

April 28, 2014

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

**RE: Comments on the Proposed First Update to the Climate Change Scoping Plan:
REDD should not be considered for California's cap and trade program**

Dear California Air Resources Board:

Thank you for the opportunity to provide comments on the Proposed First Update to the Climate Change Scoping Plan released February 2014. It is impressive to see in one document the long and varied list of regulations and programs California has adopted that support emissions reductions in the state, and the state's plans to deepen those efforts going forward.

While we strongly support the overall goals and the implementation plan of AB32, we remain concerned that the use of offsets detracts from the overall objective of reducing emissions, and results in a diverse array of perverse impacts. We do not believe that offsets are a just, equitable, or rational approach to reducing emissions. Our comments below focus on the possible inclusion of REDD-offsets within California's cap and trade program, as referred to in the draft scoping plan (pg. 95 and pg. 140). We strongly urge ARB not to consider an international REDD program, for the following reasons:

1. **Internationally funded conservation programs, including recent REDD pilot projects, have been implemented under conditions with high risk of undermining livelihoods and causing direct harm to local communities.** We believe that the risk of inadvertent harm to local communities that have so often resulted from international conservation efforts are not risks that ARB can or should take.
2. **A credited REDD program will not meet the requirements of AB 32 that all tradable credits must be additional** to what would have happened without the program because of large annual variations and uncertainties in business-as-usual deforestation rates.

The scoping plan states that the cap and trade program is in place to price greenhouse gas emissions and send "a clear signal that investment in clean, low carbon technologies will pay off" (page ES-3). However, at present the price signal caused by the cap and trade program is predicted to be too weak to incentivize much reduction under the cap. Instead, California's cap and trade program is expected to function mainly as an offsets and resource shuffling program.¹ We suggest that ARB allow the cap and trade program to send a price signal that will incentivize reductions under the cap in the state's residential, commercial and industrial sectors, rather than asking California businesses to pay for questionable and potentially harmful reductions internationally.

¹ Borenstein, S., J. Bushnell, F. A. Wolak & M. Zaragoza-Watkins. 2014. Expecting the Unexpected: Emissions Uncertainty and Environmental Market Design. Work performed for the California Air Resources Board.

California can best support tropical forest conservation through addressing ways in which California's procurement policies and California-based industries drive tropical deforestation through commodity supply chains in the purchasing of goods such as palm oil, soy, beef, timber, and petroleum. Considering that California's cap and trade program is expected to be oversupplied through 2020^{2,3} and amendments made to the cap and trade program adopted April 25, 2014 include a new cost-containment mechanism that prevents allowance prices from exceeding the top Allowance Price Containing Reserve level in the unlikely case that that prices should rise that high, ARB has time to fully consider the risks discussed herein and consider alternatives before rushing into the development of a REDD program.

Credited REDD is not an effective way to support forest conservation, and involves high risk of unintended harm to local communities.

Internationally funded conservation efforts over the past four decades are filled with well-intentioned projects that resulted in land confiscation, local communities being barred from their traditional, non-harmful use of the forest, and in many cases, increases rather than decreases in illegal deforestation. It is well understood that conservation programs needs to be carefully designed and carried out in a bottom-up manner that involves communities living in, and depending on, the forests, taking into account their particular livelihood needs and particular local drivers of deforestation.⁴ A market-based approach focused on carbon is very much the opposite of what researchers and practitioners have deemed effective. A recent study by Rights and Resources Initiative concludes that “the complex financial mechanisms needed to implement REDD+ programs tend to create opaque conditions, promote a lack of transparency, and impose high participation and transaction costs on those who can least afford them.”⁵

Historical precedent in many jurisdictions, including those being considered by ARB, makes clear that that such conditions not only undermine the livelihood benefits that REDD programs may confer to local communities,⁶ but may lead to persistent tensions and open conflict between implementing agencies and local communities, with attendant reputational damage and material costs to the project and its agents, and may similarly undermine the implementation of the project at the local level (see numerous examples cited below). The financial and derivatives experts at the Munden Project⁷ have stated, “The problem for REDD is that the commodity-based approach is at loggerheads with the development benefits REDD is expected to generate.”⁸ The Munden Project further states that “the bulk of benefits from forest carbon will not go to REDD projects, the

² Ibid.

³ Point Carbon. 2013. Carbon Market Analyst: New California Emissions Model and Revised WCI Price Forecast. San Francisco.

