirect estimation method for forest carbon employed by CARB-CAR projects (i.e., no direct measurement of CO<sub>2</sub>) can be compared to direct measurement methods for net CO<sub>2</sub> uptake or net ecosystem exchange (e.g., NEE) by forests considering each data set as independent populations. The two methods and their respective populations should show similar results (e.g., mean, SD) for net forest carbon sequestration across similar forest functional types defining the null hypothesis. The two populations are compared using statistical analysis methods as described below. The details of forest growth simulation models and related protocols employed by each of the CARB-CAR projects are described below. A summary of the underlying quantification equations employed by the CARB-CAR and related protocol is provided in Supplement 2.



**CARB-CAR Data Sources**. The CARB-CAR population data represent 63 sites covering 718 340 site years (Table 1, Supplement 1, 3), primarily located in the US. The CARB-CAR 719 720 projects listed in Table 1 were extracted from the California Air Resources Board and the California Environmental Protection Agency website pages as noted for "Early Action 721 Projects"<sup>164</sup> and as ARB Offset Credits Issued<sup>52</sup>. The 63 projects represent all available 722 723 CAR projects as of 09-01-2018 as recorded by the CARB<sup>52</sup> and range in size from ~200 to 724 250,000 acres providing from 1 to 14 years of GHG reduction data. The CARB-CAR results for forest carbon represent underlying methodologies reported by the CARB<sup>54,55</sup> 725 and CAR<sup>50,165</sup>. The CAR is authorized to provide its services under the CARB Cap-and-726 727 Trade Program's Compliance Offset Protocols. CAR services include listing projects and 728 issuing Registry Offset Credits that may later be submitted to CARB for final evaluation 729 and issuance of CARB Offset Credits. CAR forest carbon protocols were employed for the CARB Early Action Offset Program by issuing offset credits that qualified for 730 731 transition to the CARB offset credit system under the CARB-approved voluntary offset 732 protocols including the CAR Forest Project Protocol Versions 2.1 and 3.0 through 3.3<sup>166</sup>. 733 The CARB-CAR underlying equations are identical with respect to carbon pool terms and calculation of net GHG emissions reduction (Supplement 2), however, terminology 734 735 differs in some cases<sup>167</sup>. The project types with records from 1 to 15 years include avoided conversion (AC), conservation-based forest management (CFM) and improved 736 forest management (IFM) projects (Table I). Descriptive reports and cumulative 737 emissions data are derived from the CAR website homepage<sup>168</sup>. Forest project data were 738 accessed through links to a Climate Action Reserve project identification number 739 (CAR#) providing a project summary page, a document summary page and a 740 cumulative performance report page listing nine columns as follows: 1) Vintage, 2) 741 742 Reporting Period Start, 3) Reporting Period End, 4) Reporting Year, 5) Verified Gross GHG reductions and GHG removal enhancements for reporting period, 6) Verified 743 cumulative GHG reductions and GHG removal enhancements for reporting period, 7) 744 745 Negative Carryover from Prior Reporting Period, 8) Verified GHG reductions and GHG removal enhancements for reporting period, 9) Buffer Pool Contribution (%) and Total 746 Quantity of Offset Credits to Buffer Pool<sup>52</sup>. These headings differed for early CARB-CAR 747 748 projects including CAR 101 (Van Eck), CAR 102 (Garcia River), CAR 408 (Big River) and, 749 CAR 429 (McCloud River) (Table I, Footnote 1). In these cases, Project Activity (Tons) 750 and Baseline values for annual increments in the Cumulative Performance Reports page 751 were provided for each project. The data used in this analysis was extracted from the 752 Cumulative Performance Report page and from the column of Verified GHG Reductions for each year of each project or as otherwise reported on the project page 753 754 when a Cumulative Performance Report was not available (Table I). Serial numbers for 755 the CARB carbon credit offsets are provided in the documents cited (Table I). Project reporting is accompanied by the disclaimer: NEITHER APX NOR THE CLIMATE 756 757 ACTION RESERVE KNOWS OR ENDORSES THE CREDITWORTHINESS OR

758 REPUTATION OF ANY CLIMATE ACTION RESERVE ACCOUNT HOLDER LISTED IN
759 THIS DIRECTORY. Summary data for each of the projects reviewed are extracted from
760 the CAR webpages as described above, however it is not possible to cite documents
761 within the summary page; references to document titles are provided when cited in the
762 text. Latitudes and longitudes for each project are also provided in Table I. Annual
763 values for net sequestered carbon employed for the CARB-CAR data analysis are
764 available in Supplement 4.

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**CARB Protocols**. The CARB protocols cited are described in three related primary documents published in 2011<sup>54</sup>, 2014<sup>54</sup> and 2015<sup>55</sup> entitled: "Compliance Offset Protocol U.S. Forest Projects." Each of cited protocols identify field methods employing forest mensuration surveys, model simulation requirements and primary sources, sinks and reservoirs in a series of tables for Reforestation Projects (RF), Improved Forest Management Projects (IFM) and Avoided Conversion Projects (AC). In summary, a project is initiated using CARB or CAR application forms, a biometric timber survey is undertaken, and subsequently the data combined with forest vegetation proxies and simulation models are used to derive the magnitude of net GHG reductions for the project in the future (e.g., 100-year requirement) and/or the past<sup>50</sup>. The CARB-CAR forest carbon protocols share common features of estimation for net GHG reductions and removals including forest growth simulation models. For example, the Forest Vegetation Simulator (FVS) and related vegetation proxies for forest project species are employed in the CARB-CAR protocols. FVS data are coupled with identical numerical equations and carbon pool terms for net forest carbon sequestration directly linking the CARB and CAR protocols<sup>54,55,57,58</sup> (Supplement 2). Within each project type soil carbon is identified as a reservoir/pool as item 6 listed as RF-6, IFM-6 and AC-6. The soil carbon information applicable to the protocols are listed in Tables 5.1 (RF-6), 5.2 (IFM-6) and 5.3 (AC-6) for the protocols published in 2011<sup>54</sup> and 2014<sup>54</sup>, respectively. The same information is listed in Tables 4.1 (RF-6), 4.2 (IFM-6) and 4.3 (AC-6) in 2015<sup>55</sup>. Reference to inclusion or exclusion of the soil reservoir for each project listed in Table I is indicated and linked to one of the above protocols as cited in the summary documents provided for each project. Climate Action Reserve protocols<sup>58,166</sup> are considered equivalent to CARB protocols in this report as they are the basis for CARB registration of issued forest carbon offset credits. The underlying models and their specific application to the CARB project location are detailed in documents associated with each of the CARB projects as listed on each CAR project page. Table I provides features of the CARB-CAR data sets that appear to be anomalous or are applied inconsistently across the CARB-CAR project sites. CARB-CAR cites seven approved forest growth and yield models<sup>169</sup>; shared standards and references are lacking. Details of the ARB Compliance Offset Program and offset credits issued are provided by the CARB website<sup>170</sup>. All approved verification protocols must adhere to

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797 CARB standards<sup>171</sup>. The CAR designation for carbon pools are synonymous with those 798 for the ARB protocols; both exclude or otherwise exempt soil carbon as being static or not 799 subject to significant soil disturbance<sup>55,58</sup>. The CARB-CAR methods assume spatial 800 coverage across the full extent of the project area by placement of representative timber 801 survey plots, in contrast to smaller forest areas represented by eddy covariance flux 802 towers as discussed below (NEE Protocols).

**Forest Mensuration.** Forest mensuration, or biometric methodology, is intrinsic to the CARB-CAR protocol process and outcomes and are briefly reviewed here. Timber surveys, designed for timber operations, are required every six years or longer<sup>54,55</sup>, however, simulation models estimate annual incremental change for CARB-CAR net forest carbon sequestration absent annual surveys. CARB-CAR Forest mensuration methods rely primarily on measurement of tree diameter at breast height (DBH)<sup>172</sup>. The limitation of the biometric approach is that biomass is not directly measured as it is not quantified by harvest and weight of the carbon pools; this approach is not practical or economically feasible resulting in destruction of the forest. Uncertainties of 50% – 80% for individual trees and 20+ % for plot level estimation persist for forest mensuration<sup>172</sup>. Timber survey errors include: 1) variation in the parameters of allometric equation(s) and natural variability of tree structures, 2) measurement errors (DBH, tree height) and differences in frequency of measurement (e.g., multiple measurements per year), and, 3) selection of tree-specific parameters within allometric equations such as wood density. The uncertainties are compounded when the forest areas have been or are subject to management including timber extraction, thinning and prescribed fire. In many cases diverse sources of uncertainty are not identified, or new sources of uncertainty are introduced due to bias in data collection, limited coverage of representative forest areas, exclusion of selected carbon pools and inconsistent application of standards and calibration of equipment between measurements. An example of a comprehensive forest mensuration protocol is found in Barford et al. (e.g., weekly measurement of DBH during the growing season, biomass calculation using density data from a study of northern hardwood forests similar in latitude and elevation, weekly collection of leaf litter during the fall months sorted by genus, dried and weighed)<sup>173</sup>. Direct measurement of CO<sub>2</sub> ecosystem and soil respiration cannot be estimated from forest mensuration methods. Examples of forest mensuration including soil CO<sub>2</sub> efflux in relation to eddy covariance approaches are well represented <sup>69,174,175</sup>.

