

Comments received by the CCBA during the validation audit.

CCB Standards Second Edition

Project: **Bull Run Overseas Project**

Comment 1

Date: 18 February 2011

Sent by: Jol Hodgson

Bull Run Overseas Project : Critique by T.J.Hodgson MSc(Forestry).

I commend the CCB Standards for the transparency offered by this call for public comment and I present the following critique with the hope that the project proponents will revise the PDD to achieve validation at the highest level. The basic intent, to prevent further loss of the Mountain Pine Ridge *Pinus caribaea* forest is of global value.

I wish it were so simple...

G 2.2: Additionality

The full project fails the additionality requirement.

The project description states that the “current plan calls for clearing and leasing of the tropical hardwood component for conversion to agriculture **to generate the operating capital needed to manage the pine component of the property**”**. By this admission, the management of the pine component is not additional and therefore cannot be accounted as a carbon sink. The project area must then be confined to the 595 ha of hardwood forest identified as suitable for conversion to coffee plantation (section G 2.3).

Without sight of the Project financial accounts (section G 2.2) we can only presume that the entire 595 ha would be needed to generate the resources for managing the pine component of the property. Release of information by BRO on their 2004 coffee trials could substantiate this.

G 5.2: Documentation of Legal Approval & G5.6. Carbon Rights

The project states that: “The property is privately held and no approvals are required from the Government of Belize” and that:”FCO has a legally binding agreement with the landowner which transfers management of the environmental service rights of the property”.

In stating that the Government of Belize’s Designated National Authority to the UNFCCC is a stakeholder of this project (see G 3.8) the proponents should be aware that the Government of Belize is in the process of designing a “policy on Climate Change and Carbon Crediting” (ref. PM Dean Barrow) and has expressed a claim on environmental service rights – to an extent of 50%. Compliance with this policy is not mentioned in the PDD.

** This is in complete contradiction to the statement in G 2.3 that “Under the without-Project scenario the pine compartments will continue in their current degraded state due to frequent fire and no management inputs”.

CL 2.1 Leakage

Leakage will in effect negate all the emission reductions of the hardwood forest component.

The project description declares the non-project scenario as the “current plan calls for clearing and leasing of the tropical hardwood component for conversion to agriculture”. For this to be a legitimate plan there must be a demand, in Belize, that would be partially (?) satisfied by this conversion. Therefore, under the with-project scenario, the proposed lessee will meet this demand elsewhere in Belize – presumably in a similar forest-to-agriculture conversion, which would constitute leakage.

It is unfortunate that this declaration has been published, had the declaration simply excluded the words “and leasing” there would be no leakage as the landowner would be alternatively engaged.

Permanence : G3.4. Time-frame and Project Accounting

Why is the period of the project only 20 years? The temporary emission reductions will have a much-reduced value, and reduced even further if marketed ex-ante. The project would have greater credibility if the project period were increased or if the hardwood area could be deeded as National Park (adjoining the National Monument lands).

CM1.1. Community Benefits

The detail in this section is incorrect/incomplete.

The employment in the “without-Project scenario assumes a direct staffing level of only four people”.

The without-project scenario is land clearing of 595 ha and the establishment, maintenance, harvesting and processing of coffee – surely a very significant source of employment and of considerable benefit to the neighbouring communities.

However, if the pine forest were to be managed intensively the employment level could be competitive – but this would need a whole new set of financials and expertise.

CL1.3. Other GHG Emissions from Project Activities

GHG emissions from prescribed burning are anthropogenic and have to be accounted. As the pine component is outside the project boundary due to the additionality rule, but under the influence of the project, the anthropogenic emissions must be accounted as leakage and cannot be offset by any benefits.

CL1.5. Avoid Double-Counting

The PDD provides no assurance of avoidance of double-counting at the national level, only at the project level.

The tropical hardwood forest component will, almost certainly, be included in the national inventory of forested land and accounted in the national register of REDD – therefore this project must be formally registered with the Government of Belize to avoid double-counting.