⁴ Among other sources, see Center for International Forestry Research. Community managed forests and forest protected areas: An assessment of their conservation effectiveness across the tropics.2012 at: <http://www.cifor.org/online-library/browse/view-publication/publication/3461.html>

⁵ Rights and Resources Initiative. Status of Forest Carbon Rights and Implications for Communities.2014 at: http://www.rightsandresources.org/documents/files/doc_6594.pdf?utm_source=Carbon+Brief+Launch+Email&utm_campaign=Carbon+Rights&utm_medium=email

⁶ Paladino S (2011). Tracking the fault lines of pro-poor carbon forestry. Culture, Agriculture, Food and Environment (2011): 128; Osborne T (2011). Carbon forestry and agrarian change: access and land control in a Mexican rainforest. Journal of Peasant Studies Volume 38, Issue 4.

⁷ The Munden Project. “REDD and Forest Carbon: Market-Based Critique and Recommendations”. 2011

⁸ The Munden Project. 2011.OpCit.7

communities that live within them or the countries where they are located.”⁹ Our concern is that the imposition of a REDD program that provides benefits, in the form of carbon credits, to California industry, while failing to consider the needs of the forest-dependent communities in partner jurisdictions, will tarnish the efforts of California with undesirable and intractable perverse results.

Land ownership and use is highly contested in many regions of the world, and unclear land title itself is a leading driver of deforestation. The aforementioned research by Rights and Resources Initiative concludes that, in the absence of comprehensive legal tenure reform, REDD programs could “perpetuate and amplify existing conflicts” and “lead to reversals in the gains that communities have made securing their rights over several decades”¹⁰ by impinging upon existing statutory and customary rights.

Nowhere is this more true than in the tropical forest regions of Chiapas Mexico, where government efforts to institute land tenure and use regulations have dragged on for over 40 years and proceeded piecemeal according to highly paternalistic relationships between officials and individual communities.¹¹ The 1994 indigenous Zapatista uprising can be traced directly to this troubled history,¹² and resulted in an escalation of conflict in the region that has proven resistant to government attempts at resolution, whether, military, economic, or political.¹³ Initial attempts to institute a REDD program in Chiapas, albeit without the robust protocols that the state of California plans to develop, resulted in the exacerbation of this long-standing land-tenure conflict, and to date has not been resolved by the Chiapas administration.^{14,15,16} We have annexed to this submission a record of ongoing land claims in one forested region of Chiapas, as illustration of our broader concern that land tenure and forest governance in Chiapas, and potentially in other partner jurisdictions, are not sufficiently stable to support the successful implementation of a REDD project by the Chiapas administration. We therefore urge ARB to refrain from creating financial incentives that could be used for perverse political purposes, and which carry a high risk of undermining the resource rights, land rights, and sovereignty of those whose livelihoods depend directly on the natural resource base.

The dynamics of deforestation and forest degradation are multiple and highly complex. These “drivers” operate at a number of levels, influenced by the global economy, regional trade, national politics and economy, as well as local land markets, power dynamics, subsistence forest

⁹ The Munden Project. 2011. OpCit.10

¹⁰ Rights and Resources Initiative. OpCit

¹¹ Ascencio Franco, Gabriel, “Regularización de la propiedad en la Selva Lacandona: cuento de nunca acabar” Tuxtla Gutiérrez, Universidad de Ciencias Artes de Chiapas, 2008.

¹² De Vos, J. 2002. Op Cit.

¹³ Harvey, Neil. 1998. OpCit. Villafuerte Solís, D. et al. 1999. OpCit. Womack, John. 1999. OpCit.

¹³ LEGORRETA DÍAZ, Ma. del Carmen, 1998, Religión, Política y Guerrilla en Las Cañadas de la Selva Lacandona, Edit. Cal y Arena, México

¹⁴ See video testimonial: <http://www.youtube.com/watch?v=v6DAb6Y0Ji0>; <http://www.redd-monitor.org/2011/04/07/redd-alert-in-chiapas-mexico/>; <http://www.redd-monitor.org/2011/09/07/statement-from-chiapas-mexico-redd-project-is-a-climate-mask-to-cover-up-the-dispossession-of-the-biodiversity-of-the-peoples/>

¹⁵ Conant J (2011). Do Trees Grow on Money? Earth Island Journal.

