# EARLY ACTION DESK REVIEW FINDINGS

## EARLY ACTION DESK REVIEW FINDINGS

<table>
<thead>
<tr>
<th>ARB Staff Use Only</th>
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<th>Date Findings Received:</th>
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## PART I. VERIFICATION BODY INFORMATION

<table>
<thead>
<tr>
<th>Verification Body Name:</th>
<th>Environmental Services, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verification Body ID Number:</td>
<td>H2-12-002</td>
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## PART II. EARLY ACTION PROJECT INFORMATION

<table>
<thead>
<tr>
<th>Early Action Project Name:</th>
<th>Green Assets-Middleton Avoided Conversion</th>
</tr>
</thead>
<tbody>
<tr>
<td>EAOP Project ID#:</td>
<td>CAR749</td>
</tr>
<tr>
<td>ARB Project ID# (if known):</td>
<td>CAFR0063</td>
</tr>
<tr>
<td>Name of Party Requesting Desk Review:</td>
<td>Middleton Place, LLC</td>
</tr>
<tr>
<td>Offset Project Data Report (Reporting Period) Start Date:</td>
<td>12/20/2007</td>
</tr>
<tr>
<td>Offset Project Data Report (Reporting Period) End Date:</td>
<td>12/31/2007</td>
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</table>

**Note:** A separate Early Action Desk Review Findings must be provided for each Offset Project Data Report (Reporting Period) for which an Early Action Verification Report and Offset Verification Statement is being reviewed.

## PART III. DESK REVIEW FINDINGS

1. **Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program?**
   - [ ] Yes
   - [ ] No

2. **Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology?**
   - [ ] Yes
   - [ ] No

3. **Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable Offset Project Data Report year?**
   - [ ] Yes
   - [ ] No

If the verification body answered no to any of the three questions above, please do not sign the attestation in Part IV. Please provide a report to ARB that explains the reasons for your findings and provide your signature here in Part III.

**SIGNATURE:**

**PRINTED NAME:**

**TITLE:**

**DATE:**

## PART IV. VERIFICATION BODY ATTESTATION AND SIGNATURE

If the verification body answered yes to all of the questions in Part III above, please provide your signature below.

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable Offset Project Data Report year. I further certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

**SIGNATURE:**

**PRINTED NAME:** Caitlin Sellers

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Email the information in this form to ghgoffsetverification@arb.ca.gov

Page 1 of 4
Email the information in this form to

ghgoffsetverification@arb.ca.gov
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### PART I. VERIFICATION BODY INFORMATION

Verification Body Name: Environmental Services, Inc.  
Verification Body ID Number: H2-12-002

### PART II. EARLY ACTION PROJECT INFORMATION

Early Action Project Name: Green Assets-Middleton Avoided Conversion  
EAOP Project ID#: CAR749  
ARB Project ID# (if known): CAFR0063

Name of Party Requesting Desk Review: Middleton Place, LLC

Offset Project Data Report (Reporting Period) Start Date: 01/01/2008  
Offset Project Data Report (Reporting Period) End Date: 12/31/2008

Note: A separate Early Action Desk Review Findings must be provided for each Offset Project Data Report (Reporting Period) for which an Early Action Verification Report and Offset Verification Statement is being reviewed.

### Part III. DESK REVIEW FINDINGS

1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program?  
   - [x] Yes  
   - [ ] No

2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology?  
   - [x] Yes  
   - [ ] No

3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable Offset Project Data Report year?  
   - [x] Yes  
   - [ ] No

If the verification body answered no to any of the three questions above, please do not sign the attestation in Part IV. Please provide a report to ARB that explains the reasons for your findings and provide your signature here in Part III.

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### Part IV. VERIFICATION BODY ATTESTATION AND SIGNATURE

If the verification body answered yes to all of the questions in Part III above, please provide your signature below.