G1.4. Carbon Stocks within the Project Area

It is stated that “based upon access slope and other factors only 595 ha of the 700 ha in the tropical hardwood compartment would be suitable for conversion. The areas suitable for conversion are those in which forest plots were allocated within the tropical hardwood compartment”. With reference to fig.5 and fig.7, sample plot allocation in the conversion area (only 10 plots) was limited “Because of the rough and inaccessible terrain”. This same inaccessibility would likely render conversion to coffee unlikely – so the PDD should provide more detail on the requirements for conversion or a revision of the area suitable for conversion, as required by the CCB Standards.

Judging by the contours, the elevation and aspect differences, together with the reported ecotype differences (fig.3) of the eastern and western coffee areas a stratified sampling would be indicated to raise the precision – the desired 20% precision was not achieved by sampling only 50% of the number of hardwood plots indicated by the preliminary study. The result in table 3 is, by the proponents’ own definition, unreliable and cannot be validated.

The methodology of pine measurement is rather obscure: The sampled trees were measured for dbh and (presumably, visually) assessed for height (categorized A to F), and then height is ignored in the allometric equation. The desired 20% precision was not achieved and the result in table 3 is, by the proponents’ own definition, unreliable and cannot be validated.

G 2.1 Baseline Land Use

Notwithstanding the ineligibility of the pine component carbon sequestration, this PDD is, by the author’s admission, not ready for validation without the pine projections. Presumably the public scrutiny will be re-opened when the document is ready?

Comment 2

Date: 21 February 2011

Sent by: Colleen & Alan Spring, Owners, Table Rock Jungle Lodge

We are writing on behalf of Table Rock Jungle Lodge to comment on the Bull Run Overseas Project. Table Rock Jungle Lodge is an eco-lodge committed to promoting sustainable practices in tourism, land management, and community development. We have been involved in the Cayo District for nearly nine years and are always thrilled to see operations, such as Bull Run Overseas, who are equally committed to these same lofty objectives.

We have known the owners of Bull Run for five years and can only offer high praise of their business dealings, treatment of their staff members, and strict management of their forests. In addition to being excellent neighbors and having been involved in the Mountain Pine Ridge Forest Reserve for decades, Bull Run goes out of its way to make a commitment to biodiversity research by hosting both Marcella Kelly's jaguar research project and the Peregrine Foundation's Orange Breasted Falcon project. Without assistance from Bull Run, these important research efforts would certainly find it much harder to be successful.

Comment 3

Date: 21 February 2011

Sent by: Julian Sherrard, Orange Gifts

As an avid reader of the Economist, I have been following the development of carbon sequestration for quite some time. To my pleasant surprise, I have recently found that Bull Run Overseas is working to develop one in the Mountain Pine Ridge. This is really good news!

On a continent that is beset with deforestation, poor land use and, in most cases, a total lack of proper land management, I feel that this project will be a boon for Belize, Central America and the World! The benefits are huge and spread across the spectrum: from local to global. On a local level, the proper management of the Pine Forest and Broad Leaf Forest will help minimize the possibility of accidental and runaway fires that can devastate forests and its wildlife, it will greatly reduce illegal logging and hunting, and it will employ Belizeans, providing them with good paying jobs that will increase their quality of life and positively impact the socio-economic situation of the villages the employees come from through the trickle-down effect of their income.

On a global aspect, it will help to offset some of the pollution coming from the industrial more-developed countries. This offset, when coupled with other similar endeavors, will provide climate and health benefits to every single human, animal and plant on the planet.

If there is a downside, it is that this project is not quadruple the size or even bigger!

Comment 4

Date: 22 February 2011

Sent by: Marta Curti, Field Biologist, The Peregrine Fund

I have been working in the Mountain Pine Ridge area since 2003, studying the rare Orange-breasted Falcon and other raptor species and would like to make some comments regarding the Bull Run Overseas, Ltd. Project.

The forests of the MPR are vital to the survival of many wildlife species and the transition zone between the pine forest and broad leaf forest in the MPR, in particular, is important habitat for many raptors as evidenced by the fact that in one small area within the Bull Run Overseas, Ltd. property, we found evidence of 3 extremely rare raptors nesting and utilizing habitat within this transition zone. From the beginning, BRO has been a key player in the conservation of wildlife and habitat in the MPR.