**NEE Data Source**. The NEE population data, referred to as NEE1, represent 59 sites covering 540 site years ranging from 5 to 18 years of annual data; gross primary production and ecosystem respiration are also reported<sup>65</sup>. NEE1<sup>65</sup> data have been checked for quality, analyzed statistically, and referenced, presenting the best available source of annual data for comparison with the CARB-CAR data. We did not consider

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aspects of NEE time series in this report. The NEE1 study reported a mean and standard deviation of approximately  $-200.00 \pm 162$  gCm<sup>-2</sup> yr<sup>-1</sup> 65, compared to a mean of -198.0and standard deviation of 261.6 gCm<sup>-2</sup> yr<sup>-1</sup> calculated in this study. The difference in mean and standard deviation result from different approaches to calculation. We calculated the sample mean and sample standard deviation of the pooled annual data of 544 points (Supplement 4). The authors of the NEE1 data calculate the mean by first obtaining the 59 means corresponding to the 59 different locations, and then calculating the mean of means<sup>65</sup>. The NEE1 standard deviation is also based on the deviations of each data point from the corresponding location mean (as opposed to the global mean). The difference in mean and standard deviation noted do not change the conclusions of the summary study<sup>65</sup> or our use that data. The NEE1 population includes 19 countries and forest projects, in part, overlapping with the CARB-CAR US dataset including temperate evergreen and deciduous forests, boreal forests and mixed forests. The NEE1 project data as reported in each of the NEE1 site references<sup>65</sup>, was utilized for this comparison based on independent data analysis and statistical results for the population of sites reported including data for annual net ecosystem exchange (NEE), ecosystem respiration (Reco) and gross primary productivity (GPP). Additional data for the Howland Forest (CARB-CAR671, NEE1-Ho1) covering the years 2008 to 2013 that were not included in the NEE1 dataset were obtained from an additional publication 108; these values were not included in summary statistics reported. We note that although 544 site years was reported<sup>65</sup>, four of those site years were absent data; we use the available 540 site year values and identify the four years of missing data in Supplement 4; references for extracted annual data are presented in NEE165. Individual annual data were not extracted from available flux data due to restrictions on public release<sup>86</sup>.

NEE Protocols. Measurement of net ecosystem exchange (NEE) is based on well-developed methods employing eddy covariance (EC). The EC method measures gas fluxes in and out of an ecosystem integrating all carbon pools in the above and below ground ecosystem compartments<sup>129,174</sup>. The EC method is the most accurate and direct approach available for determining the dynamic net ecosystem exchange (NEE) for a project area. NEE as used here is most simply described as the annual difference between CO<sub>2</sub> assimilation by photosynthesis (Gross Primary Productivity or GPP) and ecosystem respiration (soil and above ground respiration or Reco) where NEE = GPP + Reco<sup>69</sup>. In this report, separation of autotrophic and heterotrophic soil respiration and above ground plant respiration is not required for comparative analysis using NEE1 data. We emphasize soil CO<sub>2</sub> efflux as the dominant component of ecosystem respiration<sup>87,88,176</sup> and a key term in determination of net forest carbon balance. A negative NEE corresponds to a positive (net) sink of CO<sub>2</sub> or a positive (net) uptake of CO<sub>2</sub> by the biosphere, unless otherwise noted. The method is based on direct and fast measurements (e.g., 10 Hz) of actual gas transport characterized by a three-dimensional

wind field in real time. In this study, we did not control for tower height or upscaling 874 results across the diverse site locations. The concentration of the gas of interest (e.g., 875 CO<sub>2</sub>, <sup>13</sup>CO<sub>2</sub> and <sup>14</sup>CO<sub>2</sub>) is measured concomitantly resulting in flux of the gas. Flux data 876 are first converted to half-hourly mean grams of carbon per square meter (gC m<sup>-2</sup>s<sup>-1</sup>) 877 and then summed for each year as the cumulative annual net carbon exchange (gC 878 879 m<sup>-2</sup>yr<sup>-1</sup>). Tower based estimates of net ecosystem exchange are reported in negative units reflecting a micrometeorological sign convention where flux from the atmosphere 880 is negative, unless otherwise noted. The EC method has been applied worldwide under 881 882 remote and harsh conditions employing solar power often for months without maintenance <sup>129</sup>. Open or closed path gas analyzers (e.g., CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O) coupled with 883 automated flux calculation, telemetry and integrated micrometeorological sensors, for 884 885 example, are typical and deployed across numerous field platforms readily delivered to the project site. EC data are analyzed by a variety of models across small and large scales 886 to calculate NEE<sup>129</sup>. The spatial footprint of the NEE observation scales with height of 887 sampling inlet above the canopy, representing from ~0.1 km<sup>2</sup> to ~10 km<sup>2</sup> <sup>41</sup> for typical 888 single EC platforms. Upscaling of EC data provides up 100 km<sup>2</sup> of carbon sequestration 889 data<sup>23,178–180</sup>. Annual errors in NEE typically range between 30 and 100 gC m<sup>-2</sup> yr<sup>-1</sup> 890 <sup>100,181,182</sup>. Commercially available bulk and isotopic analyzers for EC measurements are 891 892 available from a variety of vendors (e.g., Los Gatos Research, San Jose, CA, USA).

- 894 Acknowledgements. The references cited in this study used eddy covariance data
- 895 acquired and shared by the FLUXNET community, including potentially these
- 896 networks: AmeriFlux, AfriFlux, AsiaFlux, CarboAfrica, CarboEurope-IP, CarboItaly,
- 897 CarboMont, ChinaFlux, FLUXNET Canada, Green- Grass, ICOS, KoFlux, LBA, NECC,
- 898 TERN OzFlux, TCOS-Siberia, and USCCC. Detailed data (e.g., annual records) cannot
- 899 be shared publicly because of Fluxnet2015 (https:// fluxnet.fluxdata.org/data/data-
- 900 policy/) and Lathuile (https://fluxnet.fluxdata.org/data/la-thuile-dataset/) data policies.
- 901 Annual values used in this study were acquired from individual references cited in
- 902 NEE1<sup>183</sup>.
- 903 Statistical Methods. Individual annual records were used in this analysis; trends in
- time series are not considered. Figure 1. The CARB-CAR dataset consists of 340 sample
- 905 points spanning the years 2001-2014. The NEE1 dataset consists of 540 sample points
- spanning over the years 1992-2015.
- 907 The skewness and kurtosis of the CARB-ARB and NEE1 datasets are -3.69 and 17.67,
- 908 respectively. As a comparison, the skewness and kurtosis for the NEE1 dataset are 0.25
- 909 and 2.31.
- 910 The skewness is calculated in the following way:

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$$\frac{n\sum_{i=1}^{n}(x_{i}-\overline{x})^{3}}{(n-1)(n-2)s^{3}}$$

- where  $\bar{x}$  and s are the sample mean and sample standard deviation of the CARB-CAR
- 913 data, and n=340.
- The skewness is negative, which means that the distribution is skewed to the left.

916 The kurtosis is calculated in the following way:

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$$\frac{n(n+1)\sum_{i=1}^{n}(x_{i}-\overline{x})^{4}}{(n-1)(n-2)(n-3)s^{4}} - \frac{3(n-1)^{2}}{(n-2)(n-3)}$$

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- where  $\bar{x}$  and s are the sample mean and sample standard deviation of the CARB-CAR
- data, and n=340. It provides a measurement of the extremities of the data. A kurtosis
- value of 17.67 demonstrates the presence of very large outliers.

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- 923 Figure 3. We calculate the 95% confidence interval for the difference in means of the two
- 924 data sets CARB-CAR and NEE1.
- The first bar is based on the complete data sets over all available years. We use the
- 926 following formula for large sample size:

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$$(\overline{x_1} - \overline{x_2}) \pm 1.96 \sqrt{\frac{s_1^2}{n_1} + \frac{s_2^2}{n_2}}$$

- where  $\overline{x_1}$  and  $\overline{x_2}$  are the sample means, and  $s_1$  and  $s_2$  are the sample standard deviations
- 931 of the two samples.



For the year 2007, we have 23 CARB-CAR and 42 NEE1 data points. For the year 2008, 932 933

we have 24 CARB-CAR and 41 NEE1 data points. In order to calculate the confidence

interval, we use the following formula for a small sample size: 934

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$$(\overline{x}_1 - \overline{x}_2) \pm t \sqrt{s_p^2 \left(\frac{1}{n_1} + \frac{1}{n_2}\right)}$$

where 937

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$$s_p^2 = \frac{(n_1 - 1)s_1^2 + (n_2 - 1)s_2^2}{n_1 + n_2 - 2}$$

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and t is based on  $(n_1 + n_2 - 2)$  degrees of freedom. 940

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Table II. Table 1 shows the results of multiple one-sided hypothesis tests, ranging from 942

2002 to 2014. For each year, we test the following hypotheses: 943

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$$H_0: \mu_1 - \mu_2 \le D$$

945 
$$H_a$$
:  $\mu_1 - \mu_2 > D$ 

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where  $\mu_1$  and  $\mu_2$  are the true population means and D is the allowed 5% threshold.