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable Offset Project Data Report year. I further certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

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<td>Caitlin Sellers</td>
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<tr>
<td>ARB Lead Verifier (H2-12-137)</td>
<td>25 March 2014</td>
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## PART I. VERIFICATION BODY INFORMATION

Verification Body Name: Environmental Services, Inc.

Verification Body ID Number: H2-12-002

## PART II. EARLY ACTION PROJECT INFORMATION

Early Action Project Name: Green Assets-Middleton Avoided Conversion

EAOP Project ID#: CAR749

ARB Project ID# (if known): CAFR0063

Name of Party Requesting Desk Review: Middleton Place, LLC

Offset Project Data Report (Reporting Period) Start Date: 01/01/2009

Offset Project Data Report (Reporting Period) End Date: 12/31/2009

**Note:** A separate Early Action Desk Review Findings must be provided for each Offset Project Data Report (Reporting Period) for which an Early Action Verification Report and Offset Verification Statement is being reviewed.

## PART III. DESK REVIEW FINDINGS

1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program?  
   - Yes  
   - No

2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology?  
   - Yes  
   - No

3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable Offset Project Data Report year?  
   - Yes  
   - No

If the verification body answered no to any of the three questions above, please do not sign the attestation in Part IV. Please provide a report to ARB that explains the reasons for your findings and provide your signature here in Part III.

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## Part IV. VERIFICATION BODY ATTESTATION AND SIGNATURE

If the verification body answered yes to all of the questions in Part III above, please provide your signature below.

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable Offset Project Data Report year. I further certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

**SIGNATURE:**

**PRINTED NAME:** Caitlin Sellers

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PART I. VERIFICATION BODY INFORMATION

Verification Body Name: Environmental Services, Inc.  
Verification Body ID Number: H2-12-002

PART II. EARLY ACTION PROJECT INFORMATION

Early Action Project Name: Green Assets-Middletown Avoided Conversion  
EAOP Project ID#: CAR749  
ARB Project ID# (if known): CAFR0063

Name of Party Requesting Desk Review: Middleton Place, LLC
Offset Project Data Report (Reporting Period) Start Date: 01/01/2010  
Offset Project Data Report (Reporting Period) End Date: 12/31/2010

Note: A separate Early Action Desk Review Findings must be provided for each Offset Project Data Report (Reporting Period) for which an Early Action Verification Report and Offset Verification Statement is being reviewed.

PART III. DESK REVIEW FINDINGS

1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program?  
   [ ] Yes  [ ] No

2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology?  
   [ ] Yes  [ ] No

3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable Offset Project Data Report year?  
   [ ] Yes  [ ] No

If the verification body answered no to any of the three questions above, please do not sign the attestation in Part IV. Please provide a report to ARB that explains the reasons for your findings and provide your signature here in Part III.

SIGNATURE:  
DATE:  
TITLE:  
PRINTED NAME:  

PART IV. VERIFICATION BODY ATTESTATION AND SIGNATURE

If the verification body answered yes to all of the questions in Part III above, please provide your signature below.

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable Offset Project Data Report year. I further certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

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DATE:  
TITLE:  
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Email the information in this form to ghgoffsetverification@arb.ca.gov
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PART I. VERIFICATION BODY INFORMATION

Verification Body Name: Environmental Services, Inc.
Verification Body ID Number: H2-12-002

PART II. EARLY ACTION PROJECT INFORMATION

Early Action Project Name: Green Assets-Middleton Avoided Conversion
EAOP Project ID#: CAR749
ARB Project ID# (if known): CAFR0063

Name of Party Requesting Desk Review: Middleton Place, LLC
Offset Project Data Report (Reporting Period) Start Date: 01/01/2011
Offset Project Data Report (Reporting Period) End Date: 02/20/2011

Note: A separate Early Action Desk Review Findings must be provided for each Offset Project Data Report (Reporting Period) for which an Early Action Verification Report and Offset Verification Statement is being reviewed.

