

January 20, 2025  
Dear Mr. McDaniel,

The undersigned 185 organizations, collectively representing hundreds of thousands of members in California, across the United States, and around the world, in solidarity with dozens of individuals, submit these comments strongly opposing the Golden State Natural Resources (GSNR) wood pellet project. After reviewing the draft environmental impact report (DEIR) prepared by the Golden State Finance Authority (GSFA) under the California Environmental Quality Act (CEQA), we are concerned that the project would inflict irrevocable harm to our climate, communities, and forests. **The DEIR is inadequate and should not be certified, and the project should be rejected.**

The analysis included within the DEIR is woefully insufficient, lacking critical details, and riddled with inaccuracies. But even based on GSFA's own analysis in the DEIR, **this project is rife with "significant" adverse impacts.** GSNR's facilities will spark a massive, long-term demand for timber harvesting to support production of wood pellets—threatening devastating impacts on forests, wildlife habitat, and biodiversity. Further, cutting forests and producing wood pellets for international export and combustion in power plants would worsen the climate crisis. Cutting and trucking trees and the production, transportation and storage of pellets would also cause substantial air pollution, noise, and other impacts on communities across California that already shoulder unacceptable levels of pollution.

The claim that this project is necessary for mitigating wildfire risk is wholly unsupported. While addressing wildfires is a compelling need, mitigation can be achieved without the massive emissions and adverse community and wildlife impacts that would come from this project. Furthermore, GSNR plans to partner with a company that has a long track record of environmental violations. As the impact of climate change and risk of destructive wildfires grows more urgent every year, California has no time to waste. California must reject GSNR's false solution.

### **1. Unacceptable community impacts**

GSNR proposes to build two of the country's largest wood pellet production facilities and ship the pellets overseas to Europe and Asia, where they would be burned in converted coal-fired power plants to produce electricity. For the Californian communities of Lassen and Tuolumne counties, where the wood pellet mills will be built and operated, and Stockton, where the wood pellets would be stored and exported, there are many impacts GSFA considers "significant and unavoidable." At the facility in Lassen, which would churn out 700,000 tons of wood pellets every year, GSFA admits that the project's emissions would exceed air pollution control district limits for dangerous air pollutants like particulate matter (PM10 and PM2.5), nitrogen oxide

(NO<sub>x</sub>), and carbon monoxide (CO).<sup>1</sup> In doing so, the project will conflict with Lassen County’s air quality plans.<sup>2</sup> The Tuolumne County facility would also conflict with air quality plans, exceeding the annual threshold for CO.<sup>3</sup> Emissions of toxic air contaminants will pose serious cancer risks to nearby residents. Indeed, the DEIR found that the GSNR facility-induced individual cancer risk in Lassen County is more than double CEQA’s threshold of significance, and in Tuolumne County is more than four times greater than the CEQA significance threshold, even after mitigation.<sup>4</sup> Finally, at the wood pellet storage and export terminal at the Port of Stockton, the project would create significant NO<sub>x</sub> impacts<sup>5</sup>—as well as cumulatively significant PM<sub>2.5</sub> (fine soot) impacts in an area that is already failing national standards for PM<sub>2.5</sub>.<sup>6</sup> **California’s leaders should be figuring out ways to clean up this already unacceptable air pollution and deny this project that would *exacerbate* existing burdens.**

## **2. Inadequate and counterproductive wildfire mitigation**

GSFA believes these “significant and unavoidable” community impacts are justified by its purported objective of wildfire mitigation and forest resilience. However, GSFA fails to demonstrate that the project would mitigate wildfire risk or improve forest resiliency. Rather, the project could well exacerbate the very issues they are trying to address. The proposed logging activity will largely occur in remote areas far from communities, instead of focusing on vegetation management directly in and around communities where it would do the most to reduce wildfire risk to communities. Furthermore, while the DEIR claims that the project would result in increased management of dense forests to address wildfire risk, it categorized only 27% of the project area’s forests as “overcrowded”<sup>7</sup> and an even smaller amount—15.5%—of the project area consists of high-density stands.<sup>8</sup> Even more tellingly, ~90% of forests that would be

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<sup>1</sup> Table 3.2-40 Estimated Maximum Daily Operation Criteria Air Pollutant Emissions - Lassen Facility and Project Activities within Lassen County APCD - Mitigated, DEIR 3-2-120–21.

<sup>2</sup> Lassen County Air Pollution Control District, Rule 6.4 New Source Siting Requirements.

<sup>3</sup> Table 3.2-51 Estimated Annual Operation Criteria Air Pollutant Emissions- Tuolumne Facility & Project Activities within Tuolumne County APCD – Mitigated, DEIR 3.2-137–38.

<sup>4</sup> Tables 3.2-74 Lassen Facility Operation Health Risk Assessment Results – Mitigated, DEIR 3.2-176, and 3.2-80 Tuolumne Facility Operation Health Risk Assessment Results – Mitigated, DEIR 3.2-181.

