# EARLY ACTION DESK REVIEW FINDINGS

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<tr>
<th>ARB Staff Use Only</th>
<th>ARB Form Tracking Number</th>
<th>Date Findings Received</th>
<th>Date Findings Processed</th>
<th>Date Findings Reviewed</th>
<th>Date More Information Requested</th>
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## PART I. VERIFICATION BODY INFORMATION

**Verification Body Name:**
SCS Global Services

**Verification Body ID Number:**
H2-12-007

## PART II. EARLY ACTION PROJECT INFORMATION

**Early Action Project Name:**
Finite Carbon - Brosnan Forest

**EAOP Project ID #:**
CAR658

**ARB Project ID #:**
CAFR0087

**Name of Party Requesting Desk Review:**
Norfolk Southern Corporation

**Reporting Period Start Date:**
04/27/10

**Reporting Period End Date:**
12/31/10

**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. **Question:** 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?
   - **Answer:**
     - [ ] Yes
     - [x] No

2. **Question:** 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?
   - **Answer:**
     - [ ] Yes
     - [x] No

3. **Question:** 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?
   - **Answer:**
     - [ ] Yes
     - [x] 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:**

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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>
<td></td>
<td>Christie Pollet-Young</td>
<td>Director, Greenhouse Gas Verification Program</td>
<td>22 October 2015</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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**PART I. VERIFICATION BODY INFORMATION**

Verification Body Name: SCS Global Services  
Verification Body ID Number: H2-12-007

**PART II. EARLY ACTION PROJECT INFORMATION**

Early Action Project Name: Finite Carbon - Brosnan Forest  
EAOP Project ID#: CAR658  
ARB Project ID#: CAFR0087

Name of Party Requesting Desk Review: 
Norfolk Southern Corporation

Reporting Period Start Date: 01/1/11  
Reporting Period End Date: 12/31/11

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 ghgooffsetverification@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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