http://www.earthisland.org/journal/index.php/eij/article/do_trees_grow_on_money

¹⁶ Pobladores de la Selva Lacandona denuncian que el gobierno les pretende arrebatar su tierra. March 11, 2014. El Proceso. V.1956. http://www.proceso.com.mx/?p=366947&utm_source=hoy+en+dh&utm_campaign=8cfd721667-Monitoreo_del_30_de_agosto_de_20134_1_2013&utm_medium=email&utm_term=0_58473853f8-8cfd721667-51642609 Last accessed 4.28.2014.

dependencies, population and poverty.¹⁷ Addressing these drivers appropriately and at scale requires a broad and integrated approach that includes reducing demand for wood and agricultural commodities, reducing demand for land, supporting cultural values, indigenous territories, and community conserved areas, redirecting financial flows, addressing lack of political will and capacity, and integrating forest governance and poverty reduction strategies.¹⁸ The concern that REDD programs may fail to address these comprehensive drivers may be best illustrated by the fact that since 2010 when Norway established a \$1 billion bilateral REDD agreement with Indonesia, some promising reforms have occurred but the rate of deforestation in Indonesia has doubled.¹⁹

Experience so far with pilot REDD projects has demonstrated that these risks are real, and likely, including land grabbing, involuntary displacement, restricting people from traditional use of land, and in some cases increased risk of illegal deforestation. Notable examples include:

- A UNEP-funded REDD+ project in Kenya's Mau Forest, where members of the Ogiek People have suffered violent evictions.²⁰
- The Central Kalimantan Forest Project, a US\$43 million REDD project in Indonesia that was cancelled in 2013 and which "produced no significant environmental outcomes, and created conflict in local communities and confusion about the status of their land."²¹
- The Purus Project, a REDD initiative in Acre, Brazil which classified the forest-dependent families living in the project area as "deforestation agents" and imposed restrictions on their traditional practices that gave rise to a confrontation that has yet to be resolved.²²
- The Rufiji Delta REDD pilot project in Tanzania that involves plans understood to lead to the eviction of thousands of people who have lived in, and protected, the mangrove forest in the delta for centuries.²³

Carefully designed fund-based approaches supporting local conservation efforts, as well as approaches built on reducing the direct drivers of deforestation in commodity supply chains, are much more likely to be effective, while avoiding the high risk of negative unintended consequences associated with a credited REDD program.

A credited REDD program will not meet the additionality requirements of AB 32

Given large uncertainties in business-as-usual deforestation rates, and large annual variation in those rates, it is not feasible to set a crediting baseline that effectively supports reductions in deforestation while also avoiding non-additional crediting. For a conservation program to effectively reduce deforestation, sufficient funds must be provided in a predictable manner. For a credited REDD program, this would require defining a crediting baseline lax enough so that it can predictably be met and exceeded with program efforts. However, to avoid non-additional crediting

¹⁷Poffenberger, Mark, Ph.D. *Forests and Climate Change: Mitigating Drivers of Deforestation*. 2009

http://www.communityforestryinternational.org/publications/working_papers/Drivers_of_Deforestation.pdf

¹⁸ Global Forest Coalition. "Getting to the Roots: Underlying Causes of Deforestation and Forest Degradation, and Drivers of Forest Restoration". 2012

¹⁹ <http://www.sciencemag.org/content/342/6160/850>

²⁰ <http://www.redd-monitor.org/2009/11/19/ogiek-threatened-with- eviction-from-mau-forest-kenya/>

²¹ <http://www.redd-monitor.org/2013/07/04/australia-shuts-down-the-kalimantan-forest-carbon-partnership-a-lot-of-funds-spent-and-very-little-progress/>

²² http://wrm.org.uy/wp-content/uploads/2013/11/Observations_on_a_private_REDD_project_in_Acre.pdf

²³ Beymer-Farris, B. A., & Bassett, T. J. (2012). The REDD menace: Resurgent protectionism in Tanzania's mangrove forests. *Global Environmental Change*, 22(2), 332-341.

the crediting baseline must be set low enough to avoid crediting reductions in deforestation rates that would have happened because of factors outside of the REDD program. Meeting these two requirements simultaneously is a challenge because of the substantial variability in annual deforestation rates in jurisdictions around the world as well as uncertainties in future business-as-usual projections.

