

THE CURRENT ROLE OF THE ENVIRONMENT IN
REINFORCING ACTS OF DOMESTIC TERRORISM: HOW FEAR
OF A CLIMATE CHANGE APOCALYPSE MAY STRENGTHEN
RIGHT-WING HATE GROUPS

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Right-wing extremist organizations, like white supremacists and nativists, are using the environment as a rallying cry to gain supporters of their anti-social agendas. Apocalyptic rhetoric about climate change and the lack of action to combat it has frightened some people into accepting the simplistic, violent worldview of these groups. Although the violence is new, the coupling of racism and anti-immigration rants with environmental goals is not—it is part of our cultural history. This Article provides some background on the threats of environmental and domestic terrorism facing our nation and describes how the present-day rhetoric of fear of an environmental Armageddon may be helping right-wing extremist organizations to gain supporters. The Article suggests that moderating the rhetoric and identifying actions individuals can take to change that future may not only have beneficial environmental results, but may also lessen the appeal of these groups.

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INTRODUCTION

Most of us view the natural environment positively, a respite from the built environment, a source of beauty and peace, even poetic inspiration. We value and protect its wildness and wild inhabitants by a variety of laws. But nature is vanishing; what remains is deteriorating mainly in response to human activities. The rate of loss and degradation is accelerating due in large part to climate change. The future is occluded by dire predictions of what it may look like. This has led to a new hysterical rhetoric of sea level rise, dangerously high temperatures, out of control wildfires, and more frequent deadly storms—doomsday predictions not unlike those espoused by religious zealots centuries ago. According to those predictions, the world, as we know it, is rapidly ending; even the near-term future looks dire.

Most of these predictions of environmental catastrophe are ignored by governments and private citizens. The scope and complexity of the causes of this looming catastrophe, like climate change, are overwhelming; potential solutions are either too painful in terms of the sacrifices that will have to be made or too difficult given the geographic scope of the problem and the lack of institutions to administer any possible solution—creating a truly “wicked” problem.¹ A few people are not only hearing these predictions, but are literally being frightened out of their wits by them and by the government’s perceived failure to take sufficient corrective action. This rhetoric of fear of an unavoidable environmental holocaust has joined forces with a rhetoric of hate in the minds of some, leading to violence against racial and ethnic minorities, women, and government officials, among others.²

Although surprising at first glance, the link between environmental concerns and extreme right-wing violence has deep roots in our culture

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¹ See Cary Coglianese, *Climate Change Necessitates Normative Change*, THE REG. REV. (Jan. 27, 2020), http://www.theregreview.org/2020/01/27/coglianese-climate-change-necessitates-normative-change/?utm_source=The+Regulatory+Review+newsletter (characterizing climate change as a “wicked policy problem” (internal quotation marks omitted)).

² See, e.g., JEROME P. BJELOPERA, CONG. RSCH. SERV., R44921, DOMESTIC TERRORISM: AN OVERVIEW, 25-26 (2017) (discussing the Bundy brothers’ armed occupation of the Malheur National Wildlife Refuge in Oregon for 41 days in 2015 and early 2016, during which federal agents killed one member of the group and substantial damage to federal property was done, which is a recent example of this rage being directed at the government). For purposes of this article, the choice of a national wildlife refuge as the site of the group’s protest is interesting.

and history.³ In the past, violent acts, like tree spiking or throwing blood on people wearing fur coats, were often part of a group's broader public campaign to end what they thought were bad environmental policies.⁴ The violent acts that are the subject of this Article, however, are different. These acts, like mass shootings, are mostly carried out by individuals and are not part of any broader campaign to stop environmentally harmful activities. This Article explores this new phenomenon—the linkage between fear of environmental harm and acts of deadly violence. Among the questions the Article tries to answer are whether this connection was predictable given its historical roots, and, if it was, could the appeal of violence have been, or still be, averted by changing the way we talk about environmental threats.

Part I of the Article describes the current fragile state of the environment and how right-wing terrorists are capitalizing on that situation. Part II looks at the reappearance of environmental concerns in right-wing extremist rhetoric and the seductiveness and toxicity of that combination. Part III shows how both the government and non-governmental organizations use fear as a motivational tool and how it may lead people to accept the use of violence by right-wing groups who cloak their message in the bromide of environmental protection. Part IV discusses how changing the message of unstoppable global disasters and helplessness to one of hopeful possibilities might channel this fear away from violence into productive action and might break the symbioses between environmental concerns and anti-social movements.

This Article contributes to the literature by identifying the nexus between fear of an environmental catastrophe and right-wing anti-social actions as well as by reaffirming what has almost become a cliché—that the message matters, but now in new and frightening ways.

³ See generally JEDEDIAH PURDY, *THIS LAND IS OUR LAND: THE STRUGGLE FOR A NEW COMMONWEALTH* (2019) (discussing the linkage between conservation and racism).

⁴ But cf. William Finnegan, *When the Unabomber Was Arrested, One of the Longest Manhunts in FBI History Was Finally Over*, SMITHSONIAN MAG. (May 2018), <https://www.smithsonianmag.com/smithsonian-institution/unabomber-arrested-longest-manhunt-fbi-history-over-180968744/> (describing the manhunt for the Unabomber, whose individually-driven domestic terrorism is an exception to this historical trend).

I. WHERE WE ARE TODAY—THE SAD STATE OF THE PLANET AND
DOMESTIC TERRORISM.

A. *The State of the Planet*

[I]t would be a damn shame if we went extinct prematurely.⁵

The planet is rapidly changing and not for the better. The worst case scenarios projected in 2007, when the Northwest passage first became navigable, have been “overtaken by the unforeseen acceleration of events.”⁶ Now you can book a cruise through the passage.⁷ In 2019, the United Nations reported that it would take only twelve years before the globe would be faced with a catastrophe, that can be averted only by reducing fossil fuel use by almost half.⁸ Wildfires in Australia have destroyed more than 17.9 million acres of land (an area larger than Belgium and Denmark combined), including critically important habitat for wildlife.⁹ The fires killed at least 28 people, destroyed more than 3,000 homes, and affected nearly three billion animals,¹⁰ including killing nearly one-third of the koalas in New South Wales and destroying one-third of their habitat.¹¹ “Australia had its warmest and driest year on record (dating to 1910 and 1900, respectively), with [terrestrial water storage] losses almost everywhere save for the northeast of the country, contributing to notorious wildfire damage.”¹² Serial bomb cyclones have caused severe weather in the Plains states

⁵ Alan Weisman, *Burning Down the House*, 66-13 N.Y. REV. OF BOOKS, Aug. 2019, at 9, <https://www.nybooks.com/articles/2019/08/15/climate-change-burning-down-house/?printpage=true>.

⁶ *Id.* at 1.

⁷ *Id.*; see also J. Blunden & D.S. Arndt, eds., *A Look at 2019: Takeaway Points from the State of the Climate*, AM. METEOROLOGICAL SOC'Y 3, 5 (2020), https://www.ametsoc.org/ams/assets/File/publications/Executive%20Summary%202019_SoC.pdf (reporting that July [2019] became the hottest month in records dating to the mid- to late-1800s and, “The Arctic land surface temperature for 2019 was the second highest in the 120-year record, following 2016, with record high temperatures in Alaska and northwest Canada. Mean annual Arctic surface air temperatures over land have increased more than twice as fast as the global mean since the mid-1980s.”).

⁸ Weisman *supra* note 5, at 1.

⁹ Jessie Yeung, *Australia's Deadly Wildfires Are Showing No Signs of Stopping. Here's What You Need to Know*, CNN (Jan. 13, 2020), <https://www.cnn.com/2020/01/01/australia/Australia-fires-explainer-intl-hnk-scli/index.html>.

¹⁰ *New WWF Report: 3 Billion Animals Impacted by Australia's Bushfire Crisis*, WWF (Jul. 28, 2020), <https://www.wwf.org.au/news/news/2020/3-billion-animals-impacted-by-australia-bushfire-crisis#gs.gikqtd>.

