

To: Port of Stockton Board of Commissioners
From: Mary Elizabeth, M.S., R.E.H.S., Delta-Sierra Group Conservation Chair
Date: 10.7.2024
Re: Golden State Natural Resources (GSNR) Wood Pellet Export Project and DTE compliance

The GSNR staff governed by representatives of the Rural County Representatives of California has announced that the lead CEQA agency, the Golden State Financing Authority, will release the Draft Environmental Impact Report on 10.15.2024 with a 60 day comment period.

A California Public Records Act request to GSNR/GSFA/RCRC yielded their outreach plan which I have attached.

We have submitted comments to the Port Commission on a number of occasions describing our concerns with the GSNR wood pellet export project. I ask today that the Port of Stockton invite some of the scientists that are working on this project to give you a briefing in advance of Port staff finalizing comments as a responsible agency.

Recently there has been public discussions about what comes next for GSNR, especially in light of the [agreement with DRAX](#), a multi-national energy company. Current articles regarding DRAX operations that may be of interest to the Port Commissioners and staff are linked below.

We hope that there will be meetings with the community to discuss concerns that are scheduled for November 2024 in advance of any comment submittal.

Please contact me about scheduling a community meeting so that all those working on the project can be invited to participate. I can be reached at melizabeth.sierra@gmail.com.

Regarding another biomass issue, a California Public Records Act request to the SJVAPCD and correspondence regarding numerous notice of violations disclosed during AB617 Steering Committee meetings has not yet yielded any information. We are wondering what kind of monitoring the Port staff does regarding environmental compliance on property owned by the Port.

ARTICLE LINKS

- [Drax fined for starting on Longview, WA biomass fuel plant without proper permits \(The Columbian, September 19, 2024\)](#)
- [Drax receives another fine for air pollution violations in Gloster, MS \(News from the States, September 12, 2024\)](#)
- [DRAX Violations Discovered at Nation's First Carbon Capture and Storage Project - DeSmog 9.13.2024](#)
- September 30, 2024 Land and Climate Review two part article:
<https://www.landclimate.org/gloster/> and <https://www.landclimate.org/drax-west-coast/>

DEIR Outreach Action Plan

PRE-DEIR RELEASE: At least 2 weeks before			
METHOD	TASK	TARGET DEADLINE	LEAD
Website	Post a notice of the impending release on the GSNR and GSFA website. <i>Prep Work: draft and approve language for websites</i>	weeks before DEIR Release	Carolyn
Email	Send an email notification of the impending release date to the GSNR email list, CEQA notification list, RCRC/GSFA Board members, GSNR Board members and other interested parties. <i>Prep Work: Draft and approve email</i>	weeks before DEIR Release	Carolyn

NOTE: Receive the entire DEIR release package from Dudek for review at least two weeks before DEIR release (including Notice of Completion, Notices of Availability, Formal/Legal Notice, Agency Consultation notification, and related mailing lists).

RELEASE: Official Release of DEIR			
METHOD	TASK	TARGET DEADLINE	LEAD
State Clearing House	Upload the Notice of Completion and DEIR to the State Clearinghouse at OPR <i>Prep Work: Provide draft NOC to GSNR for early review</i>	Day 1	Dudek
County Clerks	Mail Notices of Availability to the County Clerks in Lassen, Tuolumne, and San Joaquin Counties for posting. <i>Prep Work: Verify CCs names and addresses for transmittal of Notices of Availability to the County Clerks in Lassen, Tuolumne, and San Joaquin Counties for posting.</i>	Day 1	Dudek
Formal/Legal Notice (Using the form provided in CEQA)	Mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing. <i>Prep Work: Compile mailing lists of the last known name and address of all organizations and individuals who have previously requested such notice in writing.</i>	Day 1	Dudek
	Published at least one time in a newspaper of general circulation in Lassen, Tuolumne, and Stockton. <i>Prep Work: Identify newspapers of record, coordinate ad placement/purchase price and publication schedule with at least one notice in Lassen, Tuolumne, and Stockton.</i>	Day 1	Dudek
	Posted at each project site and other strategic locations in the area where the project is to be located.	Day 1	Dudek

Guidelines)	<i>Prep Work: Prepare broadside notices to be posted at each project site and other strategic locations in the area where the project is to be located.</i>		
	Mailed to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll. <i>Prep Work: Aggregate mailing lists for the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll.</i>	Day 1	Dudek
Agency Consultation	Send notification of the DEIR and request for comment to all of the following: (1) Responsible agencies. (2) Trustee agencies with resources affected by the project. (3) Any other state, federal, and local agencies which have jurisdiction by law with respect to the project or which exercise authority over resources which may be affected by the project, including water agencies. (4) Any city or county which borders on a city or county within which the project is located. (5) Transportation planning agencies and public agencies which have transportation facilities within their jurisdictions which could be affected by the project. <i>Prep Work: Develop mailing list to send notification of the DEIR and request for comment to all of the listed parties (1) through (5)</i>	Day 1	Dudek
Website	Post DEIR on the GSFA forest resiliency and GSNR project pages along with information on how people can provide comments. <i>Prep Work: Draft and prepare website language for posting</i>	Day 1	Carolyn
Email	Send an email notification of the formal DEIR release to the GSNR Board members, GSNR email list, CEQA notification list, RCRC/GSFA Board members, those who have attended past GSNR meetings, our elected stakeholders list, and other interested parties. <i>Prep Work: Prepare draft email</i>	Day 1	Carolyn
Social Media	Provide regular social posts on GSFA and RCRC social media announcing the release of the DEIR, the public meetings, and the deadline to provide comments. If provided to Stockton stakeholders for release, then social media posts would need to be translated. <i>Prep Work: Mock up draft social posts and translate accordingly</i>	Day 1	Carolyn