For example, deforestation rates in Acre, Brazil varied between 167 and 1208 square kilometers per year between 1988 in 2009, with peaks and dips throughout that period.²⁴ The REDD Offsets Working group (ROW)²⁵ recommends a 10-year average of the jurisdiction's deforestation rate during years prior to the start of the REDD program be used as the baseline deforestation rate. It is possible to examine the non-additional crediting that would result from this method due to business-as-usual variation in annual deforestation rates by applying this method to the past and calculating the credits that would have been generated in subsequent years. All such credits would be non-additional, since they would all be from variation in deforestation rates that happened without the offset program. This method of baseline setting, if it were applied to Acre, Brazil in 1997, 2002, and 2007, would generate annual average non-additional credits of 9, 14 and 16 MT CO₂e respectively per year for subsequent years through 2009.²⁶ Other states in Brazil have similar variation in their annual deforestation rates.²⁷ In order for California to only credit those reductions caused by its REDD program, it would need to set a crediting baseline at a level that is 30% of the average deforestation rate between 1998 and 2007 (the value of the deforestation rate in 2009, the lowest deforestation rate between 1999 and 2009). Such a level would not provide a predictable funding source for Acre. A credited REDD program will always require a trade off between setting a crediting baseline high enough to predictably and sufficiently support reductions in deforestation, and setting a crediting baseline low enough to meet the requirement that all credits be additional. Past deforestation rates in Brazil indicates that it is not possible to meet both requirements once.

The difficulty in setting a crediting baseline that mostly only credits the results of the program was evidenced by the answers of Monica Julissa, Director of the Institute of Climate Change of Acre, Brazil, during the second workshop of the REDD Offsets Working group that took place at Stanford University on February 5, 2013. When asked if Acre, Brazil had plans to continue to reduce its deforestation rates into the future, Ms. Julissa responded that programs that the state already has in place are expected to continue to reduce the state's deforestation rate. These programs include "zoning," policies that "promote the economy based on the forest... by substituting the cattle rancher [with] the forest, and try to promote forest products..." and their obligation to "be in compliance with the federal policies."²⁸ But she continued that Acre needs new funds to continue and expand their deforestation reduction efforts. While a crediting program can certainly have an influence on deforestation rates in Acre, Brazil, it would be impossible to accurately and reliably distinguish the effects of Acre's ongoing programs and other factors affecting deforestation rates from the effect of the crediting program. Ms. Julissa's statements describe the

²⁴ http://www.mongabay.com/brazil-state_deforestation.html (accessed April 27, 2014)

²⁵ citation and web page

²⁶ Deforestation rates taken from: http://www.mongabay.com/brazil-state_deforestation.html; 43,700 tCO₂e per km² is calculated from FAO. 2011. The State of Forests in the Amazon Basin, Congo Basin and Southeast Asia. A report prepared for the Summit of the Three Rainforest Basins Brazzaville, Republic of Congo, 31 May–3 June. (Table 8)

²⁷ http://www.mongabay.com/brazil-state_deforestation.html (accessed April 27, 2014)

²⁸ <http://greentechleadership.org/events/workshops/row-mrv-workshop/#slides> (accessed April 27, 2014) (video #1, timestamp 2:08-2:14)

difficulty involved with determining a crediting baseline and attributing an amount of emissions reductions to a REDD program in a way that preserves the additionality of the resulting credits and meets the requirements of AB 32.

Conclusion

ARB should not rush the development of a REDD program or the inclusion of REDD credits in the cap and trade program until it has undertaken sufficient analysis and consideration of these risks, in concert with legitimate actors in partner jurisdictions. We question whether ARB is in a position to invest the time and attention needed to fund international conservation programs as needed to reasonably ensure avoidance of negative impacts on local communities. We also question the ability for a credited REDD program to be designed in a way that meets the additionality requirements of any traded credits under the cap and trade program. We do not see how it is possible to define a crediting baseline that both provides a predictable, effective amount of funds and avoids non-additional crediting. Further, through 2020, new credits generated from a REDD program will most likely contribute to an over-supply of credits, and are thus are not only non-essential to the program, but could weaken the program with greater over-supply. We strongly suggest that ARB choose not take the risks associated with adopting a REDD program. We recommend that ARB allow the cap and trade program to send a price signal that will incentivize reductions under the cap, rather than asking California businesses to pay for questionable and potentially harmful reductions internationally. We also recommend that if ARB is interested in supporting tropical forest conservation in other sub-national jurisdictions, ARB should consider addressing ways in which California's procurement policies and California-based industries drive tropical deforestation through commodity supply chains in the purchasing of goods such as palm oil, soy, beef, timber, and petroleum.