<sup>5</sup> Table 3.2-60 Estimated Annual Operation Criteria Air Pollutant Emissions – Port of Stockton and Project Activities within San Joaquin Valley APCD – Mitigated.

<sup>6</sup> California Air Resources Board, Review of the San Joaquin Valley 2024 Plan for the 2012 12 µg/m<sup>3</sup> Annual PM<sub>2.5</sub> Standard and Amendments to the Agricultural Equipment Incentive Measure and the 1997 15 µg/m<sup>3</sup> State Implementation Plan Revision, (2024) (“The San Joaquin Valley Air Basin (San Joaquin Valley or Valley) is classified under the [Clean Air] Act as a serious nonattainment area for the 12 µg/m<sup>3</sup> annual PM<sub>2.5</sub> standard.”). The DEIR falls short in addressing cumulative and social impacts too, which is critical given Stockton’s designation as an AB 617 community and disadvantaged community.

<sup>7</sup> Table 3.7-1, DEIR 3.7-7.

<sup>8</sup> Appendix B8 Carbon Forest Change Analysis, 1.1.3 Forest Density, X-2–3.

“thinned” as part of the project are outside of high density areas,<sup>9</sup> where the DEIR states that treatment effects would be diminished.<sup>10</sup>

Furthermore, significant aspects of the project demonstrate that wildfire resilience and forest restoration are far from being the primary drivers to sustain this project. GSFA’s proposed facilities in Tuolumne and Lassen counties will increase the pace and scale of logging in the state due to the need to feed mills that would produce 1,000,000 tons of wood pellets every year. Nearly half of the logging would be *additional*: it “would not occur without GSNR’s proposed project” and would log “otherwise merchantable roundwood.”<sup>11</sup> Trees up to 10½ feet in circumference—which provide essential wildlife habitat, carbon storage, and numerous other benefits<sup>12</sup>—would be cut down and turned into pellets.<sup>13</sup> This underscores that this is primarily a pellet production project with some incidental fuel reduction components.

There are much better ways to address wildfire risk and forest resilience. The best available science shows that wildfire is a natural and necessary ecological process in California forests, and that prescribed burns and cultural burning based on traditional ecological knowledge can be useful practices to restore resilience.<sup>14</sup> Further, the best way to protect communities from wildfires is to invest in proven fire-safety retrofits,<sup>15</sup> home hardening,<sup>16</sup> evacuation planning and assistance, increasing access to air filters, and vegetation work in the defensible space immediately surrounding homes and along critical egress and access routes.<sup>17</sup>

### 3. Problematic incentives and collaborators

The project’s high costs will result in forest management driven by economic considerations, rather than ecological ones. The two industrial-scale facilities and one export terminal will cost

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<sup>9</sup> *Id.* at X-6.

<sup>10</sup> *Id.* at X-2 (“[H]igh density stands may experience great benefits from fuels reduction/thinning treatments due to substantial reductions in tree-tree competition for resources. However, treatments in lower density stands may result in less substantial effects given their already present condition of low tree-tree competition.”).

<sup>11</sup> DEIR ES-1.

<sup>12</sup> See, e.g., James A. Lutz et al., *Ecological Importance of Large-Diameter Trees in a Temperate Mixed-Conifer Forest*, 7 PLOS ONE e36131 (2012).

<sup>13</sup> DEIR Tables 2-1 and 2.6, specifying roundwood feedstocks up to 40 inches diameter (equals 10.5 feet circumference); DEIR at 2-15 listing exceptions to 30 inch DBH limit

<sup>14</sup> See, e.g., Dominick A. DellaSala et al., *Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus?*, 268 *Biological Conservation* 109499 (2022). <https://doi.org/10.1016/j.biocon.2022.109499>.

<sup>15</sup> See, e.g., Jack Cohen, A More Effective Approach for Preventing Wildland-Urban Fire Disasters, <https://tinyurl.com/4s4es3vw>; National Institute of Building Sciences, Mitigation Saves up to \$13 per \$1 Invested, [https://www.nibs.org/files/pdfs/ms\\_v4\\_overview.pdf](https://www.nibs.org/files/pdfs/ms_v4_overview.pdf). For a case study highlighting the benefits of home retrofitting for wildfire protection, see FEMA, Mitigation Measures May Have Saved Lahaina’s ‘Miracle’ Home, <https://www.fema.gov/case-study/mitigation-measures-may-have-saved-lahainas-miracle-home>.

<sup>16</sup> See, e.g., David E. Calkin et al., *Wildland-urban fire disasters aren’t actually a wildfire problem*, 120 PNAS e2315797120 (2023), <https://doi.org/10.1073/pnas.2315797120>.

<sup>17</sup> See, e.g., Alexandra D. Syphard et al., *The role of defensible space for residential structure protection during wildfires*, 23 *Int’l J. Wildland Fire* 1165 (2014), <https://doi.org/10.1071/WF13158>.

well over half a billion dollars. GSFA will be pressed to recoup costs for themselves, investors, and debtors, and will likely find that what benefits their bottom line is not what is best for forest and community health. The biomass industry's shoddy track record in the Southeastern United States and Canada provide additional cause for community concern that profit will win out over all, even legal stringent air quality protections.