¹¹ Yeung, *supra* note 9.

¹² R. J. H. Dunn et al., eds., *State of the Climate in 2019: Global Climate*, 101(8) BULL. AM. METEOROLOGICAL SOC'Y 55 (2020), <https://doi.org/10.1175/BAMS-D-20-0104.1>

and thousand-year floods now appear regularly.¹³ For example, a bomb cyclone hit Nebraska in the spring of 2019, causing historic flooding.¹⁴ Glaciers are calving and polar ice shelves are fracturing. Climate refugees are fleeing from “desiccated East and North Africa and the Middle East, where temperatures have approached 130 degrees Fahrenheit, and from Central America, where alternating periods of drought and floods have now largely replaced normal rainfall.”¹⁵ Cape Town and São Paulo have come within days of running out of water.¹⁶ In 2017, “successive, monstrous hurricanes—Harvey, Irma, and Maria— . . . devastated Texas, Florida, and Puerto Rico.”¹⁷ Experts predict that the indirect impacts of climate change will decrease the amount of time people can work outdoors, cause grain harvests to decline, and drive insurance companies into bankruptcy after successive storms of “biblical” proportions demolish trillions of dollars of property.¹⁸

“The ocean has absorbed about 30% of the anthropogenic carbon dioxide, resulting in ocean acidification . . . that [is] unprecedented for at least the last 65 million years.”¹⁹ The Bulletin of Mathematical Biology predicts “by 2100 the oceans may be too hot for phytoplankton to photosynthesize.”²⁰ Although phytoplankton are virtually invisible in

¹³ Weisman, *supra* note 5, at 2; *see also* Matthew Cappucci, *Bomb Cyclone Shattered Records As It Slammed the West Coast on Tuesday, Including a 106-mph Gust*, WASH. POST (Nov. 27, 2019), <https://www.washingtonpost.com/weather/2019/11/27/bomb-cyclone-shattered-records-it-slammed-west-coast-tuesday-including-mph-wind-gust/> (describing record-breaking bomb cyclone that hit Oregon and Northern California in November, 2019); Dara Lind, *The “500-Year” Flood, Explained: Why Houston Was So Underprepared for Hurricane Harvey*, VOX (Aug. 28, 2017), <https://www.vox.com/science-and-health/2017/8/28/16211392/100-500-year-flood-meaning> (stating six “1000-year” floods occurred in the United States between 2010 and 2014).

¹⁴ Gabriella Borter, *Historic Floods Hit Nebraska After ‘Bomb Cyclone’ Storm*, REUTERS (Mar. 16, 2019), <https://www.reuters.com/article/us-usa-weather/historic-floods-hit-nebraska-after-bomb-cyclone-storm-idUSKCN1QY00Y> (describing “historic flooding” in Nebraska after a bomb cyclone hit the greater region in March, 2019).

¹⁵ Weisman, *supra* note 5, at 2; *see also* Christopher Flavelle, *Climate Change Threatens the World’s Food Supply, UN Warns*, N. Y. TIMES (Aug. 8, 2019), at A1, <https://www.nytimes.com/2019/08/08/climate/climate-change-food-supply.html> (“Between 2010 and 2015 the number of migrants from El Salvador, Guatemala and Honduras showing up at the United States’ border with Mexico increased fivefold, coinciding with a dry period that left many with not enough food and was so unusual that scientists suggested it bears the signal of climate change.”).

¹⁶ Weisman, *supra* note 5, at 7; *see also* Christian Alexander, *Cape Town’s ‘Day Zero’ Water Crisis, One Year Later*, GRIST (Apr. 21, 2019), <https://grist.org/article/cape-towns-day-zero-water-crisis-one-year-later/>.

¹⁷ Weisman, *supra* note 5, at 2.

¹⁸ *Id.* at 7.

¹⁹ IPCC, *GLOBAL WARMING OF 1.5°C* 178 (2018), <https://www.ipcc.ch/sr15/download/#full>.

²⁰ Weisman, *supra* note 5, at 7; *see also* Basque Research, *Phytoplankton and Zooplankton Biomass Are Expected to Decrease by 6% and 11% Respectively by the End of Century Due to*

the ocean because of their microscopic size, “they constitute half the organic matter on Earth.”²¹ Their disappearance would cause “mass mortality of animals and humans.”²²

The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services reported that “one million species already face extinction, many within decades.”²³ Scientists estimate that the current loss of species will be “between 1,000 and 10,000 times higher than the natural extinction rate.”²⁴ For example, coral reefs may experience mass extinctions even if global warming is contained to 1.5° C.²⁵ Humans also need saving as a species. “Human capacity may have finally peaked and actually be declining.”²⁶ Our height and lifespans are plateauing, athletic records are no longer being broken, and IQs are declining after increasing for more than a century.²⁷ Today’s challenge for humanity may be “maintain[ing] the gains of the past,” as opposed to improving on our prior performance.²⁸

Despite the growing evidence of an impending global crisis due to climate change, the world seems ready “to sail through 1.5 and 2 degree increases in the next few decades and keep going.”²⁹ The predicted temperature increase over that time period is between 3 and 4 degrees Celsius,³⁰ though, according to the United Nations, it is entirely possible that on “our current trajectory” we might see nearly a 5 degree Celsius increase in temperature by the end of this century.³¹ “At that level,

Climate Change, SCIENCE DAILY (May 7, 2014), <https://www.sciencedaily.com/releases/2014/05/140507104943.htm> (citing Guillem Chust et al., *Biomass Changes and Trophic Amplification of Plankton in a Warmer Ocean*, GLOBAL CHANGE BIOLOGY (2014), <https://doi.org/10.1111/gcb.12562>).

²¹ Weisman, *supra* note 5, at 7.

²² *Id.*

²³ SANDRA DIAZ ET AL., IPBES, THE GLOBAL ASSESSMENT REPORT ON BIODIVERSITY AND ECOSYSTEM SERVICES, SUMMARY FOR POLICYMAKERS 11-12 (2019), https://ipbes.net/sites/default/files/2020-02/ipbes_global_assessment_report_summary_for_policymakers_en.pdf.

²⁴ Helen Kopnina, *The Lorax Complex: Deep Ecology, Ecocentrism and Exclusion*, 9 J. OF INTEGRATIVE ENVTL. SCI. 235, 236 (2012), <http://dx.doi.org/10.1080/1943815X.2012.742914>.

²⁵ IPCC, *supra* note 19, at 179.

²⁶ Weisman, *supra* note 5, at 9.

²⁷ *Id.*

²⁸ BILL MCKIBBEN, *FALTER: HAS THE HUMAN GAME BEGUN TO PLAY ITSELF OUT?* 235 (2019).

²⁹ Weisman, *supra* note 5, at 3.

³⁰ *Id.*

³¹ *Id.* Accord IPCC, CLIMATE CHANGE 2013: THE PHYSICAL SCIENCE BASIS, SUMMARY FOR POLICYMAKERS 21 (2013), https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf.

anyone still in the tropics would not be able to move around outside without dying.”³²

According to these experts, the planet and the species that occupy it are in dire straits with little being done to slow down the rate of destruction, let alone stop and then reverse the march toward extinction of us all. These facts and predictions are admittedly “hysterical,” as is the glacial pace of humanity’s response.³³

B. Domestic Terrorism, Animal Rights Extremists, and Eco-terrorists

We are inclined to think that foreign nationals conceive and carry out all acts of terrorism on American soil, like the events of September 11, 2001.³⁴ Actually, U.S. citizens perpetrate a surprising and increasing number of them.³⁵ In the last decade, individuals who committed extremist acts within the United States and/or who were inspired by domestic-based extremist ideologies and movements have killed Americans and damaged infrastructure nationwide.³⁶ Since September 11, 2001, far right extremist have killed 110 people in the United States; jihadists have killed 107.³⁷

White supremacist propaganda is increasing across the country as well. Anti-Defamation League data reflects an increase in daily reported incidents from 1,214 in 2018 to 2,713 in 2019—an average of more than seven cases a day.³⁸ On college and university campuses, the amount of

³² Weisman, *supra* note 5, at 3 (internal quotations omitted).

