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**To:** [ARB Clerk of the Board](#)  
**Subject:** Reject Tropical Forest Standard  
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August 29, 2019

Mary Nichols  
Chair, California Air Resources Board

The Climate Justice Alliance is a growing alliance of 70 urban and rural frontline communities, organizations and supporting networks in the climate justice movement.

We strongly 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 and because such forests are homes, cultural resources, and livelihoods for millions of people. Forests are essential for protecting our global climate.

Tropical forest carbon offsets pose risks to the survival and the human rights Indigenous peoples. REDD projects have a recorded history of contributing to illegal actions, violence, forced decision-making, land grabs, and other human rights abuses for Indigenous communities and other forest-dwelling peoples around the globe. REDD projects are divisive of Indigenous peoples, and subject them to disproportionate economic power, as well as intimidation and coercion. It is not possible for the ARB to monitor international forest offset programs in foreign jurisdictions to prevent such abuses and ensure compliance with the TFS human rights standards. This proposal does not provide for additional oversight or mechanisms to ensure that violations do not occur under the TFS.

The TFS has been created as a preliminary step to allow REDD offset credits into California's carbon trading system. Having access to offsets of this type will not encourage polluters to reduce emission. On the contrary, it will allow them to increase emissions, and will inevitably result in significant health impacts for fenceline communities in California, the majority of whom are People of Color living near major greenhouse gas emitters.

California should not validate a methodology that has repeatedly demonstrated failure. Tropical forest carbon offsets permit certain, permanent harm (the emission of GHGs from industrial sources) in exchange for uncertain, temporary carbon sequestration. Adopting the

TFS would harm California's international credibility and delay meaningful action to truly protect tropical forests.

We urge the ARB to reject consideration of the Tropical Forest Standard (TFS) and any attempt to accept REDD credits into California's carbon trading system.

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