This risk is even more glaring given GSNR's partnership with Drax, a United Kingdom-based company that is the world's largest bioenergy producer and second-largest wood pellet manufacturer.<sup>18</sup> Alarming, Drax has a proven track record of exacerbating climate change,<sup>19</sup> harming rural communities,<sup>20</sup> and devastating forest ecosystems throughout North America.<sup>21</sup> Drax's burning of wood pellets back home in the United Kingdom emitted 11.5 million tons of CO<sub>2</sub> in 2023,<sup>21</sup> the equivalent of 2,673,805 gas-powered passenger vehicles driven for one year.<sup>22</sup> In 2022, Drax topped the list as the U.K. power sector's single-largest CO<sub>2</sub> emitter.<sup>24</sup> Drax-owned wood pellet production facilities in the U.S. Southeast and Canada bring dust,<sup>25</sup> noise,<sup>26</sup> and other negative impacts, including the perpetuation of decades of disproportionate environmental impacts on poor and rural communities.<sup>26</sup> Drax also has a history of violating environmental laws designed to protect community health. Most notably, in 2020, regulators fined Drax \$2.5 million over serious air quality breaches at its pellet mill in Gloster, Mississippi.<sup>28</sup> But this is just the tip of the iceberg: Drax's wood pellet facilities have been found violating environmental regulations **over 11,000 times** according to an investigation for *The*

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<sup>18</sup> In January 2024, Drax and GSNR signed a memorandum of understanding concerning access to global markets. GSNR, Board of Directors Meeting, (Feb. 28, 2024) 7–14,

[https://www.rcrcnet.org/sites/default/files/useruploads/Meetings/Misc/2024/2.28.2024\\_GSNR\\_BOD\\_Packet.pdf](https://www.rcrcnet.org/sites/default/files/useruploads/Meetings/Misc/2024/2.28.2024_GSNR_BOD_Packet.pdf).

<sup>19</sup> Tom Harrison & Harriet Fox, *Biomass plant is UK's top emitter*, Ember (2023), <https://ember-energy.org/app/uploads/2024/10/Biomass-plant-is-UKs-top-emitter.pdf> ("Drax tops the list as the UK power sector's single largest CO<sub>2</sub> emitter, despite generating only a small share of power.").

<sup>20</sup> James L. VanHise, *The Wood Pellet Industry: A Dual Threat to Poor, Rural Communities*, RESILIENCE, Aug. 25, 2023, <https://www.resilience.org/stories/2023-08-25/the-wood-pellet-industry-a-dual-threat-to-poor-rural-communities/> <sup>21</sup> Joe Crowley, *Drax: UK power station still burning rare forest wood*, BBC Panorama, Feb. 27, 2024, <https://www.bbc.com/news/science-environment-68381160>.

<sup>21</sup> Drax Group plc, Committed to the World's Energy Transition, 50. (2024), . Annual report and accounts 2023. Drax. Retrieved December 6, 2024, from [https://www.drax.com/wp-content/uploads/2024/03/Drax\\_AR23\\_Interactive.pdf](https://www.drax.com/wp-content/uploads/2024/03/Drax_AR23_Interactive.pdf) (reporting total Biogenic CO<sub>2</sub> emissions of 11,463 ktCO<sub>2</sub>e); <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator#results> See pg 50, Biogenic CO<sub>2</sub> emissions

<sup>22</sup> EPA, Greenhouse Gas Equivalencies Calculator, <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>.

<sup>23</sup> Harrison & Fox, *supra* note 18.

<sup>24</sup> Ruby Bell et al., Pellet Mill Community Impact Survey 17 (2024), [https://www.southernenvironment.org/wp-content/uploads/2024/10/Biomass\\_Report\\_0924\\_F.pdf](https://www.southernenvironment.org/wp-content/uploads/2024/10/Biomass_Report_0924_F.pdf).

<sup>25</sup> *Id.*; E. D. Walker et al., *Amplifying concerns: An Exploration of Community Noise Levels in Rural Communities Impacted by Wood Pellet Production*, 17 ENVIRONMENTAL CHALLENGES 101024 (2024).

<sup>26</sup> Sara Sneath, Mississippi biomass facility fined for emitting three times more air pollution than permitted, Southerly, Feb. 25, 2021, <https://southerlymag.org/2021/02/25/mississippi-biomass-facility-fined-for-emitting-three-times-more-air-pollution-than-permitted/>; Danielle Purifoy, *As the Wood Pellet Industry Grows Across the South, Enviva Targets Alabama and Mississippi for Future Expansion*, SCALAWAG, Oct. 5, 2020, <http://scalawagmagazine.org/2020/10/wood-pellet-environmental-racism-part-two/>. <sup>28</sup> Grant McLaughlin, *MDEQ settles with UK-based Drax Group for air violations at Gloster plant*, Clarion Ledger, Sep. 17, 2024, <https://www.clarionledger.com/story/news/politics/2024/09/17/mdeq-settles-with-drax-group-for-air-pollution-violations-in-gloster/75247217007/>.

