

August 29, 2019

The Honorable Mary D. Nichols, Chair
California Air Resources Board
1001 I Street, Suite 2828
Sacramento, CA 95814

We, the undersigned California organizations and residents, urge the California Air Resources Board to reject consideration of 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.

Preservation of tropical forests is critical for conserving biodiversity; providing homes, cultural resources and livelihoods for millions of people; ensuring the survival and ways of life for many Indigenous Peoples, and for protecting our global climate. But the TFS proposed by the California Air Resources Board is deeply misguided and would undermine the integrity of California's climate policies.

Carbon offsets perpetuate pollution

The Tropical Forest Standard has been created as a preliminary step to allowing REDD offset credits into California's carbon trading system. Opening the floodgates to these offsets encourages polluters to avoid reducing their emissions here in the state. At best, offsets create *zero* emissions reductions. Under California's carbon trading system, they actually enable an increase in industrial emissions by a far 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 cannot afford to adopt policies that will drive climate-related investments outside of California, at the cost of continued emissions in our communities.

Tropical forest carbon offsets pose risks to indigenous and human rights

REDD projects have a well-known and recorded history of contributing to illegal actions, violence, forced decision-making, land grabs, and other human rights abuses for many indigenous groups and forest-dwelling people around the globe. REDD projects divide Indigenous Peoples and subject them to grossly disproportionate economic power, and intimidation and coercion. It is practically impossible for ARB to monitor international forest offset programs in foreign jurisdictions to prevent these abuses and ensure compliance with the TFS's human rights standards. Indeed, the proposal does not provide California with any additional oversight or mechanisms by which it can ensure those violations do not occur under the Tropical Forest Standard.

California should not validate a methodology that has repeatedly demonstrated failure

While many problems exist with offsets in general, there are significant issues unique to REDD projects that make them an inherently flawed and ineffective means of protecting tropical forests. Many of these problems are outlined, although not adequately addressed, in the TFS's environmental impact assessment, including the problems of permanence and non-additionality. Simply put, tropical forest carbon offsets allow *certain, permanent* harm (the emission of more GHGs from industrial sources) in exchange for hoped-for *uncertain, temporary* carbon sequestration. Because these problems are so intractable, no jurisdiction in the world accepts REDD credits into its compliance market. Adopting the TFS would harm California's international credibility and delay meaningful action to actually protect tropical forests. Were California ever to allow REDD carbon offset credits to enter its cap and trade

system, it would undermine the integrity of our climate policy and violate AB 32's requirement that all emissions reductions be "real, additional, quantifiable, permanent, verifiable and enforceable".

Because of the reasons stated above, we strongly urge the ARB to reject consideration of the Tropical Forest Standard (TFS), and any attempts to accept Reduced Emissions from Deforestation and Degradation (REDD) credits into California's carbon trading system. Instead, we encourage California to take true climate leadership by piloting alternatives to offsets, such as ending public procurement of tropical deforestation-linked commodities and reducing imports of those commodities into our market.

Sincerely,

350 Bay Area
350 Conejo / San Fernando Valley
Amazon Watch
Asia Pacific Environmental Network
Bay Area Coalition for Headwaters
Biofuelwatch
California Communities Against Toxics
California Environmental Justice Coalition (over 70 groups)
California Safe Schools
Central California Asthma Collaborative
California Environmental Justice Alliance
Center for Biological Diversity
Central California Environmental Justice Network
Chinese Progressive Association, San Francisco
Clean Water Action
Climate Hawks Vote
Climate Justice Alliance
Coalition for Clean Air
Community Food and Justice Coalition
Del Amo Action Committee
Environmental Protection Information Center
Filipino American Coalition for Environmental Solidarity
Food & Water Watch
Food Empowerment Project
Friends of the Earth
Global Justice Ecology Project
Grassroots International
Greenaction for Health and Environmental Justice
Greenpeace
Indigenous Environmental Network
International Campaign for Responsible Technology
International Indian Treaty Council
Just Transition Alliance
Lost Coast League
Oakland Climate Action Coalition
Oakland Institute
Physicians for Social Responsibility- Los Angeles

PODER (People Organizing to Demand Environmental & Economic Rights)
Rainforest Action Network
SanDiego350
Sequoia ForestKeeper
Service Employees International Union West
Shawnee Forest Defense!
SoCal 350 Climate Action
Sunflower Alliance
West Berkeley Alliance for Clean Air and Safe Jobs
Women's Earth and Climate Action Network
Valley Improvement Projects

Individuals (affiliation listed for identification purposes)

Katie Loncke, Buddhist Peace Fellowship
Kris Chan, Chinatown Community for Equitable Development
Jason Li, Chinatown Community for Equitable Development
Karen Law, Chinatown Community for Equitable Development
Tiffany Do, Chinatown Community for Equitable Development
Lorna Xu, Chinatown Community for Equitable Development
Michael Wong, Chinatown Community for Equitable Development
Sophat Phea, Chinatown Community for Equitable Development
Frances Huyhn, Chinatown Community for Equitable Development
King Cheung, Chinatown Community for Equitable Development
Maricela Mares-Alatorre, El Pueblo Para el Aire y Agua Limpia de Kettleman City
John Mataka, President, Grayson Neighborhood Council
Kana Kobayashi, Nikkei Resisters
Yumi Kobayashi, Nikkei Resisters
Don Misumi, Nikkei Resisters
Miya Summers, Nikkei Resisters
Joseph Tsuboi, Nikkei Resisters
June Brashares
Shannon L Griffin
Susan Heath
Humberto Lugo
Brenda Jo McManama
Cynthia Mellon
Shiila Safer
Mari Rose Taruc
Erica Taylor
Craig Wong