³³ *Id.*

³⁴ See generally Max Rose & Ali H. Soufan, Opinion, *We Once Fought Jihadists. Now We Battle White Supremacists.*, N.Y. TIMES, Feb. 11, 2020, at A27 (documenting “a global network of white supremacist extremist that stretches across North America, Europe and Australia,” and stating “the enemy we currently face is not a jihadist threat. It’s white supremacists—in the United States and overseas”).

³⁵ Ned MacFarquhar & Adam Goldman, *A New Face of White Supremacy: Plots Expose Danger of the ‘Base’*, NY TIMES, Jan. 20, 2020, at A10 (stating that there appears to be a “significant increase in racially motivated violent extremism in the United States and . . . a growing increase in white nationalism and white supremacy extremist movements.”). MacFarquhar and Goldman discuss in particular the “expanding threat” of an organization called the Base, which the FBI describes as an “accelerationist organization, seeking to speed the collapse of the country and give rise to a state of its own in the Pacific Northwest by killing minorities, particularly African-Americans and Jews”).

³⁶ BJELOPERA, *supra* note 2 *passim*. Bjelopera also highlights that this problem is not new, and states, “[t]he Federal Bureau of Investigation (FBI) reported in 1999 that ‘[d]uring the past 30 years, the vast majority—but not all—of the deadly terrorist attacks occurring in the United States have been perpetrated by domestic extremists.’” *Id.* at 1.

³⁷ Rose & Soufan, *supra* note 34 (stating that “the trend is worsening” with 2018 seeing the most extremist right-wing violence since Timothy McVeigh planted a bomb in the Alfred P. Morrow building in Oklahoma City.)

³⁸ Adeel Hassan, *White Supremacist Groups Expanded Propaganda Efforts, Report Finds*, N.Y. TIMES, Feb. 12, 2020, at A22.

white supremacist propaganda distributed increased from 320 incidents in 2018 to 630 last year.³⁹ Internet postings can “resonate with some people,” encouraging them to “post physical propaganda . . . that spreads hateful narratives and anxiety” in vulnerable communities, allowing those ideas to seep in.⁴⁰ It is in this context that FBI Director Christopher Wray declared that “‘violent extremists motivated by race’ are ‘‘a national threat priority’ equivalent to foreign terrorist organizations like ISIS.”⁴¹

The FBI and Department of Homeland Security both define domestic terrorism as “Americans attacking Americans based on U.S.-based extremist ideologies.”⁴² Domestic terrorists are distinguishable from “ordinary criminals” because they are usually propelled by a cause or by a belief system.⁴³ The FBI considers eco-extremists and animal rights extremists, who have damaged property, to be domestic terrorists.⁴⁴ Between 1979 to early 2009, the Bureau estimates that animal rights extremists and ecoterrorists together committed between 1,800 and 2,000 criminal incidents accounting for more than \$110 million in damages.⁴⁵ Their targets included large drug companies, laboratories,

³⁹ *Id.* (explaining the increase in propaganda as a result of the 2017 white supremacist rally in Charlottesville, Virginia at which a counter-protester was killed when a man drove his car into a crowd. The resulting hostile publicity basically drove these groups underground to proselytize on the internet instead of at public rallies.)

⁴⁰ Hassan, *supra* note 38.

⁴¹ *Id.*

⁴² BJELOPERA, *supra* note 2, at 4; *see also* Kopnina, *supra* note 24, at 241 (“Eco-terrorism is defined by the FBI’s Domestic Terrorism Section as ‘the use or threatened use of violence of a criminal nature against innocent victims or property by an environmentally-oriented, subnational group for environmental-political reasons, or aimed at an audience beyond the target, often of a symbolic nature.’”). However, Bjelopera notes that, at least in part, the origins of these groups can be found in Europe. BJELOPERA, *supra* note 2, at 4. For example, “Nazism—with its German origins . . . is an element within domestic white supremacist extremism. Anarchism, the philosophy followed by anarchist extremists, also has long-standing European roots. The racist skinhead movement traces its origins abroad—to the United Kingdom—as well.” BJELOPERA, *supra* note 2, at 4-5. There are also anarchist extremists, a subset of terrorists, who are usually “event driven” and can be found at political conventions, as well as at economic and financial summits. *Id.* at 15. Their targets are typically “symbols of Western civilization that they perceive to be the root causes of all societal ills—i.e., financial corporations, government institutions, multinational companies, and law enforcement agencies.” *Id.*

⁴³ BJELOPERA, *supra* note 2, at 6.

⁴⁴ *Id.* at 10. This categorization stems from their stated criteria. *Id.* at 8. (“First, extremism refers to an ideology outside a society’s key values, and for liberal democracies, such ideologies ‘support racial or religious supremacy and/or oppose the core principles of democracy and human rights.’ Second, extremism can refer to the use of tactics that ignore the rights of others to achieve an ideological goal.”)

⁴⁵ *Id.* at 35. Also notable was a dip in activity by 2012, which the Bureau attributes to both successful prosecutions in 2007 and the election of a Democratic administration, which may have been viewed as more sympathetic with the goals of ecoterrorists making radical actions unnecessary. *Id.* at 40.

ski resorts, car dealerships, lumber companies, and even individual researchers.⁴⁶ In addition to the direct costs imposed on businesses and scientific laboratories, these groups have adversely affected scientific research by destroying equipment and research materials, pushing some scientists to stop engaging in any activities that involve using animals, and even driving students away from research programs involving live animals.⁴⁷

In the last forty years, extremist environmental and animal rights organizations have engaged in violent acts to promote or oppose environmental policies. However, these groups are quite different from and do not account for the separate emergence of white supremacists and other fringe right-wing extremist groups who espouse environmental concerns as the basis for their violent actions against minorities and immigrants. The next part of the Article looks at this phenomenon and finds the merger of environmental and anti-social goals in the twenty-first century to be familiar, yet deeply disturbing and frightening.

II. THE APPEARANCE OF ENVIRONMENTAL MANIFESTOS AT RIGHT-WING TERRORIST INCIDENTS.

Some of the awkwardness of environmental politics since the 1970s, now even more acute in the age of climate change, is that it lays claim to worldwide problems, but brings to them some of the cultural habits of a more parochial and sometimes nastier movement.⁴⁸

Surprising to many, environmental manifestoes have been appearing recently in the hands of right-wing extremists. However, this should not be so shocking. In the early twentieth century, nativism and racism were prominent in environmental thinking. This has led some, like Peter Beinart, a former editor of the *New Republic*, to say, “[w]hat we’re witnessing is less the birth of white-nationalist environmentalism than its rebirth.”⁴⁹

A. *The Present*

What follows in this section is a description of some of the activities and activists indicative of a strong right wing extremist sentiment at the

⁴⁶ *Id.* at 35-36.

⁴⁷ *Id.*

⁴⁸ See PURDY, *supra* note 3, at 122.

⁴⁹ Peter Beinart, *White Nationalists Discover the Environment*, THE ATLANTIC (Aug. 5, 2019), https://www.theatlantic.com/ideas/archive/2019/08/white-nationalists-discover-the-environment/595489/?utm_source=newsletter&utm_medium=email.

end of the second decade of the twenty-first century. Nothing particularly connects them other than their hatred of immigrants and non-white people.