*Times*.<sup>27</sup> Since 2020, they have violated environmental regulations on average **5 times per day**.<sup>30</sup> These violations show what very well could be the future of communities that will live with GSNR-Drax facilities.

#### 4. Contribution to climate catastrophe

Finally, this project does not make sense as “climate mitigation.” The project would release substantial climate-heating greenhouse gas emissions at every stage, worsening the climate crisis. The project would significantly increase logging of California’s forests, releasing their stored carbon at a time when we must increase forest protection and forest carbon storage. Older trees store more carbon than young growth<sup>28</sup> so, harvesting wood leads to “forgone” sequestration: carbon storage that would have occurred over time in the uncut forest but never materializes.<sup>32</sup> This loss occurs even when accounting for regrowth of the new forest.<sup>29</sup> Significant greenhouse gas emissions and air pollution would also be emitted from the long biomass energy production process: trucking cut trees long distances in hundreds of daily trips, chipping wood and producing pellets, transporting pellets by truck or rail hundreds of miles to ports, then shipping pellets overseas to Asia and Europe, and finally burning the wood pellets in power plants.<sup>30</sup> There is a scientific consensus in the U.S. and internationally that burning wood is not carbon neutral. Rather, peer-reviewed literature demonstrates in the “vast majority” of cases, burning forest biomass for energy creates a “carbon debt,” meaning a net emissions increase to the atmosphere,<sup>31</sup> even when accounting for purported land-based mitigating factors such as forest regrowth. This is true even if GSNR limited itself to only using forest residuals from thinning projects that would occur anyway.<sup>32,33</sup> Numerous studies show that it takes decades to a century or more for cut forests to re-sequester the amount of carbon emitted from logging and burning

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<sup>27</sup> Camille Corcoran, *US Plants Supplying UK Power Station Broke Green Rules 11,000 Times*, *The Times*. Nov. 3, 2024, <https://www.thetimes.com/uk/environment/article/us-plants-supplying-uk-power-station-broke-green-rules-11000-times-2q559pwrg>.

<sup>30</sup> *Id.* (finding “more than 8,700” violations “since the start of 2020”).

<sup>28</sup> N. L. Stephenson et al., *Rate of Tree Carbon Accumulation Increases Continuously with Tree Size*, 507 *Nature* 90–93 (2014); Michael Köhl et al., *The Impact of Tree Age on Biomass Growth and Carbon Accumulation Capacity: A Retrospective Analysis Using Tree Ring Data of Three Tropical Tree Species Grown in Natural Forests of Suriname*, 12 *PLOS ONE* e0181187 (2017). <sup>32</sup> Sean L. Maxwell et al., *Degradation and Forgone Removals Increase the Carbon Impact of Intact Forest Loss by 626%*, 5 *Science Advances* eaax2546 (2019).

<sup>29</sup> Sasha Stashwick et al., *NRDC, A Bad Biomass Bet 3* (2021), <https://www.nrdc.org/sites/default/files/bad-biomass-bet-beccs-ib.pdf>.

<sup>30</sup> *Id.*

<sup>31</sup> John Gunn et al., *Spatial Informatics Group-Natural Assets Laboratory, Scientific Evidence Does Not Support the Carbon Neutrality of Woody Biomass Energy: A Review of Existing Literature*, *Spatial Informatics Group Report 2018-01* (2018), [https://www.sig-nal.org/\\_files/ugd/f5c52e\\_a51f246c8a854cf594ce47e6d05d9616.pdf](https://www.sig-nal.org/_files/ugd/f5c52e_a51f246c8a854cf594ce47e6d05d9616.pdf).

<sup>32</sup> Mary Booth, *Not Carbon Neutral: Assessing the Net Emissions Impact of Residues Burned for Bioenergy*, 13 *Env't Rsch. Letters*

<sup>33</sup> (2018); Ana Repo et al., *Sustainability of Forest Bioenergy in Europe: Land-Use-Related Carbon Dioxide Emissions of Forest Harvest Residues*, 7 *GCB Bioenergy* 877–87 (Mar. 2014); Niclas Scott Bentsen, *Carbon Debt and Payback Time—Lost in the Forest?*, 73 *Renewable & Sustainable Energy Rev.* 1211–17 (2017).

woody biomass for energy.<sup>34</sup> **As admitted by the DEIR, the carbon emissions from this project would be significant and conflict with meeting California’s climate goals.**

