



COLLEGE OF NATURAL RESOURCES
ENVIRONMENTAL SCIENCE, POLICY, AND MANAGEMENT
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Re: CARB's Draft Tropical Forest Standard 2018

To Jason Gray and CARB Members,

Forests are critical in the fight against climate change; tropical forest offsets, unfortunately, are not. In addition to failing to make a dent in the climate crisis, this program would have the strong potential to undermine vulnerable communities and damage California's reputation as a leader in climate change and environmental justice, all while leaking large sums of money to conduct expensive studies that will say what we want to hear, whether reflecting realities on the ground or not.

I have been studying forest carbon offset programs in Colombia for the last four years as a PhD candidate within UC Berkeley's Environmental Science, Policy, and Management program. I know from my work that every village is different in how these efforts land there, the effects they have on the communities, and the changes they produce – or don't produce – in forest management. This is because governance, social relations, histories of forest and resource use, and interactions with the outside world are different in each village, and change with time. I have also seen firsthand that safeguards and standards applied from 10,000 ft (i.e. Sacramento), comprehensive and well-considered as they may be, are not up to the task of handling this ground-level variation.

These efforts, then, are essentially a form of expensive gambling – California is betting that these jurisdictional governments are going to be able and willing to crack down on deforestation, and to do so in a way that does not harm the most vulnerable, but that instead goes after the most powerful...i.e., those generally most able to convince politicians to support them, or most likely to threaten and harm politicians who ignore them. Examples from around the world suggest, however, that even when leaders state that cracking down on deforestation is a priority, and are given the funds to take action, they are rarely capable of following through – limited by the minimal state presence in these forest areas, and networks of influential actors that convince it not to act. There are those who argue that we have not yet fully given REDD+ a chance, but I believe these same challenges will persist even under increased funding and tight jurisdictional programs.

In the communities in which I have worked, REDD+ has brought no change on the ground in terms of forest use – degrading selective tree harvesting continues apace, and there are no new governance or livelihood benefits to show – but now seems likely to generate carbon credits, thanks to the methodology that was used. This strikes me as odd and wasteful, to spend millions of dollars on studies and plans to meaningfully change nothing, and have companies buying credits to "offset" their emissions, but that in reality mean nothing. Such is the slippery concept of additionality in REDD+ that such creation of hot air carbon credits is not uncommon, despite the pretty stories that project proponents might paint.

This is also likely under jurisdictional programs. Indeed, my dissertation suggests that REDD+, rather than making changes on the ground in the effort to reduce deforestation and mitigate climate change, has instead consisted of an elaborate performance of different actors along the REDD+ chain, scratching one another's backs. There is a high likelihood of such acting in the production of offsets in ETS schemes in general, for there is no incentive for these actors to do otherwise in the process to generate value from this invisible good that a tiny number of individuals have the power or capacity to "certify" as "real." It is tempting to think that working with "the right" partners in "the right" places will address this issue. However, even where we think we have ideal partners today, we have to recognize that these partners will change over time, and may have different priorities in the future. My research also shows that even these ideal scenarios create leakage into those places where governance conditions are not so ideal – the example surrounding me in Colombia of the never-ending "war on coca"

illustrates such a leakage phenomenon, deriving from a context where global demand for a product remains strong, despite illegality. The national governments in these countries lack the capacity or will – or some combination of both, across the many actors that make up the state – to control this deforestation and degradation, whether they have REDD+ funding or not. We may be alarmed by biodiversity loss and the climate change threat that this deforestation poses, but California surely has more than enough to govern at home – including in its own forests – and need not invest in exerting control over the forests of other countries. The complexity on the ground and in the politics that shape state action make clear the blind spots of desk studies that suggest that reducing deforestation is a “cost-effective” means of mitigating climate change.

California *does* have the capacity to address its contributions to climate change and environmental injustices here at home. Why not start with halting fossil fuel production here? Or investing more in our inadequate public transportation systems and improving incentives to use them in congested metropolitan areas? Or planting fire-smart trees in *our* cities and suburbs, rather than demanding from afar that some of the most vulnerable populations in the world practice particular forest management? If we want to help address tropical deforestation, meanwhile, we can further disincentivize consumers here from purchasing timber or agricultural products that have come at a cost of deforestation there. And, we can support leaders from around the world trying to reduce deforestation by sharing our own experiences and tools with them -- technological advances that have been made in monitoring forest loss, many of which have come out of labs and organizations here in California, are a good example of this. But information and tools alone do not stop deforestation. Continuous political will in these other countries is required. *Assuming that other jurisdictions around the world – which have not benefitted from many decades of fossil fuel use as we have here in California, but are already feel the impacts of climate change – are going to have more effective and “cheaper” climate governance solutions than we do at home is not only deeply sad: it will move us closer to climate disaster.* I hope that we continue to push the envelope on climate change as a state, and that means getting even more serious about investments and compromises around us, and moving past this flawed and distracting plan.

I would be keen to share more of my research with the Board, or to provide recommendations for further reading.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lauren Withey". The signature is stylized with a large, sweeping initial 'L' and a trailing flourish.

Lauren Withey

Ph.D. Candidate
Environmental Science, Policy and Management