PART III. DESK REVIEW FINDINGS

1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program?
   - Yes
   - No

2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology?
   - Yes
   - No

3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable Offset Project Data Report year?
   - Yes
   - No

If the verification body answered no to any of the three questions above, please do not sign the attestation in Part IV. Please provide a report to ARB that explains the reasons for your findings and provide your signature here in Part III.

SIGNATURE: [Signature]
PRINTED NAME: [Name]
TITLE: [Title]
DATE: [Date]

PART IV. VERIFICATION BODY ATTESTATION AND SIGNATURE

If the verification body answered yes to all of the questions in Part III above, please provide your signature below.

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable Offset Project Data Report year. I further certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

SIGNATURE: [Signature]
PRINTED NAME: Caitlin Sellers

Email the information in this form to gshoffsetverification@arb.ca.gov
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</table>

#### PART I. VERIFICATION BODY INFORMATION

Verification Body Name: Environmental Services, Inc.  
Verification Body ID Number: H2-12-002

#### PART II. EARLY ACTION PROJECT INFORMATION

Early Action Project Name: Green Assets-Middleton Avoided Conversion  
EAOP Project ID#: CAR749  
ARB Project ID#: CAFR0063  
Name of Party Requesting Desk Review: Middleton Place, LLC

- Reporting Period Start Date: 21 February 2011  
- Reporting Period End Date: 31 December 2011

**Note:** A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.

#### Part III. ATTACHMENT

- Report Detailing the Desk Review Findings

#### Part IV. DESK REVIEW FINDINGS SUMMARY

1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program?  
   - Yes  
   - No

2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology?  
   - Yes  
   - No

3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable early action reporting period?  
   - Yes  
   - No

#### Part V. VERIFICATION BODY ATTESTATION AND SIGNATURE

*If the verification body answered "No" to any of the three questions in Part IV, sign this form in Part V.A immediately below. If the verification body answered "Yes" to all three questions, provide the attestation in Part V.B.*

#### Part V.A. LEAD VERIFIER SIGNATURE IF NOT CONCURRING

<table>
<thead>
<tr>
<th>SIGNATURE:</th>
<th>PRINTED NAME:</th>
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<td>TITLE:</td>
<td>DATE:</td>
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</table>

Email the information in this form to ghgoffsetverification@arb.ca.gov
**Part V.B. LEAD VERIFIER ATTESTATION AND SIGNATURE IF CONCURRING**

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable early action reporting period.

<table>
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<tr>
<th>ATTESTATION SIGNATURE:</th>
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<tr>
<td></td>
<td>Stewart McMorrow</td>
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<td>Updated v2-18 December 2014</td>
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**Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER**

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

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<tr>
<th>ATTESTATION SIGNATURE:</th>
<th>PRINTED NAME:</th>
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<tbody>
<tr>
<td></td>
<td>Janice McMahon</td>
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<tr>
<td>Vice President and Regional Technical Manager Forestry, Carbon, and GHG Services</td>
<td>18 December 2014</td>
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VO13052.01-Middleton CAR749 ARB EA desk findings-2011-final updated Dec2014.doc K pf 12/18/14f
PART I. VERIFICATION BODY INFORMATION

Verification Body Name: Environmental Services, Inc.

Verification Body ID Number: H2-12-002

PART II. EARLY ACTION PROJECT INFORMATION

Early Action Project Name: Green Assets-Middleton Avoided Conversion

EAOP Project ID#: CAR749
ARB Project ID#: CAFR0063

Name of Party Requesting Desk Review: Middleton Place, LLC

Reporting Period Start Date: 01 January 2012
Reporting Period End Date: 31 December 2012

Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.