## 5. Unacceptable Harms to Wildlife and Ecosystems

This massive project poses unacceptable harms to wildlife and ecosystems. The enormous ramp-up of logging/thinning across the vast project area will destroy and degrade wildlife habitat, threatening the future of imperiled and sensitive species. According to the DEIR, 843 special-status species occur or have the potential to occur within the project area,<sup>35</sup> including many federally or state listed species such as the Northern spotted owl, great gray owl, fisher, Humboldt marten, gray wolf, Sierra Nevada red fox, and wolverine, as well as the California spotted owl proposed for federal listing.<sup>39</sup> The project area encompasses critical habitat for 30 federally listed species, including 20 animal and 10 plant species.<sup>36</sup> Among many flaws, the DEIR does not consider the cumulative impacts to special-status species that would result from the project’s massive ramp-up of logging/thinning. The construction and operation of the pellet production facilities would cause additional harms such as the destruction of 40+ acres of wetlands at the Lassen pellet facility<sup>37</sup> and impacts to the Stanislaus monkeyflower and other rare plants at the Tuolumne pellet facility<sup>38</sup>. At the Port of Stockton, the DEIR failed to consider or mitigate the foreseeable impacts to marine wildlife of the 29 massive tanker ships that will be transporting pellets each year.<sup>39</sup>

The DEIR demonstrates the project will have significant detrimental impacts on communities, the climate, forests and wildlife. That is why civil society organizations have strongly opposed the project not once<sup>40</sup> but twice,<sup>41</sup> and the local communities that stand to be most impacted are calling out the project’s justifications as hollow at best.<sup>42</sup> The climate crisis requires us to value standing forests for the carbon they sequester and store.<sup>43</sup> Communities that face overwhelming

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<sup>34</sup> John Sterman et al., *Does wood bioenergy help or harm the climate?*, 78 Bulletin of the Atomic Scientists 128 (2022)

<sup>35</sup> DEIR 3.3-65 (“643 special status plant species have potential to occur in the working area”); DEIR 3.3-68 (“200 special status wildlife species known or with potential to occur in the working area”) <sup>39</sup> DEIR Table 3.3-14.

<sup>36</sup> DEIR 3.3-93 (“There is critical habitat designed for 30 federally listed plant (10) and wildlife (20) species in the working area”).

<sup>37</sup> DEIR 3.3-101.

<sup>38</sup> DEIR 3.3-67; Appendix A at 92.

<sup>39</sup> DEIR 3.3-108.

<sup>40</sup> Scoping Comments on GSNR Wood Pellet Project First NOP. (December 19, 2022), <https://www.biofuelwatch.org.uk/wp-content/uploads/22-12-19-CBD-PFPI-Biofuelwatch-et-al-scoping-comments-on-GSNR-wood-pellet-project-final.pdf>.

<sup>41</sup> Scoping Comments on GSNR Wood Pellet Project Reissued NOP. (June 30, 2023), <https://www.pfpi.net/wp-content/uploads/2023/06/JointScopingCommentsonGSNRWoodPelletProject63023.pdf>.

<sup>42</sup> Press Release, Biofuels Watch and PFPI, Groups call on California officials to axe the GSNR wood pellet project. (June 30, 2023), <https://www.pfpi.net/wp-content/uploads/2023/06/NewsRelease-GSNRwoodpelletprojectsign-onletter63023.pdf>.

<sup>43</sup> Jennifer Skene, NRDC, The true cost of undervaluing our forests, (2023), <https://www.nrdc.org/bio/jennifer-skene/true-cost-undervaluing-our-forests>.

pollution burdens deserve better than more of the same. GSNR's stated goals may sound lofty and ideal, but they actually pose an imminent threat to our climate, biodiversity, and communities, and they are nothing more than another biomass boondoggle.

Signed,

**Local Organizations**

Catholic Charities of Stockton

Ector Olivares, Program Manager- Environmental Justice

InnerG

Kristy Lauron, Community Auntie, Creative Director, Educator, Published Author

Little Manila After School Program

Jerick Lazaro

Little Manila Rising

Gloria Alonso, Environmental Justice Advocacy Coordinator

Restore The Delta

Barbara Barrigan Parrilla, Executive Director

The Greenlining Institute

Morokot Uy, Program Manager of Capacity Building

Tree Stockton Foundation

Julie Dunning, Board President

Valley Improvement Projects

Matt Holmes, North Valley Projects Director

Sierra Club, Mother Lode Chapter

Sean Wirth, Chapter chair

Ebbetts Pass Forest Watch

Perry Metzger, President

Mount Shasta Bioregional Ecology Center

Nick Joslin, Forest and Watershed Watch Program Manager

Shasta Environmental Alliance  
David Ledger, President

We Advocate Thorough Environmental Review  
Frank Toriello, President

Sunflower Alliance  
Janet S. Johnson, Co-Coordinator

**California organizations**

350 Bay Area  
Valerie Ventre-Hutton, Policy Analyst

350 Bay Area Action  
Nicholas J Ratto, Transportation team lead

350 East Bay  
Jack Lucero Fleck, Co-Lead

350 Humboldt  
Daniel Chandler, Ph.D., Steering Committee Member

350 Sacramento  
Will Brieger, Chair, Legislation & Policy Team

350 Sonoma  
Christine Hoex

Battle Creek Alliance & Defiance Canyon Raptor Rescue  
Marily Woodhouse, Director

