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Dear Climate Action Reserve:

I submit the following comments and questions regarding the draft Mexican Forest Protocol:

### **Section 3.4**

Comment 1: I suggest adding a separate list of the documents required for *ejidal* parcels with corresponding parcel certificates. Their requirements should not be the same as for communal *ejido* lands. For example, requirements #1 and #2 do not apply.

Comment 2: Footnote number 10 does not provide sufficient detail. How will the eligibility of property holders that legally possess their land but do not have a property title in their own name be assessed for eligibility case by case? Who will do this assessment, when and using what criteria? The use of certificates of legitimate possession issued by municipal authorities was a recommendation of the aggregation committee of the stakeholder workgroup in order to make this protocol more accessible to people living in conditions of poverty in Mexico. Not including this option will reduce participation.

### **Sections 3.4 and 3.5**

Comment 3: Projects that do not involve harvesting of forest products may not require a forest management plan under Mexican law. Establishing this as a requirement in all cases will create additional costs and further reduce participation of people living in conditions of poverty.

### **Section 3.10**

Comment 4: Although there may be a scientific justification for requiring monitoring and verification for a period of 100 years following the issuance of any CRT for GHG reductions or removals achieved by the project, there will be a significant tradeoff, as this will significantly decrease the use of the Mexican forest protocol. The requirement for annual monitoring reports seems excessive.

### **Section 3.11**

Comment 5: Similar to comment 1, I suggest a distinction between the requirements for common-use *ejido* lands and *ejido* parcel lands.

### **Sections 5 and 9.1**

Comment 6: There appears to be an inconsistency between these sections. Section 9.1 states that projects may extend beyond one UMAFOR, while Section 5 states that the Project Area must be limited to one forest management unit (Unidad de Manejo Forestal, UMAFOR). I recommend that projects be allowed to extend beyond one UMAFOR.

## **Table 8.2**

Comment 7: “Selva” is broader than “rainforests”. “Tropical forests” would a more accurate description for this category. Also, an equivalent for “vegetación hidrófila” may be missing from this table.

Comment 8: How is the ecosystem portion of the stratum defined using the guidance in Table 8.2 when the minimum area requirements in the table are not met?

## **Tables 8.3 and 8.4**

Comment 9: In the English version of the protocol, Tables 8.3 and 8.4 have some words in Spanish.

## **Section 9.2**

Comment 10: I suggest including more specific guidance of how to take into account legal constraints that are not enforced successfully or that have been enforced only partially.

Comment 11: Is it necessary to take into account enforcement trends, for example, in cases where enforcement is improving or deteriorating? Or would the adjustment be based only upon the current success rate of enforcement?

Thank you very much for the opportunity to submit comments.

Sincerely,

David Ross