For example, in Spring 2019, a gunman killed 21 people at a Walmart in the border city of El Paso, Texas. Moments before, he posted “a four-page rant” justifying the attack.⁵⁰ While the rant included the usual “white-nationalist diatribes about ‘cultural and ethnic replacement’ and an immigrant ‘invasion,’” it also included another topic that presented a less obvious fit “into the white-nationalist script”: environmental concerns.⁵¹ Indeed, many would agree with the manifesto’s text to the extent that it complains about the modern American lifestyle destroying the environment. But it veers dramatically from traditional environmental principles by suggesting that expunging Latinos from the country, rather than making individual lifestyle changes or changing policy, is the best way to protect the environment.⁵² According to Peter Beinart, the manifesto uses the mantra of “threats to the planet” as a way to “sow racial panic.”⁵³

To bolster its legitimacy, Beinart recounts that the manifesto also refers to an earlier document written by the gunman who killed more than 50 Muslims in Christchurch, New Zealand. The New Zealand document offered similar environmental justifications for the violence: “[n]on-Europeans are overpopulating the planet, the Christchurch killer insisted, and killing them will save it.”⁵⁴ While more right-wing activists are acknowledging the threats that climate change has brought to the globe, “instead of endorsing pollution controls and carbon-emissions treaties,” Beinart says the extremists among them offer a different answer to these threats: “[k]eep nonwhite immigrants out.”⁵⁵

In a 2017 column entitled ‘Choose Between a Green America and a Brown America,’ . . . Ann Coulter, a conservative media pundit and book author, argued that:

mass Third World immigration is a triple whammy for the environment because: (1) millions more people are tromping through our country; (2) The new people do not share

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² *Id.*

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ *Id.*

Americans' love of nature and cleanliness; and (3) We're not allowed to criticize them.⁵⁶

She tweeted last year that she is "fine with pretending to believe in global warming if we can save our language, culture & borders" in the process.⁵⁷

Coulter is not alone in her anti-immigrant sentiments. Tucker Carlson, a conservative journalist and political commentator on Fox News, explained that his hate of litter was one of the reasons he opposed illegal immigration.⁵⁸ Carlson complained in a broadcast that "illegal immigration comes at a huge cost to our environment."⁵⁹ The Federalist, a conservative online magazine and podcast, applauded Carlson's statement, saying "Tucker Carlson Is Absolutely Right: Illegal Immigration Is Destroying the Environment."⁶⁰ Debbie Dooley, a Tea Party activist and Breitbart contributor, created what she calls the Green Tea Party, which lobbies for both tougher immigration restrictions and environmental standards.⁶¹ The late Mellon heir Cordelia Scaife May's passion for birds led her to support anti-immigration groups financially, which she saw as a way of controlling the lethal threat to the environment of overpopulation. She believed that America was "'being invaded on all fronts' by foreigners, who '[bred] like hamsters' and exhaust natural resources."⁶²

⁵⁶ Ann Coulter, *Choose Between a Green America and a Brown America*, DAILY CALLER (Apr. 19, 2017), <https://dailycaller.com/2017/04/19/coulter-decide-between-a-green-america-and-a-brown-america/>

⁵⁷ Ann Coulter (@AnnCoulter), TWITTER (Apr. 25, 2018, 11:25 AM), <https://twitter.com/AnnCoulter/status/989163387442561024>.

⁵⁸ Elaina Plott, *What Does Tucker Carlson Believe?*, ATLANTIC (Dec. 15, 2019), <https://www.theatlantic.com/politics/archive/2019/12/tucker-carlson-fox-news/603595/>.

⁵⁹ Tucker Carlson, *Tucker to Critics: We Are Not Intimidated*, FOX NEWS (Dec. 18, 2018), <https://www.foxnews.com/opinion/tucker-carlson-responds-to-his-immigration-critics-were-not-intimidated-well-continue-to-tell-the-truth>.

⁶⁰ Quentin Borges-Silva, *Tucker Carlson Is Absolutely Right: Illegal Immigration Is Destroying the Environment*, FEDERALIST (Dec. 21, 2018), <https://thefederalist.com/2018/12/21/tucker-carlson-absolutely-right-illegal-immigration-destroying-environment/>; see also Beth Gardiner, Opinion, *White Supremacy Goes Green*, N.Y. TIMES (Feb. 28, 2020), at SR4, <https://www.nytimes.com/2020/02/28/opinion/sunday/far-right-climate-change.html> (describing how Carlson falsely claimed "in an interview with the Atlantic that the Potomac River has gotten dirtier 'and that litter is left almost exclusively by immigrants.' The month before, he asked why environmentalists want to let refugees into the United States: 'Isn't crowding your country the fastest way to despoil it, to pollute it?'").

⁶¹ Beinart, *supra* note 49.

⁶² Nicholas Kulish & Mike McIntire, *An Heiress Intent on Closing America's Doors: How a Nature Lover Helped Fuel the Trump Immigration Agenda*, N.Y. TIMES (Aug. 15, 2019), at A1, <https://www.nytimes.com/2019/08/14/us/anti-immigration-cordelia-scaife-may.html>.

B. The Past

While the present threat of climate change is new, nativism and environmentalism have been “deeply intertwined” in this country’s history.⁶³ Madison Grant, a founder of the Save the Redwoods League and the National Parks Association in the early twentieth century, was also vice president of the Immigration Restriction League.⁶⁴ The League lobbied successfully to stop most eastern and southern European immigration to the United States in the 1920s.⁶⁵ Grant wrote a book in 1916, entitled *The Passing of the Great Race*, in which he “proposed a racial hierarchy of European peoples.”⁶⁶ His book “greatly impressed Adolf Hitler.”⁶⁷ Importantly, Grant “saw no contradiction between his environmentalism and his racism.”⁶⁸

President Theodore Roosevelt, well-known for his conservationist policies, supported Grant’s racist activism. He wrote Grant praising his book, referring to it as “a capital book; in purpose, in vision, in grasp of the facts our people most need to realize.”⁶⁹ Henry Fairfield Osborn, head of the New York Zoological Society and Chair of the American Museum of Natural History’s Board of Trustees, penned the foreword to Grant’s book in which he wrote, “conservation of that race which has given us the true spirit of Americanism is not a matter either of racial pride or of racial prejudice; it is a matter of love of country.”⁷⁰ “For Grant, Roosevelt, and other architects of the country’s parks and game refuges, wild nature was worth saving for its aristocratic qualities; where these were lacking, the pioneering conservationists were indifferent.”⁷¹ This mindset was even reflected in ecologist Garret Hardin’s works on the tragedy of the commons and the threat of human overpopulation.⁷² He became an advocate of what he called “lifeboat

⁶³ Nils Gilman, *The Coming Avocado Politics: What Happens When the Ethno-Nationalist Right Gets Serious About the Climate Emergency*, BREAKTHROUGH J., Feb. 2020, (“The history of American conservationism is likewise overflowing with shameless ethnocentrism.”).

⁶⁴ Beinart, *supra* note 49. Grant, who was a cofounder of the Bronx Zoo, “supported putting an African of pygmy origin on display in the Monkey House in 1906.” Gilman, *supra* note 63. Grant also played an important role in implementing several anti-miscegenation laws, like Virginia’s 1924 Racial Integrity Act which codified the “one drop rule of race,” leading to thousands of forced sterilizations. *Id.*

⁶⁵ Beinart, *supra* note 49.

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *Id.*

⁶⁹ PURDY, *supra* note 3, at 113.

⁷⁰ *Id.*

⁷¹ *Id.* at 114.