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Since the CARB-CAR sample sizes vary from 2 to 32 per year, we use a small-sample

one-sided hypothesis test. The test statistic is the following: 950

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$$t = \frac{(\bar{x}_1 - \bar{x}_2) - D}{\sqrt{s_p^2} \sqrt{\left(\frac{1}{n_1} + \frac{1}{n_2}\right)}}$$

953 where  $s_n^2$  was already defined in the description of figure 3 methodology, and t is based 954 on  $(n_1 + n_2 - 2)$  degrees of freedom. 955 956 **Data Availability.** All data is provided in Supplementary Information. 957 **Author Contributions:** B.D.V.M. conceived the research, developed and wrote the 958 959 manuscript; M.M. performed the statistical analysis; A.D. constructed the interactive 960 map. 961 **Funding:** This research received no external funding. **Conflicts of Interest:** The authors declare no conflict of interest. 962 963 References 964 1. Warren-Thomas, E. M. *et al.* Protecting tropical forests from the rapid expansion 965 of rubber using carbon payments. Nat. Commun. 9, 911 (2018). 966 2. Osborne, T. & Shapiro-Garza, E. Embedding Carbon Markets: Complicating 967 Commodification of Ecosystem Services in Mexico's Forests. Ann. Am. Assoc. 968 Geogr. 108, 88–105 (2018). 969 970 3. Rogelj, J. et al. Scenarios towards limiting global mean temperature increase below 1.5 °C. Nat. Clim. Chang. 8, 325–332 (2018). 971 Mengis, N., Partanen, A. I., Jalbert, J. & Matthews, H. D. 1.5 °c carbon budget 972 4. dependent on carbon cycle uncertainty and future non-CO2 forcing. Sci. Rep. 973 (2018). doi:10.1038/s41598-018-24241-1 974 5. IPCC. Global Warming of 1.5°C: An IPCC special report on the impacts of global 975 warming of 1.5 °C above pre-industrial levels and related global greenhouse gas 976 977 emission pathways, in the context of strengthening the global response to the threat of climate change. (2018). Available at: https://www.ipcc.ch/report/sr15/. 978 979 Sandor, R. L., Walsh, M. J. & Marques, R. L. Greenhouse-gas-trading markets. 6. 980 Capturing Carbon Conserv. Biodivers. Mark. Approach 346–357 (2013). doi:10.4324/9781849770682 981



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The project location map, Figure 1, is an interactive map displaying the locations of 59 NEE1 sites<sup>65</sup> and 63 CARB-CAR project sites (see Methods section for details). Information for each site, including the underlying biome and land cover classification is provided, allowing users to compare the underlying ecological properties for a given project site with other sites. Each project site point was geocoded or otherwise plotted in WGS84 coordinate system using the best available latitude and longitude information for each location. Blue circles represent NEE1 sites while pink circles represent CARB-CAR projects. All sites on the map feature a unique site identifier code (e.g., CAR697) which is linked to project data in Table 1 and summarized in Table I, Supplement 3. A link to the project web page for each site is included in the pop-up display. CARB-CAR and NEE1 sites were classified for functional type based on the 2015 CCI-LC dataset. This Land Cover product was developed by the European Space Agency Climate Change Initiative (ESA CCI Land Cover project). The land cover overlay represents a 300-meter resolution global land cover classification and is compatible with the plant functional types used in many global land cover models. Land cover data source and additional information: https://www.esa-landcover-cci.org. The base map provided is Satellite Streets by Mapbox (https://www.mapbox.com).

**Supplement 2: The CARB and CAR Quantification Methodology.** The equations for carbon material balance as defined by the CARB protocols<sup>54,55</sup> are analyzed considering the simple case for a one-year project. The equations identify the exclusion of soil carbon pools in the CARB-CAR and related forest carbon protocols. The net GHG reductions and GHG removal enhancements are provided by the common quantification equation provided by CARB-CAR (CARB 2011, p. 37, Equation 6.1<sup>54</sup>; CARB 2014, p. 39, Equation 6.1<sup>54</sup>; CARB 2015, p. 47, Equation 5.1; CAR, Equation 61., p. 46<sup>55</sup>). In summary,

1501  $QR_{y} = \left[ \left( \Delta C_{onsite} - \Delta BC_{onsite} \right) + \left( AC_{wp, y} - BC_{wp, y} \right) \times 80\% + SE_{y} \right] \times (1 - ACD) + CCD + C$ 1502 (1) 1503  $N_{v-1}$ Equation (1) can be rewritten for clarity with each grouped expression or factor given a 1504 subscript for discussion purposes written as (for the definition of each term above see<sup>55</sup>), 1505 1506  $QR_v = [(actual\ onsite\ carbon - baseline\ onsite\ carbon)_1$ 1507 + (actual onsite wood products – baseline onsite wood products)<sub>2</sub> ×  $(80\%)_3$ 1508 +  $(secondary\ emissions)_4$  \times  $(avoided\ conversion\ factor)_5$  +  $(negative\ carry\ over)_6$ 1509 1510 1511 (2) 1512 Expression (2) can be simplified considering the case of a single year as, 1513  $QR_{y} = \left[ \left( \Delta C_{onsite} - \Delta B C_{onsite} \right)_{1} + \left( 0_{wp, y} - 0_{wp, y} \right)_{2} \times 0\%_{3} + 0_{y4} \right] \times (1 - 0)_{5} + 0_{6},$ 1514 1515 1516 (3)1517 and by considering term 2, "wood products", as zero product in this case. Zero wood product eliminates terms 3 and 4. Term 5 is set at zero reflecting no project conversion 1518 in this case. Expression 6, carryover of GHG reductions from a previous year, is set at 1519 1520 zero considering this year as a one-year project for the purposes of illustration. The simplifications noted can be expressed as, 1521 1522  $QR_v = (actual \ onsite \ carbon - actual \ baseline \ carbon).$  (4) 1523 1524 1525 The terms for actual onsite carbon and actual baseline carbon are defined as follows: 1526  $AC_{onsite, y}$  = Actual onsite carbon (CO<sub>2</sub>e) as inventoried for year y, and, 1527 1528 (5) 1529  $BC_{onsite.v}$  = Baseline onsite carbon (CO<sub>2</sub>e) as estimated for year y. 1530 1531 (6) Both "actual onsite" and "baseline onsite" carbon terms require an inventory of 1532 required carbon pools as identified in tables for reforestation (Table 4.155), improved 1533 forest management (Table 4.255) and for avoided conversion (Table 4.355) and 1534 counterfactual arguments to establish baselines. The carbon inventory tables identify the 1535 following carbon pools: 1) standing live tree carbon, 2) shrubs and herbaceous 1536

understory carbon, 3) standing dead tree carbon, 4) lying dead tree carbon, 5) litter and 1537 duff carbon, 6) soil carbon, 7) carbon in in-use forest products, 8) forest product carbon 1538 1539 in landfills, 9) biological emissions from site preparation activities, 10) mobile combustion emissions from site preparation activities, 11) mobile combustion activities 1540 1541 from ongoing project operation and maintenance, 12) stationary combustion emissions 1542 from ongoing project operation and maintenance, and, 13) biological emissions from 1543 clearing of forestland outside of the project area. Each of the above pools is labeled as RF for reforestation, IFM for improved forest management and AC for avoided 1544 1545 conversion within each table. Specifically, the soil carbon pool for each project type is labeled as RF-6, IFM-6 and AC-6. In the case for each project type, the pools for RF-6, 1546 1547 IFM-6 and AC-6 are noted as "included/excluded" according to project activities such as deep ripping or furrowing and mechanical site preparation not conducted on 1548 contours<sup>55</sup>. Additionally, no crediting is allowed for increased soil carbon<sup>55</sup>. Thus, in 1549 1550 cases where soil carbon is excluded, such as for the projects analyzed in this report and 1551 listed in Table I, we can rewrite (4) for clarity as,

 $QR_y =$ (actual onsite carbon <sub>excluding soil carbon</sub> – actual baseline carbon <sub>excluding soil carbon</sub>)
. (7)

Equation (7) can be rewritten as,

 $QR_y =$ (actual onsite above ground carbon – actual above ground baseline carbon).
(8)

In summary, the CARB equations, in practice as reported here, exclude terms for soil carbon in carbon pool accounting. Identical equations are employed for the CAR projects<sup>167</sup>.

Next, we consider similarities between the CARB-CAR equations and the ACR, CDM and VCS protocols. The American Carbon Registry identifies an analogous equation for net anthropogenic GHG removals by equation 44 of the ACR methodology<sup>61</sup>:

1571  $C_{AR-AC} = \Delta C_{Actual} - \Delta C_{BSL} - LK,$ 1572 (9)
1573

1574 Where:

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C_{AR-AC} = Net anthropogenic GHG removals by sinks; MT CO<sub>2</sub>e,
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                (10)
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         \Delta C_{Actual} = Actual net GHG removals by sinks; MT CO<sub>2</sub>e,
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                (11)
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1581
         \Delta C_{BSL} = Baseline net GHG removals by sinks; MT CO<sub>2</sub>e, and,
1582
                (12)
1583
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         LK = Total GHG emissions dues to leakage: MT CO<sub>2</sub>e.
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                (13)
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         No terms for direct measurement of CO<sub>2</sub> are identified. Soil carbon is identified as an
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         optional carbon pool.
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         The Clean Development Mechanism, AR-ACM0003 A/R, for large-scale consolidated
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         methodology for afforestation and reforestation of lands except wetlands, Version 02.0
         Sectoral scope(s)<sup>184</sup>: 14, states:
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         \Delta C_{AR-CDN,t} = \Delta C_{ACTUAL,t} - \Delta C_{BSL,t} - LK_{t'}
1595
1596
                (14)
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         Where,
         C_{AR-CDM,t} = Net anthropogenic GHG removals by sinks, in year t; t CO<sub>2</sub>-e,
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1600
                (15)
1601
         \Delta C_{ACTUAL,t} = Actual net GHG removals by sinks, in year t; t CO<sub>2</sub>-e,
1602
1603
                (16)
1604
         \Delta C_{RSL,t} = Baseline net GHG removals by sinks, in year t, t CO<sub>2</sub>-e, and,
1605
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                (17)
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         LK_t = GHG emissions due to leakage, in year t, t CO<sub>2</sub>-e.
1608
1609
                (18)
1610
         No terms for direct measurement of CO<sub>2</sub> are identified. Soil carbon is identified as an
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         optional carbon pool.
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The Verified Carbon Standard describes the Methodology for Carbon Accounting for 1614 Mosaic and Landscape-scale REDD Projects, VM0006<sup>117</sup>, for quantifying emission 1615 reductions and/or removals from activities to reduce unplanned deforestation and forest 1616 degradation of the mosaic configuration. The methodology is chosen for comparison to 1617 1618 the CAR, ACR and CDM protocols as it can be combined with Improved Forest 1619 Management (IFM) and Afforestation, Reforestation and Revegetation (ARR) 1620 methodologies to implement a landscape scale Reduced Emissions from Deforestation and Forest Degradation (REDD+) projects. The net anthropogenic GHG removal is 1621 1622 summarized as follows: 1623 (19)1624  $C_{ANR}(t) = \Delta C_{ANR}(t) - \Delta C_{ANRRSL}(t)$ 1625 1626 Where:  $C_{ANR}(t)$  = Net anthropogenic greenhouse gas removals due to biomass increase in 1627 assisted natural regeneration during year t [tCO<sub>2</sub>e], 1628 1629 (20)1630 1631  $\Delta C_{ANR}(t)$  = Annual change in carbon stocks in all selected carbon pools due to ANR during year t [tCO<sub>2</sub>e], 1632 1633 (21)1634  $\Delta C_{ANR,BSL}(t)$  = Baseline GHG gas emissions or sources during year t [tCO<sub>2</sub>e]. 1635 1636 (22)1637 1638 No terms for direct measurement of CO<sub>2</sub> are identified. Soil carbon is identified as an optional carbon pool. 1639 1640 In each case for the ACR, CDM and VCS, similar above ground and baseline terms are 1641 employed reflecting the simplified equation (7) noted above for the CARB-CAR 1642 protocols. No terms for direct measurement of CO<sub>2</sub>, soil carbon or soil CO<sub>2</sub> efflux are 1643 employed in the protocol equations cited. 1644 Supplement 3: Table 1, CARB-CAR Project and Location Data (File Attached) 1645 Supplement 3: Table 2, NEE1 Project and Location Data (File Attached) 1646 Supplement 4: Table 1. Annual Data records CARB-CAR (File Attached)