Bay Area Clean Air Coalition  
Kristel Rietesel, Administrator

Benicians for a Safe and Healthy Community  
Pat Toth-Smith, Administrator

California Chaparral Institute



Richard W. Halsey, Director

California Environmental Justice Coalition  
Matt Holmes, Strategy Director

California Nurses for Environmental Health and Justice  
Barbara Sattler, Leadership Council

California River Watch  
Larry Hanson, President

Alta Peak Chapter, California Native Plant Society  
Barbara Brydolf, President

Bay Area-System Change not Climate Change  
David F. Gassman, co-convenor

Cape Ann Climate Coalition and Elders Climate Action  
Marcia F Hart, RN

California Environmental Justice Coalition (CEJC)  
Thomas Helme, Coordinator

Central California Environmental Justice Network  
Nayamin Martinez, Executive Director

Central Valley Air Quality Coalition  
Catherine Garoupa, Executive Director

Center for Community Action and Environmental Justice (CCA EJ)  
Marven Norman, Policy Coordinator

Citizens Climate Lobby San Mateo County  
Elaine Salinger, Chapter leader

Climate Action California  
Janet Cox, CEO

Coalition Advocating for Pesticide Safety

Raul Garcia, Organizer

Coalition to Save Jackson State Forest  
Andy Wellspring

Conservation Congress  
Denise Boggs, Director

Earth Neighborhood Productions  
Karen Ashikeh LaMantia, Owner and Manager

Elders Climate Action (ECA) Northern California (NorCal) Chapter  
Todd Weber, Chapter Co-Leader

Elders Climate Action (ECA) Southern California (SoCal) Chapter  
Richard Burke, Chapter Leader

Endangered Habitats League  
Dan Silver, Executive Director

Environmental Protection Information Center (EPIC)  
Tom Wheeler, Executive Director

Feather River Action!  
Joshua Hart, Spokesperson

Friends of Gualala River  
Nathan Ramser, President

Forests Forever  
Paul Hughes, Executive Director

Forest Unlimited  
Larry Hanson, President

GeoPraxis  
Thomas P Conlon, Principal

Good Neighbor Steering Committee of Benicia

Kathy Kerridge, Board member

Healing Living Systems, Inc.  
Theodosia Hamilton Ferguson, Founder, CEO

Kahl Consultants  
Alex Kahl, Owner

Klamath Forest Alliance  
Kimberly Baker, Executive Director

Maternal and Child Health Access  
Lynn Kersey, Executive Director

North Coast Chapter California Native Plant Society  
Joann Kerns, Conservation Chair

Northcoast Environmental Center  
Sable Odry, Advocacy Co-Director

Pacific Environment  
Fern Uennatornwarangoon, Climate Campaign Director, Ports

Placer Group, Sierra Club  
Harry White

Protect Wild Petaluma  
Taryn Obaid, Advisor

San Fernando Valley Chapter Climate Reality Project  
Sherrell Cuneo, Legislative Co-chair  
Sierra Club California  
Mahtisa Djahangiri, Campaign Strategist

Sonoma County Climate Activist Network (SoCoCAN!)  
Maya Khosla, Member

Récolte Energy  
Gopal Shanker , President

Santa Cruz Climate Action Network  
Pauline M Seales, Organizer

The Climate Alliance  
Magi Amma, President

The Climate Reality Project: California Coalition  
Andy Hattala, Policy Co-Lead

The Phoenix Group  
Manuel J. Espinosa, Principal

West Berkeley Alliance for Clean Air and Safe Jobs  
Janice Schroeder

**Organizations from around the U.S.**

2 Degrees Northampton  
Nicholas Warren

350 Eugene  
Patricia Hine, President

350PDX  
Brenna Bell, Forest Climate Manager

350 Salem, Oregon  
Philip H. Carver, Ph.D, Co-coordinator

350 Seattle  
David Perk, Civic Action Team - Forestry

Athens County's Future Action Network  
Heather Cantino, Steering Committee Chair

Bee Friendly Williamstown  
Anne O'Connor, Co-Chair

Biomass Working Group, PNW Forest Climate Alliance

David Perk

Bullitt Countians for Justice  
Christy M Collins

Cascadia Climate Action Now  
Sally Keely, Founder

Center for Responsible Forestry  
Brel Froebe, Executive Director

Central/Eastern Oregon Chapter of Great Old Broads for Wilderness  
Mary Fleischmann, Leader

Change the Chamber  
Sarah Hill

Citizens for a Clean Harbor  
Tammy Domike, Community Organizer

Climate Communications Coalition  
Sonia Demiray, Executive Director

Climate Writers  
Ernest O'Byrne

Coastal Plain Conservation Group  
Andy Wood, Director

Communitas Financial Planning  
Jim Frazin, CEO

Conscious Choices for All  
B Cretilli, Owner & California Resident

Dogwood Alliance  
Adam Colette, Program Director

Domini Impact Investments, LLC

Mary Beth Gallagher, Director of Engagement

Earth Ethics, Inc.