⁷² Garrett Hardin, *The Tragedy of the Commons*, 162 SCIENCE 1243 (1968).

ethics,” which may require throwing someone overboard, likely from the Third World, to assure that citizens from rich countries survived.⁷³

Jedediah Purdy writes in *This Land Is Our Land: The Struggle for a New Commonwealth* that “the nature” these environmental leaders “loved was the nature that made them feel noble, socially and, in their imaginations, racially.”⁷⁴ “Gifford Pinchot, the country’s foremost theorizer and popularizer of conservation and head of Roosevelt’s Forest Service, was a delegate to the first and second International Eugenics Congresses in 1912 and 1921 and a member of the advisory council of the American Eugenics Society from 1925 to 1935.”⁷⁵ John Muir “felt fraternity with four-legged ‘animal people.’”⁷⁶ After “a thousand-mile walk from the Upper Midwest to the Gulf of Mexico,” Muir commented on “the laziness of ‘Sambos.’ Later he lamented the ‘dirty and irregular life’ of Indians in the Merced River valley near Yosemite.”⁷⁷ The vision of nature of these early conservationists was oppositional to civilization—“[t]hey went to the woods to escape aspects of humanity. They created and preserved versions of the wild that promised to exclude the human qualities they despised.”⁷⁸

According to Purdy, “[t]his willful, disingenuous blending of racism with what is sometimes called ‘American nationalism’ remains familiar today.”⁷⁹ The “exclusionary politics of nature” never completely disappeared; for example, in his 1968 book *The Population Bomb*, biologist Paul Ehrlich recalled his horrified reaction to overpopulation in a Delhi slum seen through a taxi window.⁸⁰ In recalling this memory, Purdy says Ehrlich was conceding that “his environmentalist imperatives were powered by fear and repugnance at slum dwellers leading their lives in public view. At the very least, he assumed that his readers would find his repugnance resonant, and he was glad to appeal to it.”⁸¹ President Nixon’s 1970 State of the Union address, while devoting “less than a hundred words [to] Vietnam . . . launched a new racialized politics with calls for a ‘war’ on crime and attacks on the

⁷³ Gilman, *supra* note 63.

⁷⁴ PURDY, *supra* note 3, at 114. Purdy also refers to a 1909 report to Roosevelt’s National Conservation Commission, in which “Yale professor Irving Fisher broke off from a discussion of public health to recommend preventing ‘paupers’ and physically unhealthy people from reproducing and warned against the ‘race suicide’ that would follow if the country did not replenish itself with Northern European stock.” *Id.* at 115.

⁷⁵ *Id.* at 115.

⁷⁶ *Id.* at 116 (quoting JOHN MUIR, OUR NATIONAL PARKS 16 (1901)).

⁷⁷ *Id.*

⁷⁸ *Id.* at 117.

⁷⁹ *Id.* at 113.

⁸⁰ *Id.* at 118-119.

⁸¹ *Id.*

welfare system.”⁸² At the same time, Purdy comments, President Nixon “spent almost a thousand words on the environment, which he called ‘a cause beyond party and beyond factions.’”⁸³ Purdy interprets this as Nixon thinking that the environment “could be a cause for the white majority he was working to assemble.”⁸⁴

Racism was reflected in the policies of national environmental groups then too. “When the Sierra Club polled its members in 1972 on whether the club should ‘concern itself with the conservation problems of such special groups as the urban poor and ethnic minorities;’ 40 percent of respondents were strongly opposed and only 15 percent were supportive.”⁸⁵ John Hultgren, who wrote *Border Walls Gone Green: Nature and Anti-immigrant Politics in America*, wrote that from “‘from the 1980s into the early 2000s . . . environmentalists’ in groups such as the Sierra Club and Earth First! ‘heatedly debated the desirability of further immigration restrictions.’”⁸⁶

This growing “white-nationalist environmentalism . . . blames overpopulation on nonwhite immigrants, insists that they cannot appreciate the ecology of the countries to which they move, and embraces pseudoscientific claims that ethnic groups belong in their native habitats.”⁸⁷ The unsupported idea that allowing fewer people into the country will lessen the strain on the dwindling supplies of food, water, and other essential natural resources as well as lessen the pollution of what remains, has fueled and continues to fuel anti-immigration policies.⁸⁸ Beinart notes that “rather than support policies that would burden white Christians, more and more figures on the right are using immigrants and racial minorities as environmental scapegoats.”⁸⁹ Progressives may have hoped that climate change would

⁸² *Id.* at 120.

⁸³ *Id.* at 120.

⁸⁴ *Id.*

⁸⁵ *Id.*

⁸⁶ Beinart, *supra* note 49; *see also* Gilman, *supra* note 63 (commenting that “until the 1990s, the Sierra Club was one of the fiercest anti-immigrant organizations in America”).

⁸⁷ Beinart, *supra* note 49.

⁸⁸ *Id.*

⁸⁹ *Id.* France’s far right National Rally Party, which has added the environment to its single focus on immigration, is a European example of this. Norimitsu Onishi, *France’s Far Right, a One-Issue Party, Adds Another: The Environment*, N.Y. TIMES, Oct. 18, 2019, at A5 (describing the far-right National Rally Party led by its founder, Marine Le Pen, as creating its brand of “down-to-earth environmentalism” that embraces the concept of an “ecological civilization” and the consumption of “locally grown products.” The National Rally encourages “reining in everything from material consumption and population growth” in order to conserve limited resources, which “dovetails” nicely, with the party’s other goals of “strengthening borders and restricting immigration . . . and promoting a strong French identity against the globalized ‘man from nowhere.’”); *see also* Gilman, *supra* note 63 (reporting on the coalition formed by Austria’s

result in “the global solidarity necessary to bridge divides of faith, race, and nation. But white nationalists are trying to win converts with a different message: that in a world of growing scarcity, it’s every race for itself.”⁹⁰

So, the joinder of racism, nativism, and environmentalism that has flared up in the second decade of the twenty-first century is not new; it has been around either just beneath the surface or out in the open for a century. For some who are frightened by the world they see around them, these messages have a comfortable familiarity. Part III of this Article explores how anxiety about our environmental future can make people vulnerable to simple solutions that demonize “others” as the cause of the problem.

III. HOW THE RIGHT-WING MAY BE USING FEAR OF AN ENVIRONMENTAL ARMAGEDDON TO ATTRACT THE SUPPORT OF ENVIRONMENTALLY CONCERNED INDIVIDUALS

We won’t die from old ageWe’ll die from climate change.⁹¹

We can’t do much else . . . than sit back and enjoy the spectacle of apocalypse while we can.⁹²

As Part I shows, climate change and other environmental problems have made the current world a frightening place for many. Public rhetoric affirms and amplifies those fears. Fear of what the future may bring and a sense of powerlessness to avoid it can lead people to search for simple solutions and to be angry and impatient when they don’t find them. Right-wing hate groups offer a simple solution—hate those who are different from you and blame them for the planet’s suffering. They thus meld environmental concerns with racist and hate-filled rhetoric, justifying targeted violence.

center-right People’s Party and the Austrian Green Party and quoting the new Prime Minister’s statement that the coalition would unite “‘the best of both worlds’ by mandating 100% renewable energy by 2030, banning Islamic headscarves, and detaining asylum seekers”).

⁹⁰ Beinart, *supra* note 49.

⁹¹ Jason Plautz, *The Environmental Burden of Generation Z*, WASH. POST MAG., Feb. 2020, at 14 (describing a sign held by a teenage marcher at a climate demonstration in Denver, Colorado, in September 2019).

⁹² Rachel Kraus, *Hollywood Is Obsessed with Climate Change Disasters. What Does That Mean for the Planet?*, MASHABLE (Nov. 7, 2017), <https://mashable.com/2017/11/07/global-warming-disaster-movies-geostorm> (quoting University of Cologne Professor Roman Bartosch, who specializes in the field of eco-criticism).

A. The Effect of Negative and Hysterical Environmental Rhetoric on Behavior

Popular culture both feeds and feeds off these feelings of hopelessness and dread. Hollywood increasingly depicts the doom aspect of climate change and other environmental apocalypses.⁹³ Filmmakers “imagine postapocalyptic futures or dystopias where ecological collapse is inevitable.”⁹⁴ Pessimism is on the uptick in these films.⁹⁵ The steady increase in climate-related disaster films may be a public response to the sense that there are no “effective solutions for a problem so large that it renders audiences (and global response) numb and paralyzed.”⁹⁶ Books talk about “how quickly ice will melt, how fast and high CO₂ levels and seas will rise, how much methane will be belched from thawing permafrost, how fiercely storms will blow and fires will burn, how long imperiled species can hang on, and how soon fresh water will run out.”⁹⁷ The reader knows that statistics quantifying these phenomena will be “obsolete” by their publication date.⁹⁸ The popular culture message is clear—things are getting worse and nothing is being done about it.