Our efforts to study and undertake a captive breeding and release program for the Orange-breasted Falcon would not have been possible without BRO support – whose commitment to biodiversity conservation and research is clear. Over the years, they have provided us with access to their land, materials, and an enormous amount of logistical assistance. I don't think there is anyone who knows the MPR better than George Headley. He is a wealth of knowledge and information and has been vital in helping us choose appropriate release sites and in helping us manage our conservation efforts. Perhaps the most important factor in their conservation efforts is the fact that they see, and work for, both the large picture (the forest as a whole), and the smaller details (individual species). The BRO supports student learning and has partnered with a wide variety of scientists and conservationists to preserve the MPR and its wildlife.

I believe their project should be fully supported and approved.

Comment 5

Date: 22 February 2011

Sent by: Robert Berry, Director, Orange-breasted Falcon Program

I am the Director of the Peregrine Fund, Inc. www.peregrinefund.org Orange-breasted Falcon (OBF) Program. The Peregrine Fund is a stakeholder in the Bull Run Overseas CCBS Project. I have personally worked with the OBF on behalf of the Fund since 1992. My role at that time was to develop a captive breeding protocol (successful) for this little known, but rare species along with a Fund supported first scientific study of the species conducted by Brigham Young University graduate student Aaron Baker (Baker et. Al 2000). In the 1990s, Baker located 19 OBF eyries, 12 in Belize and 6 in Guatemala. His study was thorough because during exhaustive ground and aerial survey in the last decade, we have located only one new breeding territory (2009). Seven of the 12 breeding territories occupied in the 1990s have been abandoned, including six and possibly seven in the Mountain Pine Ridge (MPR) of Belize. Baker's survey ended in 1997 and we began the survey again in 2003 which has not been expanded especially in 2010 to include the entire Maya Mountains, and suitable habitat in southern Guatemala and eastern Honduras. In 1999 and 2000, we conducted aerial and ground surveys throughout Central America and concluded that the species in Belize and Guatemala is probably isolated by 1500 kms from a small population (four pairs) in on the Columbian border of Panama (Thormstrom et al. 2002). We think the total OBF population in Belize and Guatemala is less than 30 pairs.

The MPR in the northern Maya Mountains is the epicenter of the northern OBF population, which in 1990s contained 12 breeding pairs. Probably because of human disturbance and a burgeoning human related Black Vulture population, which consumes falcon eggs and young, the population in the MPR is now only half of what it was a decade ago and productivity has also declined with the remaining pairs. There are three historic OBF territories (a high density for this species) in the MPR and one of these (Tiger falls occupied in 1991) may be an alternate to King Vulture Falls which was discovered in 1994. The third territory is located within a few hundred meter of the Bull Run property and is sited on the 1200 acre 1000 Foot Falls National Monument. The natural integrity of the Bull Run Overseas property is therefore critical not only to the OBF territories and the falcon's prey base on the Bull Run plateau, but protects the water sheds of several major rivers and streams such as Roaring Creek (one historic eyrie) and the Rio On (two historic eyries) that have created the species' specialized habitat of towering canyon cliffs within an intact broadleaf forest ecosystem. OBFs have never been found in savannah and will persist in a mosaic of habitats zones provided mature forest is the dominant landscape. Preservation of this critical habitat within and on the slopes of the plateau which makes up the Bull Run property is critical to the survival of this sedentary species which is now officially endangered and likely extinct in Mexico and Costa Rica, and critically endangered in Belize and Guatemala, although Belize and other Central American countries do not have such a designation (Berry et al. 2010)

OBFs seem to prefer a natural rugged heavily wooded habitat such as the pine scrublands interspersed with deep hardwood valleys which create the mosaic of habitat necessary to support their varied prey base. We theorize that maintenance of these zones is critical to maintain an adequate year round prey selection that varies with the seasons, a most difficult biome over which to hunt as the OBF is the only falcon species that has evolved to hunt entirely above the forest canopy. While the demographics of the species or even the maximum age is unknown, we feel that mortality from starvation is greater than other falcon species and probably approaches 70-80% for juveniles. Any disruption in the balance of their habitat might be catastrophic as appears to be happening with hydro projects along with Macal River which supported four territories in the past decade and is now down to two.

