

Public Comments – Draft Mexico Forest Protocol V2.0

Dear Climate Action Reserve,

On behalf of the Centro de Investigación y Proyectos en Ambiente y Desarrollo (CIPAD), I submit the following comment regarding Section B1.1 of the Second Draft for Public Comment of the Mexico Forest Protocol, Versión 2.0.

Our comment is regarding the requirement that a minimum of 30 sample plots must be sampled in each Activity Area. We suggest that this requirement be eliminated. In the case of a single project with multiple activity areas or an aggregation of projects with multiple projects and activity areas, it is possible that a single activity area could be relatively small with a relatively uniform biomass distribution such that meeting the corresponding target sampling error at the 90% confidence level would require fewer than 30 sample plots. In this case, the additional minimum requirement of 30 sampling plots could result in significant additional inventory costs with a relatively insignificant increase in sampling precision.

Thanks you for the consideration of this suggestion.

Sincerely,

David Ross
Project Development Consultant
Centro de Investigación y Proyectos en Ambiente y Desarrollo (CIPAD)

I notice that in Version 2, the text regarding consideration of legal constraints under determining the baseline has been shortened and the text regarding that it is necessary to exclude areas from activity areas only for areas in which all harvesting is prohibited, has been eliminated. Could this cause any future problems? I recall a discussion we had a couple years ago in which we discussed that federal law significantly restricts harvesting nationwide in natural protected areas, along streams and other water bodies, on slopes greater than 45 degrees, above 3,000 meters, in mangroves and cloud forests, among others. But even though harvesting is significantly restricted in these areas, it is generally not restricted 100% and it was stated that these areas can be included in activity areas. For example, I believe that along streams only harvesting for saneamiento can potentially be approved. So I was wondering about whether the change in wording of Version 2 could affect the continued inclusion of these areas in activity areas.

Thanks,

David Ross
Project Development Consultant
Centro de Investigación y Proyectos en Ambiente y Desarrollo (CIPAD)