Supplement 4: Table 2. Annual data records NEE1 (File Attached)



#### 1649 Supplement 5: Summary data CARB-CAR, NEE1 (File Attached)

 $^{\rm i}$  The concentration of CO<sub>2</sub> that would cause the same amount of radiative forcing as a given mixture of CO<sub>2</sub> and other greenhouse gases.

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$$percentaage\ error = \frac{|\mathit{CARB}\ \mathit{CAR}\ \mathit{value}\ - \mathit{NEE1}\ \mathit{value}|}{\mathit{CARB}\ \mathit{CAR}\ \mathit{value}} \ x\ 100$$

<sup>&</sup>lt;sup>iii</sup> The term isotopologue refers to chemical species that differ only in the isotopic composition of their molecules or ions.



#### Table 1(on next page)

CARB-CAR site locations, links to online data source and anomalous features

CARB-CAR site locations, links to online data source and anomalous features

	Climat e Action Reserv e #	Successo r Climate Action Reserve	AR B Proj ect ID#	Project Name & Location	Lo ng itu de	La tit u de	Functional Type	Ty pe of Pro toc ol	A cr es **	He cta res	Proje ct Inter val (Vint age Years	Projec t Mana geme nt	Offsets Issued with Serial Numbers	Cumulative Performance Report	Anomalo us Features*	Soil Carbon Status
1	<u>CAR1</u> <u>01</u>	NA	CA FR0 049	The Van Eck Forest (Humboldt County, CA)	12 4.0 8	40 .8 7	Northern California Coast (Coast Redwood/Doug las Fir Mixed Conifer) & Southern Cascades (Southern Cascade Mixed Conifer)	Ear ly Act ion	2, 10 4	85 1	2001- 2014	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=101&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20101	^^ (2008) to 2001; ## (2008) to 2014	%%Reporting Year 2006, Soil Carbon Pool tCO2e = 0
2	CAR1 02	CAR109 8	CA FR0 040	Garcia River Forest (Mendocin o, CA)	- 12 3.5 1	38 .9 1	Temperate coniferous	Ear ly Act ion	23 ,7 80	9,6 23	2005- 2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=102&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20102	^^(2007)2 007-2004; ##(2007) 2008-2014	%%Reporting Year 2010, Soil Carbon Pool Excluded from carbon pool calculations
3	<u>CAR4</u> <u>08</u>	CAR110 0	CA FR0 041	Big River / Salmon Creek Forests (Mendocin o, CA)	- 12 3.6 7	39 .3 01	Temperate coniferous	Ear ly Act ion	15 ,9 11	6,4 39	2007- 2017	IFM	https://thereserve2.apx.com/myModule/r pt/myrpt.asp?r=802&md=Prpt&id1=%204 08	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20408	##(2007) 2007- 2014; \$2012	%%2007 Project Submittal Form, Soil Carbon Excluded
4	<u>CAR4</u> 29	NA	CA FR0 073	McCloud River (McCloud, CA)	- 12 2	41 .2	Temperate broadleaf and mixed	Ear ly Act ion	9, 20 0	3,7 23	2006- 2014	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=429&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20429	## (2006) 2006 to 2014	%%2009 Project Submittal Form, Soil Carbon N/A
5	<u>CAR4</u> <u>30</u>	NA	NA	RPH Ranch (Comptche , Mendocino County, CA)	12 3.5 9	39 .2 6	Temperate coniferous	Ear ly Act ion	10 6	43	2010	IFM	https://thereserve2.apx.com/mymodule/r eg/TabDocuments.asp?r=111&ad=Prpt&a ct=update&type=PRO&aProj=pub&table name=doc&id1=430	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20430	##(2002) 2002 to 2010; \$\$(00.00) 2002 to 2009	%%2008 Project Submittal Form, Soil Carbon N/A
6	<u>CAR4</u> 97	NA	CA FR0 029	Blue Source – Alligator River (Hyde County, NC)	76. 03 1	35 .6 31	Northern Atlantic Coastal Swamp Hardwoods, Cypress	Ear ly Act ion	2, 27 2	91 9	2010- 2017	AC	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=497&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20497	\$(2011)	%%Project Design Document, Section 15. Carbon Stock Inventory, Soil Carbon Excluded
7	CAR5	NA	NA	Arcata Sunnybrae	- 12	40 .8	Northern California Coast	No t	17	69	2006-	IFM	https://thereserve2.apx.com/mymodule/reg/TabProjectEmissions.asp?id1=575&ad	https://thereserve2.apx.co m/myModule/rpt/myrpt.	^^(2012) 2012 to	%%Project Design Document, 4. Onsite Carbon

	<u>75</u>			Tract (Humbodlt County, CA)	4.0 5	64	(Coast Redwood/Doug las Fir Mixed Conifer) & Southern Cascades (Southern Cascade Mixed Conifer)	Eli gib le	1		2015		=Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	asp?r=802&md=Prpt&id1 =%20575	2006; \$(2006) one month	Inventory Methodology
8	<u>CAR5</u> <u>82</u>	CAR113 0	CA FR0 103	Finite Carbon – MWF Brimstone IFM Project I (Scott County, TN)	- 84. 45 5	36 .2 72	Mixed Oak	Ear ly Act ion	48 61	1,9 67	2007- 2015	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=582&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20582	^^(2013) 2013 to 2007; \$(2007) ~3 months; \$(2013) ~ 8 months; \$(2015); %(2015)	%%Project Design Document, Item 23. Soil Carbon Pool Absent; Table 23, soil carbon absent, Table 10, soil carbon absent
9	<u>CAR5</u> 90	NA	NA	Lompico Forest Carbon Project (Santa Cruz County, CA)	12 2.0 4	37 .1 3	Temperate coniferous Temperate broadleaf, mixed Coastal Redwood forest	No t Eli gib le	42 5	17 2	2010- 2014	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=590&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20590	\$\$(1074.0 0) 2010 to 2012	%%Project Design Document, Section 3. Onsite Carbon Inventory Methodology, soil carbon excluded as an optional carbon pool.
1 0	<u>CAR6</u> 45	CAR108 8	CA FR0 080	Finite Carbon – The Forestland Group Champion Property (Franklin, St. Lawrence & Lewis Counties, NY)	-75	44 .3	Spruce-fir; Pine and hemlock; Northern hardwoods	Ear ly Act ion	10 0, 00 0	40, 46 9	2009- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=645&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20645	^^(2012) 2012 to 2009; \$(2009) -7 months; \$ (2014, 2015, 2016); \$(2014, 2015, 2016); \$(2016) 2015, 2016)	%%Project Design Document, Table 5. Sources, Sinks, and Reservoirs, IFM- 6, Soil Carbon excluded
1 1	<u>CAR6</u> 46	NA	NA	Katahdin Iron Works Ecological Reserve (Piscataqui s County, ME)	- 69. 17	45 .4 5	Evergreen Needleleaf Forest	No t Eli gib le	10 ,0 00	4,0 47	2007- 2012	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?r=111&ad=P rpt&act=update&type=PRO&aProj=pub& tablename=cr&id1=646	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20646	\$(2007) ~8 months; ^^(2013) 2013 to 2007	%%Project Design Document, Section 3. Inventory Methodology, IFM-4, Soil Carbon excluded
1 2	<u>CAR6</u> <u>48</u>	CAR108 6	CA FR0 047	Finite Carbon – Potlatch Moro Big Pine CE (Calhoun	92. 54	33 .5	Evergreen Needleleaf Forest	Ear ly Act ion	16 ,0 00	6,4 75	2006- 2014	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=648&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20648	\$(2006) ~1 month; ^^(2013) 2013 to 2006; \$(2013) ~7	%%Project t Design Document, Table 7. Sources, Sinks, and Reservoirs, IFM- 6, soil carbon excluded.

