



August 29, 2019

To the California Air Resources Board:

https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=tfs2019&comm_period=N

Re: Opposition to the proposed California Tropical Forest Standard

Greenaction for Health and Environmental Justice joins with environmental justice, climate justice, Indigenous organizations and others across California, the nation and beyond in urging the California Air Resources Board to reject the Tropical Forest Standard (TFS), which would lay the groundwork for accepting Reduced Emissions from Deforestation and Degradation (REDD) offset credits into California's carbon trading system.

As an organization founded by, and led by, grassroots leaders from frontline communities impacted by pollution, climate change and environmental racism and injustice, Greenaction urges California to become a true leader in addressing climate change and cease promotion of false solutions.

With the Amazon on fire, it is clearer than ever that preservation of tropical forests is critical for conserving biodiversity; providing homes, cultural resources and livelihoods for millions of people; and for protecting our climate. The TFS proposal was created as a preliminary step to allowing REDD offset credits into California's carbon trading system which would encourage polluters to avoid reducing emissions in the state. In California, offsets actually enable an increase in industrial emissions by a greater amount than otherwise allowed by AB32. This has significant health impacts for fenceline communities in California, the majority of whom are people of color who live near major greenhouse gas emitters. California must not adopt policies that will drive climate-related investments out of California, at the cost of continued emissions in our communities.

In addition, tropical forest carbon offsets pose unacceptably high risks of violating indigenous rights and human rights, and are impossible to police across national borders. California should not be encouraging them through the endorsement of the TFS.

As California EPA and CARB have made environmental justice part of your mission, we urge you to uphold environmental justice, protect the health of people and our planet, and reject the TFS and any attempts to accept REDD credits into California's carbon trading system. Instead, we encourage California to take true climate leadership by supporting alternatives to offsets, such as ending public procurement of tropical deforestation-linked commodities and reducing imports of those commodities into our market.

Sincerely,

Bradley Angel, Executive Director

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