Part III. ATTACHMENT

☐ Report Detailing the Desk Review Findings

Part IV. DESK REVIEW FINDINGS SUMMARY

1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program?
   - Yes □ No □

2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology?
   - Yes □ No □

3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable early action reporting period?
   - Yes □ No □

Part V. VERIFICATION BODY ATTESTATION AND SIGNATURE

If the verification body answered "No" to any of the three questions in Part IV, sign this form in Part V.A immediately below. If the verification body answered "Yes" to all three questions, provide the attestation in Part V.B.

Part VA. LEAD VERIFIER SIGNATURE IF NOT CONCURRING

SIGNATURE: __________________________

PRINTED NAME: ______________________

TITLE: __________________________

DATE: __________________________
**Part V.B. LEAD VERIFIER ATTESTATION AND SIGNATURE IF CONCURRING**

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable early action reporting period.

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**Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER**

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

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<td>Janice McMahon</td>
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**PART I. VERIFICATION BODY INFORMATION**

Verification Body Name: Environmental Services, Inc.  
Verification Body ID Number: H2-12-002

**PART II. EARLY ACTION PROJECT INFORMATION**

Early Action Project Name: Green Assets-Middleton Avoided Conversion  
EAOP Project ID#: CAR749  
ARB Project ID#: CAFR0063

Name of Party Requesting Desk Review: Middleton Place, LLC

Reporting Period Start Date: 01 January 2013  
Reporting Period End Date: 31 December 2013

*Note: A separate Early Action Desk Review Findings must be provided for each reporting period being reviewed.*

**PART III. ATTACHMENT**

- [ ] Report Detailing the Desk Review Findings

**PART IV. DESK REVIEW FINDINGS SUMMARY**

1. Were the previously provided offset verification services sufficient to render a reasonable assurance to support the issuance of early action offset credits by the Early Action Offset Program?  
   - Yes  
   - No

2. Were the data checks conducted by the offset verification body for the Early Action Offset Program calculated correctly and demonstrate the early action offset project data report meets the applicable quantitative materiality threshold as set forth in the early action quantification methodology?  
   - Yes  
   - No

3. Does this verification body conclude with reasonable assurance that it concurs that a positive verification statement should have been issued based on the Early Action Verification Report and the Offset Verification Statement submitted to the Early Action Offset Program for the applicable early action reporting period?  
   - Yes  
   - No

**PART V. VERIFICATION BODY ATTESTATION AND SIGNATURE**

If the verification body answered "No" to any of the three questions in Part IV, sign this form in Part V.A immediately below. If the verification body answered "Yes" to all three questions, provide the attestation in Part V.B.

**Part V.A. LEAD VERIFIER SIGNATURE IF NOT CONCURRING**

**SIGNATURE:**  
**PRINTED NAME:**  
**TITLE:**  
**DATE:**

Email the information in this form to ghgoffsetverification@arb.ca.gov
**Part V.B. LEAD VERIFIER ATTESTATION AND SIGNATURE IF CONCURRING**

I certify under penalty of perjury under the laws of the State of California that I have conducted a desk review in accordance with the requirements of section 95990(f)(3) and concur with the issuance of a positive verification statement based on the Early Action Verification Report and Offset Verification Statement that was submitted to the Early Action Offset Program for the applicable early action reporting period.

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<td>ARB Lead Verifier (H2-12-111)</td>
<td>Original - 30 July 2014</td>
</tr>
<tr>
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<td>Updated v2-18 December 2014</td>
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**Part V.C. SIGNATURE BY VERIFICATION BODY OFFICER**

I concur with the findings in this form and certify that I am duly authorized to represent and legally bind the Offset Verification Body on all matters related to this form.

<table>
<thead>
<tr>
<th>ATTESTATION SIGNATURE:</th>
<th>PRINTED NAME:</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Janice McMahon</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TITLE:</th>
<th>DATE:</th>
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<tbody>
<tr>
<td>Vice President and Regional Technical Manager Forestry, Carbon, and GHG Services</td>
<td>18 December 2014</td>
</tr>
</tbody>
</table>

Email the information in this form to ghgoffsetverification@arb.ca.gov