				County, AR)											months; % (2014) 2012, 2013, 2014; \$(2014) ~7 months	
1 3	<u>CAR6</u> 55	NA	CA FR0 105	Alder Stream Preserve (Piscataqui s County, ME)	69. 01 5	45 .1 14	Evergreen Needleleaf Forest	Ear ly Act ion	1, 46 0	59 1	2006- 2013	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=655&ad =Prpt&act=update&sBtn=&t=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20655	\$ initial year 1 month, 2006; ## 2012, 2014; ##2006 to 2013	%%Project Design Document, Section 3, Inventory Methodology, IFM-6, soil carbon excluded
1 4	<u>CAR6</u> <u>57</u>	CAR106 3	CA FR0 002	Finite Carbon Farm Cove Communit y Forest Project (Near Grand Lake Stream, Maine)	67. 85 1	45 .1 87	Evergreen Needleleaf Forest	Ear ly Act ion	19 ,7 69	8,0 00	2010- 2015	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=657&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20657	\$(2003) < 1 month; ^^(2012) 2011 to 2003	%%Project Design Document, Section A13. Carbon Pools,. IFM-6, soil carbon excluded
1 5	<u>CAR6</u> <u>58</u>	CAR113 4	CA FR0 087	Finite Carbon – Brosnan Forest (Near Charleston , SC)	80. 45	33 .1 67	Evergreen Needleleaf Forest	Ear ly Act ion	10 ,2 09	4,1 31	2010- 2011; 2015- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=658&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20658	#(2010) \$(2013) ~8 months; ^^(2013) 2011 to 2010	%%Project Design Document, Section A13. Carbon Pools,. IFM-6, soil carbon excluded
1 6	<u>CAR6</u> <u>59</u>	NA	CA FR0 026	Blue Source – Pungo River Forest Conservati on Project (Washingt on County, NC)	- 76. 64	35 .8 04	Atlantic Coastal Plain Swamp Hardwood and Cypress	Ear ly Act ion	70 4	28 5	2003- 2016	AC	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=659&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20659	\$(2003) < 1 month; ^^(2012) 2011 to 2003	%%Project Design Document, 11.2.3.4.1 Soil carbon was sampled to establish starting carbon stocks that would be degraded if the baseline scenario was followed, e.g. full conversion to agricultural use. The soil carbon was excluded as source of CO2 over the lifetime of the project (e.g., AC-6).
7	<u>CAR6</u> <u>60</u>	CAR109 9	CA FR0 042	Gualala River Forest (Southern Mendocino	12 3.4 02	38 .7 96	Coastal Redwood and Douglas Fir	Ear ly Act ion	13 ,9 13	5,6 30	2004- 2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=660&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20660	^^(2011) 2010 to 2004; %(2015) 2015,	%%Project Design Document, Section 7. Summary of the carbon stock inventory for the Forest Project by

				County, Near Gualala, CA)											2016; %(2017) 2016, 2017	each pool, soil carbon pool excluded
1 8	<u>CAR6</u> 61	CAR114 0	CA FR0 001	Willits Woods (Near Willitis, CA)	12 3.3 57	39 .4 11	Coastal Redwood and Douglas Fir	Ear ly Act ion	18 ,0 08	7,2 88	2004- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=661&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20661	^^(2011) 2010 to 2004	%%Project Design Document, Section 5. Calculation methodologies for determining metric tones per acre for each of the included carbon pools, soil carbon excluded
1 9	<u>CAR6</u> 72	NA	CA FR0 116	Hershey Mountain (North of Concord, NH)	- 71. 66 7	43 .5 67	Adirondacks & Green Mountains Northern Hardwood	Ear ly Act ion	2, 14 1	86 6	2007- 2013	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=672&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20672	#(2007); \$(2007) ~6 months; ^^(2014) 2013 to 2007	%%Project Design Document, Section A13. Carbon Pools, soil carbon FM-6 excluded
2 0	<u>CAR6</u> 76	NA	CA FR0 031	Pocosin Lakes Forest Conservati on Project (Tyrrell County, NC)	- 76. 20 9	35 .8 62	Atlantic Coastal Plain, Swamp Hardwood and Cypress	Ear ly Act ion	1, 34 9	54 6	2003-2012	AC	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=676&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20676	^^(2012) 2011 to 2003; \$(2003) ~2 months;	%%Project Design Document, 11.2.3.4.1 Soil carbon was sampled to establish starting carbon stocks that would be degraded if the baseline scenario was followed, e.g. full conversion to agricultural use. The soil carbon was excluded as source of CO2 over the lifetime of the project (e.g., AC-6
2 1	<u>CAR6</u> <u>81</u>	NA	CA FR0 106	Howland Research Forest (Howland, ME)	- 68. 62 7	45 .2 46	Red Spruce and Eastern Hemlock	Ear ly Act ion	55 2	22 3	2008- 2013	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=681&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20681	#(2008); \$(2008); ^^(2014) 2013 to 2008; %(2008) 2008, 2008	%%Project Design Document, Section 3 Inventory Methodology, IFM-6, soil carbon excluded
2 2	<u>CAR6</u> 83	NA	CA FR0 030	Francis Beidler Project (Berkeley, Dorchester and Orangebur g Counties, SC)	- 80. 35 8	33 .3 21	Native Hardwoods, Softwoods, Mixed Forest	Ear ly Act ion	5, 54 8	2,2 45	2007- 2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=683&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20683	#(2007) ~5 months; \$(2012); ^(2012) 2012 to 2007; ^(2015) 2015 to 2012; \$(2015); \$(2016); \$(2017)	%%Project Design Document, Section 3, Inventory Methodology, soil carbon excluded

2 3	<u>CAR6</u> <u>86</u>	CAR116 0	CA FR0 058	Virginia Conservati on Forestry Program – Clifton Farm (Near Rosedale, VA)	81. 86	37 .0 22	Mixed Pine Hardwood, Cove Forests, Oak - Hickory	Ear ly Act ion	4, 06 9	1,6 47	2004- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=686&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20686	^^(2012) 2011 to 20014; ^^(2014) 2013 to 2012); \$(2016) 2015,2016	%%Project Submittal Form, Item 10, soil carbon excluded
2 4	<u>CAR6</u> <u>88</u>	NA	CA FR0 028	Blue Source – Noles North Forest Project (Washingt on and Hyde Counties, NC)	- 76. 54 8	35 .8 81	Atlantic Coastal Plain, Swamp Hardwood and Cypress	Ear ly Act ion	28 1	11 4	2002- 2016	AC	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=688&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20688	\$(2002) -7 months; ^^(2012) 2011 to 2002; \$\$(6,099.0 0) 2003 to 2009; \$\$(5,830.0 0) 2013 to 2014	%%Project Design Document, 11.2.3.4.1 Soil carbon was sampled to establish starting carbon stocks that would be degraded if the baseline scenario was followed, e.g. full conversion to agricultural use. The soil carbon was excluded as source of CO2 over the lifetime of the project (e.g., AC-6)
2 5	<u>CAR6</u> 94	NA	NA	Lucchesi Tract (Humboldt County, CA)	- 12 4.0 64	40 .8 75	Temperate coniferous, Temperate rainforest;	No t Eli gib le	32 2	13 0	2010- 2016	IFM	https://thereserve2.apx.com/mymodule/reg/TabProjectEmissions.asp?id1=694&ad=Prpt&act=update&sBtn=&r=111&Type=PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20694	^^(2012) 2011 to 2001; \$\$(00.00)2 001 to 2009; \$\$(2,182.0 0) 2012 to 2016	%%Project Design Document, Section D. Step 4. Determine the baseline carbon stocks over 100 years for all required and optional carbon pools in the Project Area, soil carbon excluded
2 6	<u>CAR6</u> 96	CAR115 9	CA FR0 057	Rich Mountain (Russell & Washingto n Counties, NW of Saltville, VA)	82. 03	36 .8 31	Allegheny & North Cumberland Mountains - Mixed Pine Hardwood, Cove Forests, Northern Hardwoods, Oak - Hickory	Ear ly Act ion	5, 75 0	2,3 27	2002- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=696&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20696	\$(2002) -6 months; ^^(2012) 2011 to 2002; ^^(2015) 2014 to 2013; %(2016) 2015, 2016	%%Project Submittal Form, item 10. IFM-6, soil carbon excluded
2 7	<u>CAR6</u> <u>97</u>	CAR114 7	CA FR0 102	Tazewell – Elk Garden (Russell, Washingto n, and Tazewell Co. near Tazewell, VA)	- 81. 55 9	37 .1 24	Allegheny & North Cumberland Mountains - Mixed Pine Hardwood, Cove Forests, Northern Hardwoods, Oak - Hickory	Ear ly Act ion	11 ,6 97	4,7 34	2007- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=697&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20697	^^(2014)2 013 to 2005; %(2014) 2015, 2016; %(2016) 2015, 2016	%%Project Submittal Form, item 10. IFM-6, soil carbon excluded