Most sincerely,

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Annex 1: The State of 'Irregular' Indigenous Communities in the Lacandon Jungle of Chiapas²⁹

The social and political landscape of the Lacandon region of Chiapas is extremely complex and marked by a long history of conflict.³⁰ In the 1960's the Mexican government encouraged landless farmers to colonize the Lacandon.³¹ Colonization offered a momentary path-of-least-resistance that preserved large-landholding estates in other parts of Chiapas. However, authorities provided almost no resources or guidance to the primarily indigenous colonists, and the process resulted in abundant tenure ambiguity and conflict.³² Government efforts to rationalize land tenure and use regulations have dragged on for over 40 years and proceeded piecemeal according to clientistic relationships between officials and individual communities.³³

The 1994 indigenous Zapatista uprising can be traced directly to this troubled history³⁴, and resulted in an escalation of conflict in the region that has proven resistant to government attempts at resolution, whether, military, economic, or political.³⁵ This phase of the land conflict in Chiapas also brought an influx of new and varied actors into the Lacandon region: international development initiatives, anti-globalization solidarity groups, an enormous number of national and international NGO's, and government social development programs deployed with the intention of luring residents away from the Zapatista resistance.³⁶ To this day, an array of competing interests vie for productive resources amidst social fragmentation and scarcity of services such as schools, healthcare, and access to markets.³⁷

Through a series of government decrees beginning in 1978, seven Natural Protected Areas were established to protect the areas of the Lacandon that hold the greatest biodiversity in Mesoamerica.³⁸ These protected areas were declared with almost no consultation with affected indigenous residents and served to deepen existing land tenure and access conflicts.³⁹ In 2000, at the urging of national and international conservation organizations state and federal government initiated an explicit policy of removing communities without formal land title.⁴⁰ Deemed irregular or illegal, indigenous communities were removed from land on protected areas that they had inhabited

²⁹ Research compiled by Friends of the Earth-US; for further information, contact: jconant@foe.org

³⁰Harvey, Neil. *The Chiapas Rebellion: The Struggle for Land and Democracy*. Durham, NC: Duke University Press, 1998. Villafuerte Solís, D. et al. "La tierra en Chiapas, viejos problemas nuevos." Plaza y Valdés, Universidad de Ciencias y Artes del Estado de Chiapas, México, 1999. Womack, John. *Rebellion in Chiapas: An Historical Reader*. New York: New Press, 1999.

³¹ De Vos, J. "Una tierra para sembrar sueños: historia reciente de la selva Lacandona, 1950-2000." México, D.F.: Centro de Investigaciones y Estudios Superiores en Antropología Social, 2002.

³²Legorreta Diaz, Ma. del Carmen, "Religión, Política y Guerrilla en Las Cañadas de la Selva Lacandona", Edit. Cal y Arena, México, 1998.

³³ Ascencio Franco, Gabriel, "Regularización de la propiedad en la Selva Lacandona: cuento de nunca acabar" Tuxtla Gutiérrez, Universidad de Ciencias Artes de Chiapas, 2008.

³⁴ De Vos, J. 2002. Op Cit.

³⁵ Harvey, Neil. 1998. OpCit. Villafuerte Solís, D. et al. 1999. OpCit. Womack, John..1999. OpCit.

³⁶Legorreta Diaz, Ma. del Carmen, "Religión, Política y

³⁷ Ronfeldt, David, John Arquilla, Graham Fuller and Melissa Fuller. *The Zapatista "Social Netwar" in Mexico*. Santa Monica, CA: RAND Corporation, 1998. http://www.rand.org/pubs/monograph_reports/MR994.

³⁸ Howard, Philip; "The History of Ecological Marginalization in Chiapas" 1998. *Environmental History* Vol 3 No. 3 Jul 1998. Sanchez Perez, Hector Javier. "Excluded People, Eroded Communities: Realizing the Right to Health in Chiapas, Mexico." *Physicians for Human Rights, El Colegio de la Frontera Sur*. 2006

³⁹ Mendoza, E. and R. Dirzo. 1999. Deforestation in Lacandonia (southeast Mexico): evidence for the declaration of the northernmost tropical hotspot. *Biodiversity and Conservation* 8:1621-1641.