We feel that natural burning regimes and or fire breaks and/or selective logging to maintain the integrity of the woodland habitat and to suppress the danger of catastrophic fire would not be detrimental to the species provided the

immediate vicinity of the breeding territories are not molested during the breeding season and the long dependency period for their young which begins in February ending in September or October. It is our intention to perhaps expand our studies to both the OBF prey base and predators in the future.

The Bull Run Overseas landlords are also critical to our research by providing both logistical help and maintenance of our hack site which seeks to add genetic variability by adding unrelated captive bred progeny to the local populations. Our hack site for release is located on the southeast end of the property on a unique high knob overlooking the valley floor by about 1800 feet which offers significant protection to predation from local Black and White Hawk Eagles, another rare raptor species indigenous to the MPR and especially the Bull Run Overseas property.

Comment 6

Date: 23 February 2011

Sent by: Ron Colatskie, M.S. Forestry Candidate, University of Missouri

In my opinion the report submitted by Bull Run Overseas demonstrates a commitment to fulfilling CCB standards. The Mountain Pine Ridge ecosystem is currently responding to a variety of disturbance events which pose a real threat of permanent modification from the historic ecosystem. Compared to surrounding properties, Bull Run Overseas, from my observations, show the best potential for addressing climate change through restoration of this truly unique ecosystem.

The report demonstrates, in my eyes, a sustainable project which promotes biodiversity, supports surrounding communities, and sets an example for other land stewards in the region. If the committee decides to support this effort, you will find, as I did in working with the company on a collaborative research project one year ago, that you made the right decision.

Comment 7

Date: 23 February 2011

Sent by: Dr. Marcella Kelly, Associate Professor, Dept. of Fisheries and Wildlife Sciences, Virginia Tech

I have just finished reading the Bull Run Overseas Ltd.: Project Design Document. I enthusiastically support this project. As a university professor focusing on wildlife sciences, my comments will mostly be restricted (but not entirely) to the wildlife component of the BRO project. I have been conducting remote camera surveys for jaguars, pumas and ocelots in the Mountain Pine Ridge Forest Reserve (MPR) since 2004. These surveys have also included small parts of BRO property. I can attest that this area is unique –pine forest is very unusual and uncommon in the tropics. For this reason, I decided back in 2004 to survey for jaguars in order to compare this site to the nearby Chiquibul Forest Reserve (broadleaf forests). I have found similar numbers of large cats in both sites. Repeated surveys in the MRP have revealed that the same jaguars (the cats are uniquely identifiable by their coat patterns) occupy the MPR and BRO properties year round. This is contrary to common supposition that the pine forest did not hold many jaguars. I can attest that this site is contains jaguars and pumas (and smaller numbers of ocelots) that live their year-round. In addition, I obtain photographs of other wildlife species on my remote cameras including: Baird's tapirs (an endangered species of high conservation value, HCV), southern river otters, white-lipped peccaries, great curassows, ocellated turkeys, crested guan, etc. I applaud BRO's proposed monitoring program using remote cameras to survey for HCV species. This is an excellent technique for the purpose. I wish more CCB monitoring programs would address wildlife health and use standardized monitoring programs such as remote camera wildlife surveys. These surveys are relatively easy to implement and provide a wealth of information on the status and health of wildlife species, which are often overlooked in large scale monitoring projects.

This area of Belize is part of the Meso-american biological corridor, also known by some as the "path of the panther". One impetus of this corridor project was to create a corridor of continuous forest habitat the length of Central America. Belize has long been known as a stronghold for jaguars, but recent land conversion to agriculture and urban areas, has caused concern within Belize that jaguars may not be able to cross the highways and developed areas between the north and south of the country. Recent jaguar genetic work conducted in my lab has shown that at least 3 pairs of jaguars (parent-offspring or siblings) have come from the MPR and made it north to the Rio Bravo Conservation Area, which is continuous with protected areas in the Mexico. Therefore – the MPR and BRO lands, provide an important stepping stone in the biological corridor. Protecting this land from development and conversion to agriculture is important for maintaining connectivity for wildlife species including HCV species.

