

# Comments for the California Air Resources Board (CARB) on the California Tropical Forest Standard and Draft Environmental Analysis

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A hypothetical scientist competent in climatology, forestry and the theory of risk and uncertainty, but innocent of the political economy of carbon markets and climate negotiations, would have good reason to be astounded by the draft for a California Tropical Forest Standard (TFS) now being presented for public comment, as well as by the Draft Environmental Analysis (EA) on its proposed endorsement.

Such a scientist could be excused for running out of patience midway through these texts and simply suggesting that CARB staff and consultants, including Jason Gray, go back to school to educate themselves about, at a bare minimum:

1. The well-established *climatological* incommensurability of fossil and biotic carbon (Falkowski et al. 2000; Dooley 2014), which precludes the possibility of a scientific defense of the equivalences on which the exchange system mooted by the TFS would have to be founded. In practical terms, this incommensurability makes it inevitable that endorsement of the TFS and its application of to the California carbon trading system would *worsen* climate change, with effects in California itself as elsewhere – an outcome contrary to, and unacknowledged by, the conclusions of the draft EA.
2. The nature of climate change uncertainty, political uncertainty, financial uncertainty, and management uncertainty (p. 20) and their irreducibility to calculable, economizable, “buffer”-able (pp. 15-16, 19, 25; Draft EA, pp. 11, 59, 98) “risk” of the failure of the above equivalences (“reversals” [sic] fixable by “uncertainty deductions” [sic], etc.) (Wagner and Weitzmann 2018, Molina 2018, Read 2017, Anderson 2012, Weitzman 2011, Lohmann 2010).
3. The racism inherent both in the TFS’s concept of “reference level” (pp. 4-7, 9-14, 16, 23; Draft EA, p. 59) and in its unilateral imposition of a contested “white” conception of forests as passive nonhuman resources for producing the cheapest (most “cost-effective” [CARB, “Notice of Public Meeting to Consider Endorsement of the California Tropical Forest Standard”, pp. 1,3]) pollution rights allowing regulated California industries to burn fossil fuels as long as possible. The particular kind of racism encapsulated in the concept of “reference level” is repeated on p. 59 of the Draft EA for the TFS, which states that a California policy scenario in which the TFS was not endorsed “would not result in efforts to reduce emissions from tropical deforestation” – in other words, that what the EA draft calls “local communities” must be assumed to be helpless in the face of “existing economic conditions” favoring deforestation, since *ex hypothesi* they lack forest conservation initiatives of their own that are robust enough to develop meaningfully in the absence of a production line for generating pollution rights for industry. This representation of tropical “local communities” as a quantifiably static background (ensuring a calculable “reference level”) devoid of their own historical initiative simply reproduces discredited colonial-era mythologies of “the natives” as an unchanging, “traditional” mass awaiting the dynamic interventions of history-making Western “modernity” (Lohmann 2016a). The second racist assumption, that all forests, including those targeted by incipient offset programs in Mexico, Brazil and

elsewhere, are “white” forests – that is, rentable *resources* for fabricating environmental services – as opposed to what Casey Camp Horinek refers to as “*sources*” – is also pervasive throughout the TFS and draft EA (Hage 2017; Lohmann 2016b). This double dose of racism in the TFS, among its other effects, impedes possibilities for effective climate action insofar as it blocks the road of inquiry and discussion. This again flies in the face of the message that the draft EA attempts to advance.

To our hypothetical naive, impartial scientist, it might therefore seem that CARB, despite a decade of learning opportunities, simply remains ignorant of the science regarding forest offsets, perhaps merely having been innocently misled by a troop of interested consultants, technicians and politicians.

However, I would incline to a more charitable view. Having observed the disconnect between empirical research and offset theory in numerous other contexts as well over the past 20 years of analyzing carbon markets, I’m well aware of the institutional forces that can pre-commit state bodies to wishing away realities such as those sketched above as if they were “flaws” that were somehow “remediable” through more work (see, e.g., <http://www.thecornerhouse.org.uk/resource/comments-california-air-resources-board-white-paper-sector-based-offset-credits>).

So let me take the trouble to translate the scientific lessons that CARB’s TFS fails to heed into frank political terms that may get through more readily to CARB’s staff and board.

Increasingly, CARB-promoted schemes of carbon pricing and trading are being legitimized through an imagined contrast with the reactionary stances of the Donald Trump regime regarding climate change. Recent emotional, not to say mawkish, public speeches by Governor Brown, while content-lite, make much of the comparative right-on heroism of California’s government in recognizing and responding to the threats of global warming, even if they do tend to be accompanied by brutalist outbursts against critics (“let’s put *you* in the ground” [<http://inthesetimes.com/article/20688/jerry-brown-cop23-climate-un-bloomberg-fracking-cap-trade-it-takes-roots>]).

But the contempt for knowledge and research that shows up in the record of both CARB’s carbon trading advocacy and in Trump’s climate policies suggests that this PR tactic is headed for a rude debunking. Let me suggest three ways in which it is growing increasingly obvious that CARB’s TFS and Trump’s approach in fact complement each other in impeding effective climate change action.

**Climate science denialism.** Which is the more deeply implicated in the denial of climate science, Trump’s climate doctrine or CARB’s draft TFS? Of course, Trump and CARB are engaged in very different types of denialism. Trump’s regime flaunts a frank disrespect for inconvenient climate modelling – a disrespect that differs sharply from CARB’s praiseworthy acceptance of climatological consensus, since CARB limits its science denialism to issues such as those mentioned above. But how much of a practical difference does this distinction make? Both Trump’s denial of a link between fossil fuel extraction and global warming and CARB’s commitment to the fraudulent science making possible the manufacture of cheap pollution rights enabling fossil-fuelled industries to avoid structural change function to support an identical end: delay.

**Environmental racism.** Trump advocates the dismantling of environmental regulation because it is challenging for industry, especially at a time of profit crisis, to be discouraged from freely dumping pollution in black and brown bodies as well as in water, land and air. CARB, on the other hand, promotes a “command and commodify” type of regulation (Rea 2017) whose cheapness requires a type of accounting methodology that would be nonfunctional without the racism concealed in concepts such as “reference level”. Again, there is a significant distinction here, but what difference does this

distinction make in practice? CARB's policy concentrates pollutants in the bodies of fenceline communities just as effectively as does Trump's policy, while adding racist "green grabbing" (Fairhead et al. 2012) initiatives in countries in the global South into the mix as well.

**Commitment to extending the historical life of fossil fuels.** The point of many of Trump's policies is to keep fossil fuel use going as long as possible, as cheaply as possible. Is the point of the TFS any different? Since the 1960s, the paramount reason that forest offsets, particularly tropical forest offsets, have been advocated by economic theorists is precisely that they are reputedly one of the cheapest methods of extending fossil fuel extraction and use as long as possible, regardless of the ultimate consequences. The TFS falls into place as one more means toward this goal. Here again the difference between Trump and CARB appears to be one of tactics, not of objectives. In the end, the two share a bottomless contempt for the public and its concerns about climate change, regardless of their different expressions. When this contempt will come back to bite CARB, and how painfully, is still an open question (the recent demonstrations in San Francisco against CARB's work may be one prefiguration), but it is only a matter of time.

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