Concerned authors and filmmakers are trying to “tap[] into the underlying emotion of the day: fear . . . to scare the hell out of us, because the alarm sounded by NASA’s Jim Hansen in his electrifying 1988 congressional testimony on how we’ve trashed the atmosphere still hasn’t sufficiently registered.”⁹⁹ Trusted sources of information, like government officials and environmental organizations, are using the

⁹³ *Id.* (“In the last four years, the ratio of non-climate change films to climate change films has nearly evened out. Overall there aren’t many climate change-inspired films, but there are more in the last four years than in all previous time frames. And the increase of climate change-invoking films overlaps with the fact that 2015 and 2016 were already the world’s two hottest years on record, and 2017 is shaping up to be number three.”).

⁹⁴ Cara Buckley, *Hollywood Sells Doom, Not Hope, on Climate*, N.Y. TIMES, Aug. 17, 2019, at C1.

⁹⁵ Kraus, *supra* note 92 (“James Aston, the University of Hull’s Film Studies Programme Chair and an expert in apocalyptic cinema, told *Mashable* via email he’s noticed an increase in pessimism, and a proliferation of adult culpability for the destruction of the Earth.” He referred to an apocalyptic film produced after the millennium, *An Inconvenient Truth*, which “came out in 2006 — its central call to action was that we owe addressing climate change to future generations.”).

⁹⁶ *Id.* (“Our attempt to manipulate the narrative of climate change on screen—through a story in which the hero and the planet survive—may reflect our inability to control the colossal problem of global warming as it becomes more unwieldy in real life.”).

⁹⁷ Weisman, *supra* note 5, at 2.

⁹⁸ *Id.* at 2.

⁹⁹ *Id.* (“‘More than half of the carbon exhaled into the atmosphere by the burning of fossil fuels has been emitted in just the past three decades,’ writes Wallace-Wells, ‘since Al Gore published his first book on climate.’”).

same alarmist environmental descriptors when it comes to talking about the future. For example, the Fourth National Climate Assessment reported in November of last year that:

Earth's climate is now changing faster than at any point in the history of modern civilization, primarily as a result of human activities. The impacts of global climate change are already being felt in the United States and are projected to intensify in the future—but the severity of future impacts will depend largely on actions taken to reduce greenhouse gas emissions and to adapt to the changes that will occur.¹⁰⁰

Filmmakers and authors resort to fear because they know that fear attracts an audience, which increases the commercial value of their products.¹⁰¹ Public officials and environmentalists might use “frightening information” because it is often “more salient and potent than comforting information.”¹⁰²

But, apocalyptic statements, whether in films, books, or government studies, have “real-world impacts.”¹⁰³ “Day in and day out worrying about the unprecedented scale of the risk posed by climate change . . . takes a heavy toll on an individual's well-being, wearing them down, sending some to the ‘breaking point.’”¹⁰⁴ For example, some British psychologists reported that they are seeing an increasing number of children who are suffering anxiety from “the frightening discourse around climate change.”¹⁰⁵ The apocalyptic character of the information about climate change can also be paralyzing.¹⁰⁶ It is easy to be overwhelmed by the scale of the problem—people are “[o]vercome by a sense of powerlessness[;] they simply feel stuck in a situation, with no

¹⁰⁰ ALEXA JAY ET AL., U.S. GLOBAL CHANGE RSCH. PROGRAM, IMPACTS, RISKS, AND ADAPTATION IN THE UNITED STATES: FOURTH NATIONAL CLIMATE ASSESSMENT, VOLUME II 34 (David Reidmiller et al. eds., 2019).

¹⁰¹ See Michael T. Deane, *Movie Genres that Make the Most Money*, INVESTOPEDIA (Jun. 25, 2019), <https://www.investopedia.com/financial-edge/0410/movie-genres-with-the-best-roi.aspx> (“Overall, horror movies consistently have the most films in the top 20 for ROI [return on investment] and the least in the lowest 20 ROI, while drama is the exact opposite, having just two in the top 20 and dominating the bottom 20.”).

¹⁰² Michael P. Vandenbergh, *From Smokestack to SUV: The Individual As Regulated Entity in the New Era of Environmental Law*, 57 VAND. L. REV. 515, 592 (2004).

¹⁰³ Michael Shellenberger, *Why Apocalyptic Claims About Climate Change Are Wrong*, FORBES (Nov. 25, 2019), <https://www.forbes.com/sites/michaelsellenberger/2019/11/25/why-everything-they-say-about-climate-change-is-wrong/#e0715de12d6a>.

¹⁰⁴ Plautz, *supra* note 91, at 14 (quoting Lise Van Susteren, *infra* note 109, at 8 (“Children are especially vulnerable.”)).

¹⁰⁵ Shellenberger, *supra* note 103. Shellenberger goes on to refute many of the hysterical claims made about the impacts of climate change.

¹⁰⁶ Plautz, *supra* note 91, at 17.

way out.”¹⁰⁷ Psychiatrists have coined a new term for the disorder—“eco-anxiety” or “climate depression.”¹⁰⁸ Some experts, such as Lise van Susteren, a psychiatrist who testified for the plaintiffs in *Juliana v. United States*, find this alarmist rhetoric as injurious as the actual harm that may result from climate change.¹⁰⁹

Faced with the frightening facts and complexity of climate change, people may yearn for simple advice on what to do.¹¹⁰ They may also tend “to hold over-simplified beliefs,” and to hold those beliefs “with excessive confidence.”¹¹¹ In these circumstances, once a person has an idea in their head, it may be difficult to dislodge, with the result that they will selectively use new information to support and reinforce those beliefs.¹¹² People also like to think that “everything that happens to them is controllable.”¹¹³ Here, where the information about the environment is frightening, very complex, and seemingly uncontrollable, the presentation of simple solutions, such as those offered by white nationalists and nativists, may be very appealing to some people. The inclination of people to rely on stories and anecdotes to estimate the likelihood that an event will occur, rather than on statistical information, like that presented by climate scientists and advocates, may also lead them to be open to extreme right-wing explanatory, “black-and-white” anecdotes and storytelling.¹¹⁴ In this way, alarmist information might encourage anti-social behavior by non-extremists who are frightened and easily swayed by information that is anecdotal, simple, and packaged in a message that is familiar and positive—“save the earth.”

B. The Importance of Shared Cultural Values

Since most people do not have the knowledge to evaluate factual claims with which they are not familiar, like those made about climate change, they rely on surrogates who appear to have that knowledge and whom they trust.¹¹⁵ People are more likely to trust people who share

¹⁰⁷ *Id.*

¹⁰⁸ *Id.*

¹⁰⁹ Expert Report of Lise Van Susteren, Ex. 1 at 4-6, *Juliana v. United States*, 217 F. Supp. 3d 1224 (D. Or. 2016) (No. 6:15-cv-01517).

¹¹⁰ See Daniel W. Shuman, *The Psychology of Deterrence in Tort Law*, 42 U. KAN. L. REV. 115, 163 (1993).

¹¹¹ *Id.* (quoting THOMAS GILOVICH, *HOW WE KNOW WHAT ISN'T SO* 186 (1991)).

¹¹² *Id.* at 162.

¹¹³ *Id.* at 163 (quoting THOMAS GILOVICH, *supra* note 111).

¹¹⁴ *Id.* at 161, 163 (quoting THOMAS GILOVICH, *supra* note 111).