⁴⁰ Durand et al. "Inclusion and exclusion in participatory strategies in the Montes Azules Biosphere Reserve, Chiapas, Mexico." *Conservation and Society*, Accepted for Publication 2013

⁴⁰ Cortez, Carlos, and Luisa Paré. "Conflicting rights, environmental agendas and the challenge of accountability: Social mobilization and protected natural areas in Mexico." In *Rights, Resources and the Politics of Accountability*, ed. P. Newell and J. Wheeler Zed: 2006.

often for generations; government relocation policy provoked widespread resentment and the interpretation that environmental actors are collaborating with military counter-insurgency efforts.⁴¹ Former UN Special Rapporteur on the Rights of Indigenous Peoples, Rodolfo Stavenhagen, visited the “irregular” communities in Montes Azules during his 2003 visit to Mexico. In testimony before the UN High Commission for Human Rights he advocated explicitly for the rights of Montes Azules communities to stay where they are.⁴² In a follow-up 2007 report Stavenhagen criticized the Mexican agrarian and environmental judiciary calling them “obsolete,” and “incapable of recognizing and integrating indigenous rights.”⁴³

The chart below, drawn from official Chiapas and federal government documents, details the communities targeted for eviction in 2009 and illustrates the logic behind government eviction policy.⁴⁴

<i>Village Name</i>	<i>Affiliation</i>	<i># of Resident Families</i>	<i>Size of Territorial Claim (hectares)</i>	<i>Government Action Plan</i>	<i>Current Status</i>
Nuevo Agua Dulce	Zapatista /EZLN	10	150	Negotiated Exit, Requires Strengthening Negotiation Channels	No Change from 2009
Nuevo Limar	Zapatista /EZLN	48	450	Negotiated Exit, Requires Strengthening Negotiation Channels	No Change from 2009
Nuevo San Gregorio	ARIC-ID	23	1,977	Requires Renewed Attempt at Negotiation, Foresee Criminal Action	Threatened with Immediate Forced Eviction March 2012
Nuevo Villaflores	None	12	235	Negotiated Exit, Must Attend to Community's Existing Proposal and Incorporate it into Gov't Plan	Accepted Indemnification, Awaiting Payment
Ojo de Agua la Pimienta	ARIC-ID	20	50	Negotiated Exit, Requires Strengthening Negotiation Channels	No Change from 2009
Ranchería Corozal	ARIC-ID	13	515	Requires Renewed Attempt at Negotiation, Foresee Criminal Action	Threatened with Immediate Forced Eviction March 2012
Salvador Allende	ARIC-ID	23	800	Case in Process	Threatened with Immediate Forced Eviction March 2012

⁴¹ Castro Soto, Gustavo. “El Pukuj Anda Suelto en Montes Azules: Biopiratería y Privatización de la Vida,” San Cristobal de las Casas, Chiapas. 29 Abril 2004.

⁴² E/CN.4/2004/80/Add.2; 23 de diciembre de 2003

⁴³ A/HRC/4/32; 27 de febrero de 2007

⁴⁴ Secretaría de Medio Ambiente y Vivienda, Gobierno de Chiapas, “Atención a Grupos Irregulares dentro de la Reserva de la Biosfera Montes Azules y Comunidad Zona Lacandona.” Official Powerpoint: September 26 2009. Secretaría de la Reforma Agraria, Gobierno Federal de los Estados Unidos Mexicanos, “Programa de Atención Integral Bienes Comunales Zona Lacandona Reserva de la Biosfera Montes Azules: La Disputa por la Tenencia de la Tierra en la Selva Lacandona.” Official Powerpoint: February 2006.

El Innominado ó San Pedro	Zapatista /EZLN	3	150	Case in Process, Foresee Criminal Action against 3 families who refuse to leave	Forcibly Evicted Feb 2010
Nuevo Altamirano	Zapatista /EZLN	25	1,647	Negotiated Exit, Must Attend to Community's Existing Proposal and Incorporate it into Gov't Plan	No Change from 2009
Benito Juárez Miramar	ARIC-ID	40	4,553	Regularize Land Title, Attend to Proposal and required paperwork	No Change from 2009
Seis de Octubre	Zapatista /EZLN	50	1,016	Negotiated Exit, Requires Strengthening Negotiation Channels	No Change from 2009
Chumcerro la Laguna	ARIC-ID	15	1,750	Regularize Land Title, Attend to Proposal and required paperwork	No Change from 2009
TOTAL		282	13,293		
		Families	Hectares		