Mary Gutierrez, Director

Earth Law Center

Elizabeth Dunne, Director of Legal Advocacy

Education, Economics, Environmental, Climate and Health Organization (EEEECHO)      Ruth  
Story, Executive Director

Elwha Legacy Forests Coalition

Wendy Rae Johnson

Families Advocating for Chemical & Toxics Safety (FACTS)

Lendri Purcell, President

FCCPR Climate Task Force

Bob Armstrong, Co-Chair

Figure 8 Investment Strategies

Ahmed Aljuboori, Associate of Investment Research

FOGH (Friends of Grays Harbor)

Arthur (R.D.) Grunbaum, President

Friends of the Notch Forest

Lori Bradley, Lead Coordinator

Global Energy Monitor

Sophia Bauer, Bioenergy Power Project Manager

Green Action for Health and Environmental Justice

Bradley Angel, Executive Director

Green America

Dan Howells, Climate Campaigns Director

Hartford County Climate Action

Pamela Dehmer, Co-President

Heartwood Council  
Michael L Feisthammel

Institute for Policy Studies Climate Policy Program  
Basav Sen, Climate policy Director

John Muir Project  
Jennifer Mamola, Policy and Advocacy Director

Kentucky Heartwood  
Amethyst Muncy

Kettle Range Conservation Group  
Timothy Coleman, Executive Director

KS Wild  
George Sexton , Conservation Director

League of Women Voters of Sno.Co.  
Rita Ireland

Maryland Latinos Unidos  
Carlos A Orbe, Jr., Public Affairs Specialist

Massachusetts Forest Watch  
Chris Matera, Founder

Mighty Earth  
Amanda Hurowitz, Senior Director, Forest Commodities Melrose UU Church Climate Action  
Team  
Dan Franklin, Chair

Natural Investments PBLLC

NC Climate Solutions Coalition  
Anita Cunningham, Executive Director

Non-Toxic Neighborhoods  
Kim Konte, Founder

Oil and Gas Action Network  
Leah Redwood, California Organizer

North Parish of North Andover Climate Justice Group  
Karen Martin, Lead

NRDC  
Rita Vaughan Frost, Forest Advocate

Nuclear Information and Resource Service  
Timothy Judson, Executive Director

Oregon Chapter Sierra Club  
Damon Motz-Storey, Chapter Director

Oregon Unitarian Universalist Voices for Justice  
Sue Craig, President

Organized Uplifting Resources & Strategies (OURS)  
Commissioner and Dr. ErNiko Brown, Founder, President, & CEO

Owen-Putnam Friends of the Forest  
Lora Kemp, Chairperson

Partnership for Policy Integrity  
Laura Haight, U.S. Policy Director

Pivot Point  
Peter Riggs, Director

Progressive Democrats of America, Oregon Chapter  
David Alba, State Coordinator

Protect Our Woods  
Andy Mahler, Director



Presente.org  
Matt Nelson

Rachel Carson Council  
Robert K. Musil, Ph.D., M.P.H., President and CEO

Resist the Pipeline  
James Michel, Co-Founder

Resource Renewal Institute  
Chance Cutrano, Programs Director

RESTORE: The North Woods  
Michael Kellett, Executive Director

Rivers & Mountains GreenFaith  
John Seakwood

Thurston Climate Action/Tree Action Group  
J.Lindsey

Tualatin Riverkeepers  
Eve Goldman, Staff Attorney

Soda Mountain Wilderness Council  
Dave Willis, Chair

Sequoia ForestKeeper  
Ara Marderosian, Board Secretary

Seven Capes Bird Alliance  
Joseph Youren, Forest Issues Director

Sisters of St. Dominic of Blauvelt, NY  
Sr. Joan Agro, OP, Congregational Secretary

Southern Forests Conservation Coalition  
John R. Spruill

Standing Trees  
Mark Nelson, Board Chair

StopVTBiomass  
Ashley Adams , Organizer

Sustainable Advisors Alliance, LLC  
Julie Skye, Member, CCO

The Enviro Show  
Don Ogden, Co-Founder/Co-Host

The Vocal Seniority  
Gail Sabbadini

Toxic Free North Carolina  
Alexis Luckey, Executive Director

Transformative Wealth Management, LLC  
Dr. Allan W Moskowitz CFP, AIF

Umpqua Natural Leadership Science Hub  
Cindy Haws, President

Upper Valley Affinity Group  
Geoffrey Gardner

Vermonters for a Clean Environment  
Annette Smith, Executive Director

Wendell State Forest Alliance  
Laurel Facey, Secretary

Wild Nature Institute  
Monica Bond, PhD, Principal Scientist

Wild Heritage, a Project of Earth Island Institute  
Dr. Dominick A. DellaSala, Chief Scientist

Wild Orca  
Deborah Giles, PhD, Science and Research Director

Williams Community Forest Project  
Cheryl Bruner, Secretary

**Organizations from around the world**

Axe Drax  
Rosie Gloster, Co-founder

Biofuelwatch  
Gary Hughes, Co-Director / Americas Program Coordinator Biomass Action Group  
Shaunti Kiehl .