¹¹⁵ Dan M. Kahan & Donald Braman, *Cultural Cognition and Public Policy*, 24 YALE L. & POL'Y REV. 149, 151 (2006). (“[C]itizens aren’t in a position to figure out through personal investigation whether the death penalty deters, gun control undermines public safety, commerce threatens the environment, et cetera. They have to take the word of those whom they trust on

their values and are “generally predisposed to share a particular view,” *i.e.*, are part of their cultural worldview.¹¹⁶ Culture occupies a place “prior to facts in the cognitive sense that what citizens believe about the empirical consequences of those policies derives from their cultural worldviews. Based on a variety of overlapping psychological mechanisms, individuals accept or reject empirical claims about the consequences of controversial policies based on their vision of a good society.”¹¹⁷ In this sense, “cultural commitments operate as a kind of heuristic in the rational processing of information on public policy matters.”¹¹⁸

People’s perception of the harmfulness of particular actions is “informed by the visceral reactions those activities trigger. And whether those reactions are positive or negative is determined largely by cultural values.”¹¹⁹ Therefore, framing information in a way that makes it compatible with an individual’s cultural values can overcome obstacles that might otherwise make persuasion difficult. People also “rely on those whom they trust to tell them which risk claims are serious and which specious.”¹²⁰ Therefore, people are susceptible to trusting people who share their worldview and cultural values.¹²¹

“The same psychological and social processes that induce individuals to form factual beliefs consistent with their cultural orientation will also prevent them from perceiving contrary empirical data to be credible.”¹²² They can become hardened “to resist empirical data that either threatens practices they revere or bolsters ones they despise, particularly when accepting such data would force them to disagree with individuals they respect.”¹²³ Embedded cultural judgments about what practices are dangerous and which ones are not will be more persuasive than contrary empirical data.¹²⁴ In other words, “the culturally partisan foundation of trust” will induce people to dismiss contradictory information as

issues of what sorts of empirical claims, and what sorts of data supporting such claims, are credible.” (emphasis removed).

¹¹⁶ *Id.* (explaining that even people who believe that they “consider empirical policy issues in an open-minded and wholly instrumental way will align themselves into warring cultural factions”).

¹¹⁷ *Id.* at 150 (emphasis removed)

¹¹⁸ *Id.* at 151.

¹¹⁹ *Id.* at 155.

¹²⁰ *Id.* at 155-56.

¹²¹ *Id.* at 156 (noting the role of “cognitive dissonance avoidance and affect” in biasing people to support or oppose conclusions by others).

¹²² *Id.* at 165.

¹²³ *Id.*

¹²⁴ *Id.*

unreliable, if they believe that people who do not share their own cultural commitments are its source.¹²⁵

The importance of shared cultural values can come into play when people are presented with scientific information, which, in all likelihood, they probably do not have the skills to evaluate on their own.¹²⁶ If scientific facts can be presented in a way that “affirm[s] rather than denigrate[s]” an individual’s cultural values, they are more likely to be accepted uncritically.¹²⁷ Facts divorced from any cultural context can be less important to people than the existence of a policy that reflects a shared social meaning that is consistent with an individual’s cultural values. Once that cultural bond is established, the individual may become more receptive to empirical evidence about the policy’s consequences.¹²⁸

To the extent that extremist groups are successful in coopting environmentalist beliefs and rhetoric, they may be able to gain supporters who share those values and worldviews. This may hold true even when these groups engage in anti-social actions, as long as the facts and positions being expounded are consistent with the targeted audience’s prior beliefs.¹²⁹ The key to a group gaining supporters is to persuade them that the facts that form the basis of the group’s actions are the same ones that form the worldview of potential converts—that the group shares the same cultural destination and that they are not the adversaries of their targeted potential supporters.¹³⁰ Here, the common belief would be the importance of a healthy and safe environment and resistance to anything that threatens the environment.

C. *The Current Weakness of Anti-Racism and Anti-Nativism Norms*

One more feature of the current situation that favors extreme right-wing groups being able to gain supporters for even their most extreme action is the traditional disassociation of popular environmental norms

¹²⁵ *Id.*

¹²⁶ *Id.* at 167 (“Citizens lack the capacity to decide for themselves whose work has more merit. They have no choice but to defer to those whom they trust to tell them which scientists to believe. And the people they trust are inevitably the ones whose cultural values they share, and who are inclined to credit or dismiss scientific evidence based on its conformity to their cultural priors.” (emphasis removed)).

¹²⁷ *Id.* at 168.

¹²⁸ *Id.* at 171.

¹²⁹ *Id.* at 165 (“One constraint on the disposition of individuals to accept empirical evidence that contradicts their culturally conditioned beliefs is the phenomenon of *biased assimilation*. This phenomenon refers to the tendency of individuals to condition their acceptance of new information as reliable based on its conformity to their prior beliefs.”).

¹³⁰ *Id.* at 166.

from weaker anti-racist and anti-nativist norms.¹³¹ Norms can contribute to personal behavior and influence the choices people make about simple things like tipping or giving blood.¹³² While norms can help induce socially positive behavior, like taking personal action to reduce environmental harm,¹³³ the reverse is also true—the wrong type of norms can prompt negative behavior.¹³⁴ For example, if the norm is to litter or not recycle, people will litter and not recycle.

Furthermore, changing norms is a lengthy and sometimes difficult process requiring many external prompts like sanctions or shaming, some of which have strong negatives associated with them.¹³⁵ Here, racists and nativists are using a popular norm, the environmental protection norm, to defeat other social norms that oppose racism and exclusivity. The anti-racism and anti-exclusivity norms are currently weak and susceptible of being ignored or even overridden in the right circumstances, such as those currently presented by an Administration whose actions contradict them almost on a daily basis. The weakness of these norms makes the use of the strong environmental protection norm in extremist rhetoric to encourage racist and nativist behavior very concerning.

The genius of right-wing extremist organizations that this Article identifies is their ability to propound policies and use facts that resonate with frightened politically moderate or even apolitical individuals to enable those individuals to find a comfort zone within extremist groups that they might have eschewed under other circumstances. This may be how the hysteria of the dystopian climate-changed world helps create a community of likes among unlikes that might otherwise not be possible.

Since “people tend to evaluate information based upon the way the information is framed,”¹³⁶ one possible way to discourage people from

¹³¹ For a discussion of the need to unify environmental protection and climate problem-solving with racial justice, see, e.g., Beth Gardiner, *Unequal Impacts: The Deep Links Between Racism and Climate Change*, YALE ENV'T 360 (June 9, 2020), <https://e360.yale.edu/features/unequal-impact-the-deep-links-between-inequality-and-climate-change> (interview with Elizabeth Yeampierre, Co-Chair, Climate Justice Alliance); see also Bill McKibben, *Racism, Police Violence, and Climate Are Not Separate Issues*, NEW YORKER (June 4, 2020), <https://www.newyorker.com/news/annals-of-a-warming-planet/racism-police-violence-and-the-climate-are-not-separate-issues>.

¹³² Hope M. Babcock, *Assuming Personal Responsibility for Improving the Environment: Moving Toward a New Environmental Norm*, 33 HARV. ENVTL. L. REV. 117, 135 (2009) (discussing the role of norms in shaping behavior).

¹³³ See generally *id.* (discussing the role of norms in inducing people to accept more responsibility for their harmful environmental actions).

¹³⁴ See *id.* at 135-38 (discussing different kinds of norms and how they are enforced).

¹³⁵ Babcock, *supra* note 132, at 146-55 (discussing circumstances in which norms change).

¹³⁶ Shuman, *supra* note 110, at 162.

joining right-wing extremist organizations is to reframe the message about environmental harm and hopelessness. Accordingly, Part IV explores what types of information people absorb well and how changing the message might decouple environmental messaging from the far right's agenda.

IV. POSSIBLE RESPONSES TO THE ENVIRONMENTAL CRISIS

One unanticipated consequence of the hysteria about environmental harms like climate change to most readers of this Article is how right-wing extremists have been able to incorporate that fear into their white supremacy and nativist agenda.