8	<u>CAR7</u> <u>30</u>	CAR113 9	CA FR0 123	Usal Redwood Forest (Mendocin o County, CA)	12 3.8 47	39 .8 76	Coast Redwood/Doug las-fir Mixed Conifer	Ear ly Act ion	49 ,0 00	19, 83 0	2007- 2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=730&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20730	#(2007); \$(2207) ~6 months; ^^(2015) 2015 to 2007	%%Project Submittal Form, item 10. IFM-6, soil carbon excluded
2 9	<u>CAR7</u> 49	CAR110 9	CA FR0 063	Green Assets – Middleton (Charlesto n, SC)	80. 14 1	32 .9	SE Middle Mixed Forest Piedmont Atlantic Coastal Plain & Flatwoods	Ear ly Act ion	3, 73 2	1,5 10	2007- 2017	AC	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=749&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20749	\$(2007) < 1 month;     ^^(2013) 2011     to2007; \$(2011)20     13, 2014;     ^^(2014) 2013 to 2011;     %(2015) 2014, 2015;     %(2016) 2015, 2016;     %(2017) 2016, 2017	%%Project Design Document, Section 11.2.3 Data gathering procedures and parameters, AC-6, soil carbon excluded, Table 5, soil carbon emissions excluded
3 0	<u>CAR7</u> 77	NA	CA FR0 064	Yurok Tribe Sustainable Forest Project (Northwes t Humboldt County, CA)	- 12 3.8	41 .4 06	Northern California Coast (Coast Redwood/Doug las Fir Mixed Conifer) & Southern Cascades (Southern Cascade Mixed Conifer)	Ear ly Act ion	21 ,2 40	8,5 96	2011- 2014	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=777&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20777	#(2011) \$(2011) ~8 months; ^^(2014) 2013 to 2012	%%Project Desing Document, Section 3. Inventory Methodology, IFM-6, soil carbon excluded
3 1	<u>CAR7</u> <u>80</u>	CAR106 2	CA FR0 088	Shannonda le Tree Farm (Washingt on County, NC)	- 91. 45	37 .3 67	Atlantic Coastal Plain - Atlantic Coastal Plain Swamp Hardwood and Cypress	Ear ly Act ion	40 37	1,6 34	2010- 2013	AC	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=780&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20780	#(2013); \$(2013) ~4 months; ^^(2013) 2011 to 2010; ^^(2015) 2013 to 2012	%%Project Design Document, Section A13. Carbon Pools, IFM-6, soil carbon excluded
3 2	<u>CAR8</u> <u>02</u>	NA	CA FR0 027	Noles South Forest Project (Washingt on County, NC)	76. 54 8	35 .8 65	Atlantic Coastal Plain - Atlantic Coastal Plain Swamp Hardwood and Cypress	Ear ly Act ion	32 4	13 1	2003- 2016	AC	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=802&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20802	\$(2003) ~1 month; ^^(2012) 2011 to 2003; \$\$(5,180.0 0) 2005 to 2009; \$\$(5,830.0	%%Project Design Document, 11.2.3.4.1 Soil carbon was sampled to establish starting carbon stocks that would be degraded if the baseline scenario was followed, e.g. full conversion to

															0) 2011, 2012	agricultural use. The soil carbon was excluded as source of CO2 over the lifetime of the project (e.g., AC-6)
3 3	<u>CAR9</u> 35	NA	NA	Arcata City Barnum Tract (Arcata, CA)	12 4.0 49	40 .8 76	Northern California Coast Redwood/Doug las-fir Mixed Conifer	No t Eli gib le	28 0	11 3	2003- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=935&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%20935	\$(2003) ~11 months; ^^(2012) 2011 to 2003; \$\$(2,904.0 0) 2005 to 2011; \$\$(2,527.0 0) 2012 to 2016	%%Project Design Document, Section Step 4. Determine the baseline carbon stocks over 100 years for all required and optional carbon pools in the Project Area, IFM-6. soil carbon excluded
3 4	<u>CAR1</u> 013	NA	CA FR5 055	Buckeye Forest Project (Sonoma County, CA)	12 3.3 1	38 .7 4	Coast Redwood / Douglas-fir Mixed Conifer and Northern California Coast Mixed Oak Woodland	Co mp lia nce	19 ,5 25	7,9 01	2014- 2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1013&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2014); \$%(2014); \$%(2015); \$%(2016); \$%(2017);	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, Not applicable
3 5	<u>CAR1</u> 015	NA	CA FR0 100	Rips Redwoods (Sonoma County, CA)	12 3.2 12	38 .7 11	Coast Redwood / Douglas-fir Mixed Conifer and Northern California Coast Mixed Oak Woodland	Ear ly Act ion	14 26	57 7	2013- 2014	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1015&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%201015	#(2013); \$(2013) ~7 months	%%Project Design Document, Section 2.B.B. Carbon Sinks, Sources and Reservoirs, IFM-6, absent
3 6	<u>CAR1</u> 032	NA	CA FR5 037	Virginia Highlands I (Russell, Buchanan and Dickenson Counties, VA)	- 82. 34 7	37 .0 85	oak-hickory, loblolly- shortleaf pine, and mixed oak- pine	Co mp lia nce	9, 75 3	3,9 47	2013	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1032&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2013); \$(2013) ~ 7 months	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, Not applicable
3 7	<u>CAR1</u> 041	NA	CA FR5 038	Sacrament o Canyon ARB001 (Shasta County, CA)	- 12 2.2 9	41 .0 5	Southern Cascade, Mixed Conifer	Co mp lia nce	16 ,9 41	6,8 56	2015- 2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1041&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2015); %(2015) 2013, 2014, 2015; \$(2016) 2015, 2016; \$(2017) 2016, 2017	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, Not applicable
3	CAR1	NA	CA FR5	Trinity Timberlan	- 12	40 .5	"Northern California Coast	Co mp	11 ,9	4,8	2014	IFM	https://thereserve2.apx.com/mymodule/reg/TabProjectEmissions.asp?id1=1046&a	NA	#(2014); \$(2013)	%%Application for Listing, Part VII, Carbon Stock

8	046		076	ds University Hill Project (Trinity County, CA)	3.5	8	(Coast Redwood/Doug las Fir Mixed Conifer) & Southern Cascades (Southern Cascade Mixed Conifer)"	lia nce	00	16			d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub		~10 months; %(2013) 2013, 2014	Inventory, IMF-6, Not applicable (Attachment E)
3 9	<u>CAR1</u> 066	NA	CA FR5 058	Buck Mountain ARB002 (Siskiyou County, CA)	12 1.8 5	41 .3 8	Southern Cascade, Mixed Conifer	Co mp lia nce	12 ,4 86	5,0 53	2015- 2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1066&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2015); \$(2015) ~9 months; \$(2015) 2014, 2015; \$(2016)20 15, 2016; \$(2017) 2016, 2017	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, Not applicable
4 0	<u>CAR1</u> <u>067</u>	NA	CA FR5 063	Sustainable Mountain (Humboldt County, CA (near Willow Creek)	12 3.7 6	40 .9 1	Douglas Fir Mixed Conifer	Co mp lia nce	2, 11 2	85 5	2015	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1067&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	\$(2014) ~ 6 months; %(2014) 2013, 2014	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, excluded
4 1	CAR1 092	NA	CA FR5 087	Big Valley (Near Aiden, CA)	- 12 1.2 4	41 .1 3	Douglas Fir Mixed Conifer	Act ive	14 ,6 22	5,9 17	2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1092&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2016); %(2016) 2014, 2015, 2016	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, Not applicable
4 2	<u>CAR1</u> <u>094</u>	NA	CA FR5 095	Ashford III (Ashford, WA)	12 2.0 4	46 .4 6	Northwest Cascade Mixed Conifer	Co mp lia nce	52 90	2,1 41	2014	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1094&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2014); %(2014) 2012, 2013, 2014	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, Not applicable
4 3	<u>CAR1</u> 095	NA	CA FR5 096	Brushy Mountain (Mendocin o County, CA)	12 3.2 6	39 .6 3	Southern Cascade Mixed Conifer	Co mp lia nce	16 ,3 92	6,6 34	2014-2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1095&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2014); \$(2014) ~ 8 months; \$(2016) 2015, 2016; %(2015) 2014, 2015; %(2016) 2015, 2016; %(2017) 2016, 2017;	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, excluded (Addendum to Listing Application)
4	CAR1	NA	CA FR5	Montesol Forest	- 12	38 .6	Southern Cascade Mixed	Co mp	3, 10	1,2	2016	IFM	https://thereserve2.apx.com/mymodule/reg/TabProjectEmissions.asp?id1=1102&a	NA	#(2016); \$(2016) ~	%%Application for Listing, Part VII, Carbon Stock

4	<u>102</u>		148	Carbon (Napa and Lake County, CA)	2.5 64	71	Conifer	lia nce	2	55			d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub		7 months	Inventory, IMF-6, Not applicable
4 5	CAR1 103	NA	CA FR5 149	Forest Carbon Partners – Glass Ranch Improved Forest Manageme nt Project (Humboldt County, CA)	12 3.6 44	40 .3 46	Southern Cascade Mixed Conifer	Co mp lia nce	22 ,6 76	9,1 77	2015	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1103&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2015); %(2015) 2014, 2015	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, Not applicable
4 6	CAR1 104	NA	CA FR5 150	Forest Carbon Partners – Gabrych Ranch Project (Humboldt County and Trinity County, CA)	12 3.6 06	40 .7 13	Southern Cascade Mixed Conifer	Co mp lia nce	4, 03 9	1,6 35	2015	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1104&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2015); %(2015) 2014, 2015	%%Application for Listing, Part VII, Carbon Stock Inventory, IMF-6, Not applicable
4 7	<u>CAR1</u> <u>114</u>	NA	CA FR5 114	Crane Valley	12 3.6 06	40 .7 13	Southern Cascade Mixed Oak Woodland and Sierra Mixed Oak Woodland	Co mp lia nce	19 ,3 84	7,8 44	2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?r=111&ad=P rpt&act=update&type=PRO&aProj=pub& tablename=cr&id1=1114	NA	#(2016); %(2016) 2014, 2015, 2016	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): N/A
4 8	<u>CAR1</u> <u>175</u>	NA	CA FR5 195	Finite Carbon – Passamaqu oddy Tribe (Frankin, Somerset, Penobscot, Hancock, and Washingto n Counties, ME)	- 67. 63	45 .2 88	New Brunswick Foothills & Lowlands, White Mountains Mixed Hardwoods	Co mp lia nce	98 ,4 92	39, 85 8	2015- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1175&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2015); %(2015) 2014, 2015; %(2016) 2015, 2016; %(2016) 2015, 2016	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Excluded
4 9	<u>CAR1</u> <u>180</u>	NA	CA FR5 280	Maillard Ranch (Mendocin o County, CA)	12 3.3 6	39 .9 2	Temperate coniferous	Co mp lia nce	12 ,3 60	5,0 02	2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1180&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2016); %(2016) 2015, 2016	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Excluded"