Comité Schone Lucht  
Fenna Swart, Chair

Earth Thrive  
Zoe Lujic

Ei polteta tulevaisuutta  
Varpu Sairinen, Campaign Coordinator

Environment East Gippsland inc  
J Redwood, Coordinator

EPN's Biomass Action Network  
Sophie Bastable

Environmental Paper Network - North America  
Elizabeth Underwood, Director

Fern  
Martin Pigeon, Forests & Climate Campaigner

Fundacion Chile Sustentable  
Sara Larrain, Directora

Global Justice Ecology Project

Anne Petermann, Executive Director

Landelijk Netwerk Bos- en Bomenbescherming  
Marjan Houpt, Co-Founder

Leefmilieu  
Maarten Visschers, Secretary

MARBE SA, Costa Rica  
Madeline Kiser

Mobilisation for the Environment  
Johan Vollenbroek, Chair

Nature Nova Scotia  
Bob Bancroft, President

NOAH Friends of the Earth Denmark  
Tobias Jespersen, Researcher

Oil Change International  
Allie Rosenbluth, US Campaigns Manager

ONG Impacta Positivo  
Lorena Garrido, Socia Activa

ROBIN WOOD  
Jana Ballenthien, Forest Campaigner

Rubicon Forest Protection Group Inc  
Beverley Dick, President

Sisters of Mary Reparatrix  
Sister Ann Kasperek

Stop Burning Trees Coalition  
Merry Dickinson, Lead Campaigner

Trend Asia

Yuyun Indradi, Executive Director

Wild Europe Foundation  
Toby Aykroyd, Director

Women's Earth and Climate Action Network (WECAN)  
Osprey Orielle Lake, Executive Director

### **Individuals**

Kristin Mercer, Belmont, CA  
Jean Tepperman, Berkeley, CA  
Evan Frost, Bishop, CA  
Tonja Y Chi, Wildlife Biology and Ecology, M. S., Campbell, CA  
Luke Zaelke, Chatsworth, CA  
Karen Preuss, Cotati, CA  
Sandra Portillo-Robins, El Cerrito, CA  
Phyllis Glassman, Greenbrae, CA  
Shanyn Avila, Modesto, CA  
Margaret Bollock, Santa Cruz, CA  
Jacquelyn Griffith, Santa Cruz, CA  
Jessica Murray, Santa Cruz, CA  
Kyle Walters, Santa Cruz, CA  
Mary Elizabeth, M.S., R.E.H.S., Stockton, CA  
Charis Guerzo, Stockton, CA  
Yesenia Lupian, Stockton, CA  
Alycia Raya, Stockton, CA  
Daniel Richardson, Stockton, CA  
Lisa Richardson, Stockton, CA  
Scott Mattoon, Stockton, CA  
Kezia Udell, Stockton, CA  
Dee Boyle-Clapp, Florence, MA  
Brittany Gravely, Jamaica Plain, MA  
Lynne Man, Lunenburg, MA  
Kate O'Connor, Northampton, MA  
Miriam Kurland, Williamsburg, MA  
Mike Kurland Williamsburg, MA  
Andrew Hinz, Baltimore, MD  
Joann C Watts Moore, Boyds, MD  
Marjorie Winslow, Crownsville, MD

Ann Andrex, Frederick, MD  
Mary Harris, Rolla, MO  
Mariana Rufin , New York, NY  
Sean Hixon, Albany, OR  
Sierra Farris, Ashland, OR  
Jindra Brandejska, Corvallis, OR  
Martha Dragovich, Eugene, OR  
Kurt Reuter, Eugene, OR  
Jere C. Rosemeyer, Eugene, OR  
Reverend Stephen Dietrich, Waldport, OR  
Kenneth J Lederman, Arlington, VA  
Karen Horn, Vergennes, VT  
Laura Simon, Wilder, VT  
Brooks Bennett, Bothell, WA  
Kate Lunceford, Bothell, WA  
Dr. Marjorie Fields, Edmonds, WA  
Barbara Joan Ford, Edmonds, WA  
Clara N. Hsu, Edmonds, WA  
Nancy Johnson, Edmonds, WA  
Pam Tauer, Edmonds, WA  
Bronwen Bradshaw, Everett, WA  
Julie Martinson, Everett, WA  
Dr, Vicki Roberts-Gassler, Everett, WA  
Paula Townsell, Everett, WA  
Carol Madoerin, Kenmore, WA  
Kristen Fowler, Lynnwood, WA  
Carol McMahan, Lynnwood, WA  
Vanessa LaValle, Olympia, WA Marilyn  
A Boyd, Seattle, WA  
Dr. Mary Paterson, Seattle, WA  
Janet Way, Shoreline, WA  
Lynn Lichtenberg, WA  
Dr. Ursula Bechert  
Keshav Boddula  
Alexandre Gallardo  
Marilyn Ridings  
Dr. Jodi Rodar  
Peyton Student

Michelle Waters