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To Whom it May Concern:

Greetings. I’m a twenty six year old person living in Los Angeles, an epicenter of air thick with air pollution, home to the largest urban oil field in the nation. I write to you today to urge you not to approve the CTFS. Purchasing carbon offsets makes no sense when we’ve reached a critical point in which our planet, atmosphere, and ecosystems cannot sustain current emissions let alone any more. We shouldn’t be gambling our collective future by trying out CTFS, which doesn’t account for the deforestation caused by the lumber industry and might incentivize more palm oil production. Have you seen footage and pictures of the massacre of orangutans and other sentient beings from deforestation by the palm oil industry? It’s total genocide of sentient beings and it’s ecocide. Approving CTFS is irresponsible, unethical, and unsafe! We must reduce emissions by reducing emissions and shifting our consumptions and decreasing extraction and mass consumption- not by buying and trading emissions for experimental pursuits.

The CTFS does not ensure that forests are actually protected. Carbon credit projects often include extensive logging. Disturbance from natural and human causes result in literally volatile changes in forest conditions. Often times REDD projects do not actually keep forests standing.

The CTFS does not ensure that greenhouse emissions are reduced. Offsets by their nature allow emissions to occur, in exchange for uncertain and ephemeral emissions management in another place and at another time.

The CTFS does not ensure harm is avoided. There is no safeguard against harm. At best California can withdraw participation after significant harm has taken place, become documented and survived the exhausting struggle to bring it to policy making. Human and land rights violations on the one hand and environmental racism on the other are both deeply embedded in the CTFS scheme.

The ARB intends the CTFS to be used by the global aviation industry for the dubious and unscientific CORSIA scheme for future "carbon neutral emissions growth." The CORSIA scheme has two mechanisms, carbon offsetting and aviation biofuels. By endorsing CTFS California runs the risk of instigating a spike in market demand for palm oil-based aviation biofuels, resulting in an increase in tropical deforestation.

The CTFS locks in market incentives that undermine global climate action that is proven more effective at protecting forests. The CTFS may ultimately amount to mere greenwash that protects polluters in California and forest destroying industry globally.

In California emissions from refineries and the oil and gas sector are actually going up. The evidence is building that the market mechanism is failing to bring real emissions down.

California still fails to provide greenhouse gas emissions data for the IPCC category of Forested Lands and Wood Products -- that is to say that California does not provide publicly available data on the emissions from industrial forestry logging activities like clearcutting, which impacts tens of thousands of acres of California forests every year.

The IPCC is clear that managing forests is not a "get-out-of-jail-free" card for ongoing extraction and burning of fossil fuels. Offsets do not get the necessary job done, there is no room for offsets if we are to achieve crucial temperature rise thresholds.

Aviation impacts and CTFS background available here:

<https://gcc01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.biofuelwatch.org.uk%2F2019%2Fcalifornia-letter-pr%2F&amp;data=02%7C01%7Ccotb%40arb.ca.gov%7C8a7d16fb16c740abc36408d72cdfe431%7C9de5aaee778840b1a438c0ccc98c87cc%7C0%7C0%7C637027212423028556&amp;sdata=%2B061L5wXc9YqAUTmVxAnxoqpz0sQZr3swAXm5jTJUMs%3D&amp;reserved=0>