Finally – Belizean students from the University of Belize, Natural Resource Management Program, have indirectly benefited from the BRO lands. To date, my jaguar project has supported 7 undergraduate thesis students and interns while working on the jaguar project in the MPR and BRO lands. Since I plan to continue monitoring jaguars over the entire MPR, I will continue to have Belizean student interns and thesis students. BRO has always granted me permission to use their lands for the surveys and will continue to do so in the future. Therefore Belizean students will continue to obtain training in wildlife monitoring and I suspect may eventually be employed by BRO in the future, as BRO's wildlife monitoring plan develops under this CCB proposal.

I am very happy to see this project go up for validation, especially with the wildlife monitoring component, and would be happy to offer more thoughts should that be necessary. Please feel free to contact me for further information.

Comment 8

Date: 23 February 2011

Sent by: Peter Guenther, General Manager, Bull Run Overseas Ltd.

As the general manager of Bull Run Overseas L.T.D. I compliment Mr. Verl Emrick and his team for the well organized job they have done so far on the CCB project here on the farm. From the beginning till now they have precisely, carefully and with great respect to the property and staff done their job on the field as well as the paper work. It's been a pleasure to have them around!

I have noticed how B. R. O. staff already picked up good ideas from the CCB team that they have put into practice. I know this is just the beginning of the many things that lies in store for our clever staff. They have enjoyed working with the team.

Thanks to Mr. and Mrs. George Headley, owner and managing directors of the company, that employed me almost a year ago. We, my wife, our four children and I live here on the farm enjoying a healthy environment of clean, highly oxygenated air, as well as the undisturbed home of many species of birds and different animals that run freely in the gorgeous jungle where the peaceful rivers never run dry.

Belize is a small country but has a lot of knowledgeable hard working people. But with the bad economy in the last few years I have noticed the increase of unemployed Belizeans. But now with this CCB project taking place we hope to improve the lives of our staff as well as hiring and train more people. I can see that it could benefit a lot of families that now hardly survive.

Our goal is to keep improving the forest for a better Community and Biodiversity Standards.

Comment 9

Date: 23 February 2011

Sent by: Jose Galves, Staff member, Bull Run Overseas Ltd.

This project is very important because it will have many positive impacts on the environment and also the personnel. Global warming is no myth. Over the years the summers have reached tremendous temperatures and since our country has vast carbon pools it is reasonable for use to protect these resources.

The project zone is a very crucial part of the water system due to many rivers being born up there in the mountains.

The staff will get new and modern equipment to help them combat fire, gain a great wealth of knowledge of how human impacts can help and destroy an ecosystem if not done correctly.

Comment 10

Date: 23 February 2011

Sent by: Ananias Tzib, Staff member, Bull Run Overseas Ltd.

I Ananias Tzib is here by to do my comment about the project.

I am happy about this project that Bull Run Overseas is doing because we the workers have learn some of the work that they have been teaching us. And I hope we can learn more about the work. I appreciate what Mr. George & Mrs. Melina are thinking about us the workers.

I think that everything that Mr. Verl and his crew taught us on the work shop seems to be very good. Thanks for everything. For all of you the management of Bull Run.

Comment 11

Date: 23 February 2011

Sent by: Tulio Mast, Foreman, Bull Run Overseas Ltd.

The Mountain Pine Ridge is a very important part of our country for our ecosystem, as it produces many ecotypes ranging from pine tress to broad leaf forest. With the rapid changing of climate it is important to preserve our forest. One way we could do this is by thinning the pine trees, so as to give the others enough breathing space to expand and control some of the pollution, and we could have a cleaner environment. cleaner atmosphere.

It's a very good initiative on the part of environment to list who have shown interest in Belize ecosystem, as this would provide jobs for our Belizeans and enhance our tourism industry.

So whatever help or monies that is contributed to this project is very much worth the while and would be put to good use for the people and country of Belize.

Comment 12

Date: 17 February 2011

Sent by: Patrick Greene, Training Wing Warrant Officer, BATSUB

Forest management is an important carbon mitigation strategy for developing countries. The response of species to changing environments is likely to be determined largely by population responses. By educating and doing something now we will be able to pass on our environmental experience to our children. Stopping and indeed limiting emissions and off setting those costs will limit the damage. These projects are an important step in halting the damage already inflicted on the planet and by working together we can combat these. British Army Training Support Unit Belize (BATSUB) works closely with other stakeholders to ensure that any damage to the landscape is limited.