5 0	<u>CAR1</u> 183	NA	CA FR5 283	Forest Carbon Partners- Mescalero Apache Tribe (Otero & Lincoln County, NM)	- 10 5.6 5	33 .1 7	Red Spruce and Eastern Hemlock	Co mp lia nce	22 1, 82 2	89, 76 8	2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?r=111&ad=P rpt&act=update&type=PRO&aProj=pub& tablename=cr&id1=1183	NA	#(2016); \$(2016) ~10 months; %(2016) 2015, 2016	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Not Applicable
5 1	<u>CAR1</u> <u>191</u>	NA	CA FR5 291	Hollow Tree (Mendocin o County, CA)	12 3.7 82	39 .8 5	Coast Redwood/Doug las-fir Mixed Conifer	Co mp lia nce	20 ,2 95	8,2 13	2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabDocuments.asp?r=111&ad=Prpt&a ct=update&type=PRO&aProj=pub&table name=doc&id1=1191	NA	#(2016); %(2016) 2015, 2016	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Not Applicable
5 2	<u>CAR1</u> 197	NA	CA FR5 297	Upper Hudson Woodland s ATP, LP (Warren, Hamilton, Essex, Washingto n, Saratoga and Fulton, NY)	- 74. 33	43 .8 8	Mixed conifer/mixed hardwood forest	Co mp lia nce	86 ,8 25	35, 13 7	2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1197&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2017); %(2017) 2015, 2016, 2017	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Excluded
5 3	<u>CAR1</u> 204	NA	CA FR5 304	AMC Silver Lake (Piscataqui s & Aroostook Counties, ME)	- 69. 15	45 .4 4	Spruce-Fir and Mixed Hardwood forests	Co mp lia nce	89 ,3 15	36, 14 5	2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1204&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	#(2017); %(2017) 2015, 2016, 2017	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Excluded
5 4	<u>CAR1</u> 209	NA	CA FR5 309	Wolf River (Antigo, WI)	- 88. 86	45 .2 3	Northern hardwood/mixe d conifer forestland	Co mp lia nce	17 ,7 22	7,1 72	2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?r=111&ad=P rpt&act=update&type=PRO&aProj=pub& tablename=cr&id1=1209	NA	#(2017); %(2017) 2015, 2016, 2017	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Excluded
5 5	<u>CAR1</u> 213	NA	CA FR5 313	MWF Adirondac ks (Franklin, St. Lawrence & Lewis Counties, NY)	- 74. 91	44 .3 5	Adirondacks & Green Mountains Northern Hardwood	Co mp lia nce	10 0, 09 4	40, 50 7	2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?r=111&ad=P rpt&act=update&type=PRO&aProj=pub& tablename=cr&id1=1213	NA	#(2017); %(2017) 2015, 2016, 2017	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Excluded"
5 6	<u>CAR1</u> <u>215</u>	NA	CA FR5 315	Molpus Ataya (Campbell &	- 83. 89	36 .5 4	Allegheny & North Cumberland Mountains -	Co mp lia	26 ,2 61	10, 62 7	2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?r=111&ad=P rpt&act=update&type=PRO&aProj=pub&	NA	#(2017); %(2017) 2015,	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable):

				Claiborne Counties, TN)			Mixed Pine Hardwood, Cove Forests, Northern Hardwoods, Oak - Hickory	nce					tablename=cr&id1=1215		2016, 2017	Excluded
5 7	<u>CAR1</u> <u>217</u>	NA	CA FR5 317	West Grand Lake (Washingt on County, ME)	- 67. 75	45 .2 3	New Brunswick Foothills & Lowlands, White Mountains Mixed Hardwoods	Co mp lia nce	19 ,5 52	7,9 12	2015	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?r=111&ad=P rpt&act=update&type=PRO&aProj=pub& tablename=cr&id1=1217	NA	#(2015); %(2015) 2013, 2014, 2015	%%PART VII. CARBON STOCK INVENTORY IFM-6 Soil (if applicable): Excluded"
5 8	<u>CAR9</u> <u>73</u>	NA	CA FR5 003	Bishop Project (Near Bessemer, MI, and other locations)	87. 85 2	46 .5 62 0	Tree cover, broadleaved, deciduous, closed to open (>15%)	NA	2, 11 2. 86	85 5.0 44 86 2	2013- 2016	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=973&ad =Prpt&act=update&sBtn=&r=111&Type= PRO&tablename=cr&aProj=pub	https://thereserve2.apx.co m/myModule/rpt/myrpt. asp?r=802&md=Prpt&id1 =%201004	\$2013	%% Blue Source - Bishop Improved Forest Management Project ARB Project Listing Form Attachments February 4, 2013, Part V.B, Soil carbon excluded.
5 9	<u>CAR1</u> <u>004</u>	NA	NA	Berry Summit (Near Eureka, CA	- 12 3.7 58	40 .9 05	Tree cover, needle leaved, evergreen, closed to open (>15%)	NA	2, 11 2. 86		2013	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1004&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	\$2013	%% Project Description Document, Table 5, IFM-6 not included
6 0	<u>CAR1</u> <u>174</u>	NA	CA FR5 224	Eddie Ranch (Mendocin o County, CA)	- 12 3.1 7	39 .4 56	Tree cover, needle leaved, evergreen, closed to open (>15%)	NA	2, 28 6		2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1174&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	\$2017, %2017	%% Application for Listing, Part VII-A, IFM-6, Soil Carbon, not applicable
6	<u>CAR1</u> 190	NA	CA FR5 220	Greenwoo d Creek (Mendocin o County, CA)	12 3.6 31	39 .0 73	Tree cover, needle leaved, evergreen, closed to open (>15%)	NA	8, 65 9	3,5 94. 17	2015- 2017	IFM	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1190&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	\$2015- 2016- 2017; %2015, 2016, 2017	%% Application for Listing, Part II-C, IFM-6, Soil Carbon, not applicable
6 2	CAR1 262	NA	NA	San Juan Lachao Pueblo Nuevo, Oaxaca, Mexico	- 97. 12 5	16 .1 58	Tree Cover, broadleaved, deciduous, closed	NA	32 ,8 40 .3 1	13, 29 0	2014- 2016	Forest ry	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1262&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	\$2014, 2015, 2016; %2014, 2015	%% Carbono en el suelo: No se incluye, REPORTE DE PROYECTO Captura de Carbono en San Juan Lachao, Oaxaca San Juan Lachao Pueblo Nuevo, Oaxaca 11 de octubre de 2017 CAR1262
6 3	<u>CAR1</u> <u>306</u>	NA	NA	Ejido San Nicolás Totolapan, CDMX, Mexico	- 99. 25 44	19 .2 99 4	Tree cover, broadleaved, deciduous, closed to open (>15%)	NA	5, 30 2. 83	2,1 45. 98	2017- 2018	Forest ry	https://thereserve2.apx.com/mymodule/r eg/TabProjectEmissions.asp?id1=1306&a d=Prpt&act=update&sBtn=&r=111&Type =PRO&tablename=cr&aProj=pub	NA	\$2017, 2018	%% https://thereserve2.apx.com/ mymodule/reg/TabDocume nts.asp?r=111&ad=Prpt&act =update&type=PRO&aProj= pub&tablename=doc&id1=1



															306
*/	nomalous	Features													
#	Vintage ye	ar is an ou	tlier def	ined in Figur	e 1 (a).	Issue	date may vary.								
^/	Backward	model rep	orting y	ear run (in p	arenth	esis) f	or the interval noted	d. Issue da	te may	vary.					
##	Forward 1	nodel repo	orting ye	ear run (in pa	renthe	sis) fo	or the interval noted	. Issue date	e may	vary.					
\$	A single vi	ntage year	(in pare	enthesis) is re	eported	l as a p	partial year or a sing	gle vintage	year is	split rep	resentin	g two or more reported carbon sequestr	ation intervals as indicate	d. Issue date	may vary.
	Ü	0 1				•									
\$9	Exact valu	ıes (in pare	enthesis	) for carbon s	sequest	ration	n are repeated over i	interval as	indica	ed. Issue	date ma	y vary.			
%	A single v	intage year	r (in pai	enthesis) rep	resents	s two	or more reported ye	ears and or	multi	ole net ca	rbon seq	uestration years as indicated. Issue date	e may vary.		
												•			
**	Project size	ranged fr	om 221,	822 to 106 acr	res witl	h a me	ean size of 21,256 ac	res, standa	ard dev	riation of	37,451 a	cres. Issue date may vary.			
	,	Ü													



%% Soil carbon pool excluded and not directly measured as specified in project documentation.

IFM: Improved Forest Management. This protocol applies to forest offset projects that involve management activities that maintain or increase carbon stocks on forested land relative to baseline levels of carbon stocks.

AC: Avoided Conversion. This protocol applies to forest offset projects that involve preventing the conversion of forestland to a non-forest land use by dedicating the land to continuous forest cover through a qualified conservation easement or transfer to public ownership, excluding transfer to federal ownership.