Media	Proactively notify the media of the release of the DEIR - Press Release: Send release to local and statewide media. - Media Notification: Conduct outreach to key reporters and editors, and make project spokespeople available for interviews. - Talking Points: Provide talking points to Board Members <i>Prep Work: draft press release, prepare list of media reporters to contact, draft talking points and share with Board and staff ahead of time.</i>	Day 1	Carolyn
Flyer	Provide a flyer announcing the availability of the DEIR for public review and comment. This flyer can then be shared with stakeholders to post at key community locations or during canvassing activities. Consider including public meeting information on the flyer if known at that time. Flyer would need to be translated. <i>Prep Work: Draft flyer</i>	Within 1 Week	Carolyn
Print Copies	Provide print outs of the DEIR (or executive summary) at key locations for individuals to access. At least one full print copy of the DEIR will be provided to the public library system in each community. <i>Prep Work: For Lassen and Tuolumne, check with county supervisor for ideas on key notice posting locations and assemble list of libraries. Ideas include: city/county buildings, local post offices. Identify who will conduct the postings.</i> <i>For Stockton, partner with RSSC Partner with RSSC to provide input on potential notice posting locations and assistance in dropping off the copies (including translated versions). Assemble list of libraries.</i>	Within 1 Week	Carolyn
Stakeholder Engagement: Neighbors	Consider going door-to-door again. [Note: neighbors should have already received our formal/legal notice in the mail] <i>Prep Work: Determine if door-to-door is necessary. Prepare any materials needed.</i>	Within 1 Week	Carolyn
	Transmit public notices about the release and opportunities to provide input, including the public meeting. This outreach may require a flyer and social media posts that have also been translated into other languages stating information about the public meeting and locations of physical copies of the DEIR executive summary. <i>Prep Work: Draft toolkit of flyers, social posts, and email drafts for sharing out to key officials/organizations for dissemination. Assemble list of officials/organizations to share toolkit with.</i>	Within 1 Week	Carolyn

Stakeholder Engagement: Key Groups	Contact key stakeholders to notify them of the DEIR release and offer to discuss as needed including elected officials, tribes, partner organizations, and local community groups. [Note: some should already have received our mass email notification (from being on our email list) or our formal/legal notice in the mail] <i>Prep Work: Review stakeholder list and determine an key stakeholders that should either be added and/or should receive a separate phone call/email.</i>	Within 1 Week	Carolyn
Public Meeting(s)	Conduct at least one public meeting to educate the public on the DEIR and provide an opportunity to submit public comments. - Location(s): Stockton, with virtual attendee option - Outreach: Outreach for the public meeting will utilize similar channels and may include press release, flyer, social media, website posting, email, and partnership with a local nonprofit organization in Stockton to conduct local canvassing. NOTE: Outreach for the public meeting(s) will need to occur as soon as a date and location are determined (preferably within 2 weeks of the release of the DEIR) <i>Prep Work: Solidify number of meetings and location(s)</i>	Within 4-8 weeks	Carolyn



Port of Stockton Board of Commissioners and Staff
2201 West Washington Street
Stockton, California 95203
Via email to mrodriguez@stocktonport.com

10.7.2024

Re: Request for information regarding the BayoTech and Home Depot projects

Greetings Port Commissioners,

We made every effort using the available avenues under CEQA to request a full Environmental Impact Report analysis for the BayoTech project. We requested that the Port Commissioners not approve a 10 year lease with BayoTech with two 5 year options for a fossil gas hydrogen production facility at the Port of Stockton, but at the August 2024 meeting, the Port approved the lease and certified the Final IS/MND.

There are a number of questions that have arisen with regard to the BayoTech project which likely you will be discussing during the closed session at today's meeting. Community members have some questions that we hope the Port Board of Commissioners will answer publicly.

- Has BayoTech taken possession of the land under Port of Stockton lease conditions included in August 2024 meeting materials?
- Has the Port of Stockton finalized the Community Benefit Program referenced in the CEQA documents to administer the \$200,000 pledged by BayoTech in an open public meeting?
- Have the pre-construction requirements for stormwater and air quality permits been submitted to the Port of Stockton by BayoTech?

Additionally, when the Home Depot CEQA documents were certified by the Port Board of Commissioners, the developers pledged an extra high-capacity charger in addition to what was required in the CEQA documents and \$200,000 for community benefits. Please provide the final lease requirements for the Home Depot project so that we might better understand the plans for implementing these pledges into enforceable documents.

You may contact me at melizabeth.sierra@gmail.com to discuss these requests regarding the BayoTech and Home Depot projects.

Sincerely,

Mary Elizabeth, Delta-Sierra Group Conservation Chair