[W]hile the rhetoric of “environmental emergency” may inspire efforts to protect broad-based populations, it may also drive hoarding by the powerful and the exclusion of out-groups. In other words, the barriers that people may want to build to adapt to the realities of rising temperatures may include not only seawalls to hold back the rising tides, but also border walls to hold back the flood of humans fleeing the consequences of climate change, restricting economic development opportunities to white people, or perhaps even outright advocacy of genocide.¹³⁷

“Environmentalism—especially in its apocalyptic form” may not necessarily “spur progressive policies,” and is “readily compatible with sharply illiberal politics.”¹³⁸ Right-wing environmentalism may shape its environmental agenda to be “consistent with its nativist and hierarchical beliefs.”¹³⁹ Extreme right-wing politics has been, and most likely will continue to be, “virulently anti-immigrant” and may well respond to the increase of climate refugees with proposals to harden, or perhaps even militarize, the border to keep them out.¹⁴⁰ In fact, rhetoric, like “[w]e only have 11 years!” as a way to incite action “to avoid catastrophic social and economic collapse is just as likely to end in calls for practicing [Garrett Hardin’s] ‘lifeboat ethics,’”¹⁴¹ in which black and brown people are tossed over the side, as in any commitment “to an inclusive common future.”¹⁴² Given how right-wing extremist groups have used the rhetoric of a coming environmental apocalypse “to justify

¹³⁷ Gilman, *supra* note 63 (anticipating that global warming may well be used “to provide a powerful new set of justifications for the far-right policy program).

¹³⁸ *Id.*

¹³⁹ *Id.*

¹⁴⁰ *Id.*

¹⁴¹ *Id.*

¹⁴² *Id.*

and promote deeply illiberal or worse solutions to environmental issues,” the challenge for environmental advocates and government officials is “how to maintain a sense of focused urgency” without feeding that agenda.¹⁴³

Described as “the greening of hate,” “green nativism,” or even “population environmentalism,” white supremacists and other right-wing extremists “use[] language that conceals an agenda” that is “essentially about asserting a white American nativist cultural identity in the United States.”¹⁴⁴ A prominent white nationalist, David Lane, has put an ecological argument at the center of his case for white supremacy: “The environment is a concern to more and more of the folk today, and rightly so . . . Fifty to one hundred million Aryans could probably have the earth as a permanent paradise, but the industrialization of the third world . . . will quickly destroy the planet. To be blunt, it is either us or them.”¹⁴⁵ Another notorious example of this joinder of environmental policy and right-wing extremist rhetoric is Patrick Crusius, who perpetrated the August 2019 El Paso mass shooting.¹⁴⁶ Crusius justified his action in a “litany of environmental woes” with which many progressive thinkers would likely agree, albeit “to justify a very different ‘policy agenda.’”¹⁴⁷

Experts suggest “dial[ing] down some of the hyperbole” in the rhetoric about environmental dangers, like climate change.¹⁴⁸ It is possible not to discount the harms associated with something like climate change without losing a sense of optimism that solutions are possible.¹⁴⁹ Movies and many books describe extreme future events in a way that focuses on one far, unmitigated end of the probability distribution of what scientists actually predict.¹⁵⁰ Indeed, most scientists advocate that steps be taken now to avert doomsday—as one scientist put it, “[t]here are so many futures between doomed and fine.”¹⁵¹

¹⁴³ *Id.*

¹⁴⁴ *Id.* (quoting Rajani Bhatia, *Green or Brown? White Nativist Environmental Movements*, in HOME-GROWN HATE: GENDER & ORGANIZED RACISM 194 (ed. Abby L. Ferber 2004), <https://www.thekalazys.com/press/pdf/files/Home-Grown%20Hate%3B%20Gender%20and%20Organized%20Racism%20%28Perspectives%20on%20Gender%29.pdf>).

¹⁴⁵ Gilman, *supra* note 63.

¹⁴⁶ *Id.*

¹⁴⁷ *Id.*

¹⁴⁸ Plautz, *supra* note 91, at 18.

¹⁴⁹ *Id.*

¹⁵⁰ See, e.g., MAD MAX: FURY ROAD (Kennedy Miller Mitchell 2015); OCTAVIA BUTLER, PARABLE OF THE SOWER (1993); CLAIRE VAYE WATKINS, GOLD FAME CITRUS (2015); KIM STANLEY ROBINSON, NEW YORK 2140 (2017).

¹⁵¹ Plautz, *supra* note 91, at 18.

Experts worry about overemphasizing the scariness of future environmental harm to a point that one's audience, be it students, movie attendees, book readers, or the general public, becomes panicked and paralyzed by a sense of hopelessness. The gap between descriptions of a climate changed world and action to avert it may be due to "insufficient individual motivation for environmental protection and political constraints such as the influence on government decision-making of corporate and industrial lobbies."¹⁵² But, an equally plausible explanation of this rhetoric-behavior gap is that people are rejecting what they are hearing because the message makes them feel scared and helpless.

This same rhetoric-behavior gap could also motivate certain individuals to accept extreme right-wing rhetoric and solutions. For many people, the scary part of hearing a doomsday message is the feeling one can do nothing.¹⁵³ This sense of helplessness is compounded when one looks at the lack of response from the government and industry leaders. White supremacists and nativists offer action—there is something one can do; take action against the cause of the problem, non-whites and immigrants. There is even a sick, superficial logic to their message—since "[t]he average American isn't willing to change their lifestyle . . . the next logical step is to decrease the number of people in America using resources. If we can get rid of enough people, then our way of life can become more sustainable."¹⁵⁴ One knows who those people will be—not members of the white majority.

To counter this result may be as simple as making the future less scary and hopeless and adding to the message steps that individuals can take to avert that future. These steps may be as simple as turning off lights and monitoring the thermostat or as challenging as going car free. Even small steps by individuals and organizations can lessen or put off Armageddon.¹⁵⁵ The Children's Campaign Against Global Warming or student-led nonrenewable fuel divestiture campaigns at various universities around the world, such as in Great Britain, are further

¹⁵² Kopnina, *supra* note 24, at 240 (internal citations omitted).

¹⁵³ Plautz, *supra* note 91, at 20.

¹⁵⁴ Gilman, *supra* note 63 (quoting Patrick Crucius) (also quoting a Reddit commentator as saying, "if you believe in global warming, the obvious implications are that global migration must be shut down.").

¹⁵⁵ A version of this conclusion was echoed by the Supreme Court in *Massachusetts v. EPA*, 127 S. Ct. 1438, 1457 (2007) ("That a first step might be tentative does not by itself support the notion that federal courts lack jurisdiction to determine whether that step conforms to law.").

examples.¹⁵⁶ Getting people to accept responsibility for the harm they see and then to take action to lessen that harm may help give them a sense of control over the future. Although there are sporadic initiatives toward this end, doing this on a larger scale might counter the present message of hopelessness as well as reject the alternative actions white supremacists and nativists suggest.

CONCLUSION

The potential for violent action by anti-social groups, like white supremacists and nativists, who use the environment as a rationale for their actions is a growing reality. This Article posits that the use of frightening rhetoric around climate change has generated public fear and anxiety. These feelings are compounded by a sense of helplessness which leads people to search for simple solutions, like those offered by right-wing extremist groups. This Article proposes that modifying that rhetoric to make it less hysterical and hopeless may break that connection. A new, more nuanced message—that still acknowledges the threats posed by climate change unless steps are taken to avert or mitigate its eventuality—may actually be closer to the truth and may create a window of opportunity for people to engage in corrective behavior. As important from the perspective of this Article, the invitation for people to act may also lessen the appeal of right-wing extremists, who rely on a frightened, paralyzed public to garner support for their anti-social agenda.

¹⁵⁶ See, e.g., Matthew Taylor, *Half of UK Universities Have Committed to Divest from Fossil Fuel*, GUARDIAN (Jan. 13, 2020), <https://www.theguardian.com/environment/2020/jan/13/half-of-uk-universities-have-committed-to-divest-from-fossil-fuel>.