Footnote 1: For example, CAR 101 (Van Eck), CAR 102 (Garcia River), CAR 408 (Big River) and, CAR 429 (McCloud River) provide Project Activity (Tons), Confidence Deduction, Adjusted Project Activity and Baseline values for annual increments in the Cumulative Performance Reports page for each project (Table I). Values for "Project Activity (tons)", if interpreted as annual gross primary productivity, suggested by CARB-CAR equations (Supplement 2; "actual onsite carbon" as above ground carbon pools), yield a mean of 16,941.4 ± 4,694.2 gC m<sup>-2</sup>yr<sup>-1</sup> (n=39 annual, CAR101,102,408,429) compared to GPP reported for NEE1 (n = 50 sites, 487 annual values) of 1,269.8 ± 636<sup>65</sup>. The CARB-CAR values are in excess ~13x and ~7x of NEE1 mean and standard deviation, respectively, demonstrating the extreme and irreconcilable characteristics of the CARB-CAR methods. Initial-year data for the aforementioned sites (CAR101,102,408,429) were zero or small relative to the magnitude of project activity and baseline (e.g., CAR408, 1.4%) (Table I).



#### Table 2(on next page)

Results of hypothesis test for all annual data

Results of a hypothesis test with a null hypothesis that the difference between the CARB-CAR and the NEE1 means is under the allowed 5% threshold. The test is performed separately for all years between 2002 and 2014, the p-values are recorded in the last two rows.

1

- 3 Table II. Results of a hypothesis test with a null hypothesis that the difference between the CARB-CAR
- 4 and the NEE1 means is under the allowed 5% threshold. The test is performed separately for all years
- 5 between 2002 and 2014, the p-values are recorded in the last two rows.

6

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
CARB-CAR mean	-742.31	-719.94	-539.51	-1021.7	-2038	-992.42	-950.47	-593.86	-983.74	-725.04	-682.77	-865.27	-999.38	-1432.7
CARCAR SD	928.79	585.94	1049.3	683.21	3433.1	1418.7	1170.2	644.84	1460.8	1190.5	1049.7	1541.1	1590.6	1835.7
CARB-CAR (n)	2	5	9	9	12	23	24	25	32	32	31	32	30	23
NEE1 mean	-190.55	-189.15	-243.45	-267.26	-225.08	-241.51	-217.16	-206.75	-184.51	-92.287	-93.452	-53.874	-2.375	-9.2857
NEE1 SD	249.06	266.8	268.25	250.02	243.39	237.56	254.86	275.89	244.93	231.71	161.39	199.85	214.46	207.25
NEE1 (n)	40	48	45	42	44	42	41	31	24	17	12	11	8	7
p-value	0.009	0.001	0.065	0.000	0.001	0.001	0.000	0.004	0.008	0.024	0.039	0.055	0.052	0.032
p-value in %	0.87	0.05	6.53	0.00	0.07	0.13	0.03	0.36	0.81	2.37	3.88	5.48	5.24	3.25

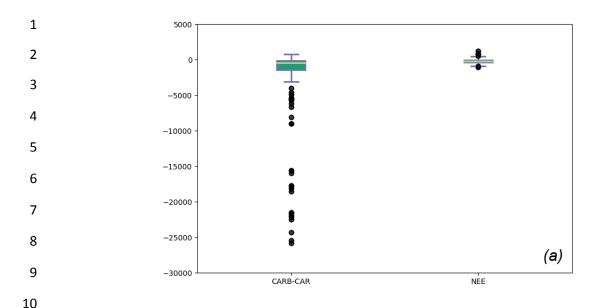


#### Table 3(on next page)

Box plots for CARB-CAR and NEE1 data analyzed in this study

**Figure 1 (a)**. Figure 1 presents a box plot of annual records from CARB-CAR (340 years, 63 sites) and NEE1 (540 years, 59 sites) projects. The box plots show the median (white line through each box), the  $25^{th}$  percentile (bottom of lower box), the  $75^{th}$  percentile (top of upper box), the upper and lower whiskers represent the upper and lower values that are not outliers, and outliers (individual closed circles). The CARB-CAR data show outliers exceeding -12,000 gC m<sup>-2</sup>yr<sup>-1</sup>. CARB-CAR median is -445.1 gC m<sup>-2</sup> yr<sup>-1</sup> compared to the NEE1 median value of -172.5 gC m<sup>-2</sup> yr<sup>-1</sup>. The means and standard deviations ( $\pm$ ) are, -948.8  $\pm$  1504.8 and -198.2  $\pm$  261.6, for CARB-CAR and NEE1, respectively.

Figure 1 (b). Box plots, described as above, for CARB-CAR and NEE1 populations with CARB-CAR outliers removed.



**Figure 1 (a).** Figure 1 presents a box plot of annual records from CARB-CAR (340 years, 63 sites) and NEE1 (540 years, 59 sites) projects. The box plots show the median (white line through each box), the 25<sup>th</sup> percentile (bottom of lower box), the 75<sup>th</sup> percentile (top of upper box), the upper and lower whiskers represent the upper and lower values that are not outliers, and outliers (individual closed circles). The CARB-CAR data show outliers exceeding -12,000 gC m<sup>-2</sup>yr<sup>-1</sup>. CARB-CAR median is -445.1 gC m<sup>-2</sup> yr<sup>-1</sup> compared to the NEE1 median value of -172.5 gC m<sup>-2</sup> yr<sup>-1</sup>. The means and standard deviations (±) are, -948.8 ± 1504.8 and -198.2 ± 261.6, for CARB-CAR and NEE1, respectively.

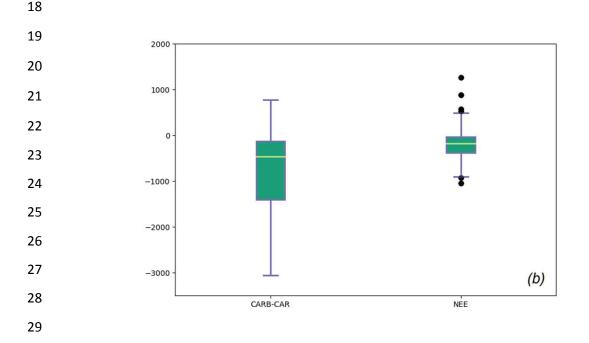


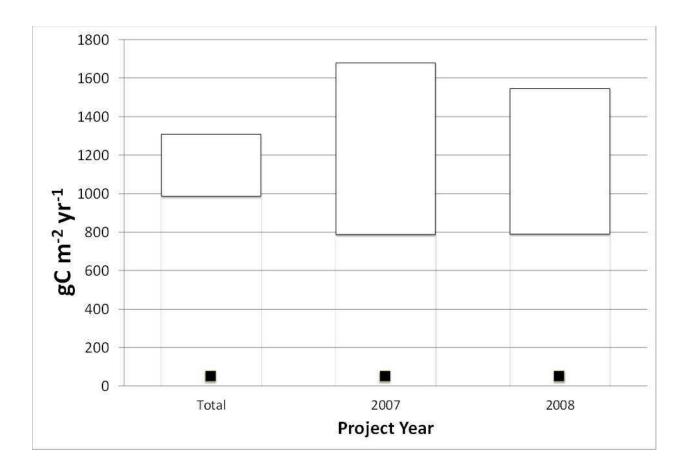
Figure 1 (b). Box plots, described as above, for CARB-CAR and NEE1 populations with CARB-CAR outliers removed.



#### Figure 1(on next page)

Plot of 95% confidence interval for the difference in means between CARB-CAR and NEE1 annual data

**Figure 2**. Plot of the 95% confidence interval for the difference in means between the CARB-CAR and NEE1 measurements. The combined data set (All Years) consists of 340 CARB-CAR and 540 NEE1 data points. A formula for a large-sample confidence interval (described in Methods) is used for the unfilled bars and no assumption on equal standard deviations between the two data sets has been made



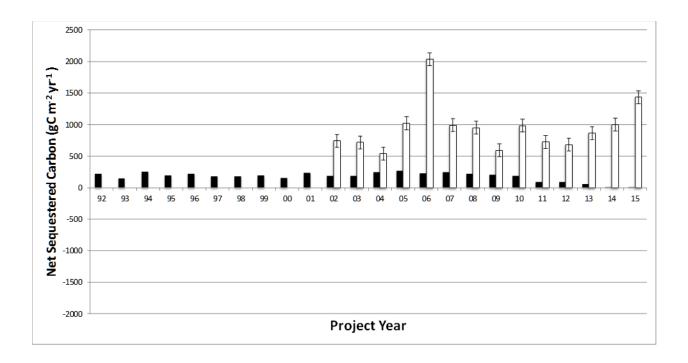
**Figure 2**. Plot of the 95% confidence interval for the difference in means between the CARB-CAR and NEE1 measurements. The combined data set (All Years) consists of 340 CARB-CAR and 540 NEE1 data points. A formula for a large-sample confidence interval (described in Methods) is used for the unfilled bars and no assumption on equal standard deviations between the two data sets has been made.



#### Figure 2(on next page)

Time interval plot of CARB-CAR and NEE1 annual data.

**Figure 3.** Time interval plot of CARB-CAR data (open bars) from 2002 to 2015 and NEE1 measurements <sup>65</sup> (filled bars) from 1992 to 2015. Values are plotted as positive numbers representing net sequestration of carbon. The averages for the two data sets are shown by each bar representing forest carbon sequestration calculated annually over all available locations. The error bars represent 5% of the CARB-CAR year for 2006 and applied to all CARB-CAR project annual averages.



**Figure 3.** Time series plot of CARB-CAR data (open bars) from 2002 to 2015 and NEE1 measurements<sup>65</sup> (filled bars) from 1992 to 2015. Values are plotted as positive numbers representing net sequestration of carbon. The averages for the two data sets are shown by each bar representing forest carbon sequestration calculated annually over all available locations. The error bars represent 5% of the CARB-CAR year for 2006 and applied to all CARB-CAR project annual averages.