

From: [Mary Elizabeth](#)
To: [Rodriguez, Melanie](#)
Cc: [MOTHERLODE-DSG-EXCOM@LISTS.SIERRACLUB.ORG](#); [Margo Praus](#); [Sean Wirth](#); [Dyane Osorio](#); [Bobbi Jo Chavarria](#); [Frost, Rita](#); [Karen Maki](#); [gloria@littlemanila.org](#); [Julie Dunning](#); [Ector Olivares](#); [Davis@restorethedelta.org](#); [Barbara Barrigan-Parrilla](#); ["Gary Hughes"](#)
Subject: Non-agenda Comments for the 11.18.2024 Meeting
Date: Monday, November 18, 2024 7:49:51 AM
Attachments: [11.18.2024 POS GSNR DSG ME.pdf](#)

CAUTION: This email originated from outside the Port. Please exercise caution.

Greetings,

Attached are comments for the 11.18.2024 Port Commission meeting, non-agenda.

Thank you.

Mary Elizabeth, M.S., R.E.H.S.



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

11.18.2024

Re: Golden State Natural Resources Wood Export Project

Greetings Port Commissioners,

The Delta-Sierra Group has been providing regular updates regarding the Golden State Natural Resources (GSRN) wood export proposed project that is being considered by the Golden State Financing Authority (GSFA) lead CEQA agency. Both GSRN and GSFA are projects of the Rural Counties Representatives of California (RCRC) a 40 county advisory governing body which includes four other projects. The RCRC publishes annual position papers one of which involves the opposition to the use of CalEnviroScreen “as the basis for any regulatory, permitting, or land use decisions or studies.”¹ Recognizing complex health effects related to pollution exposures requires long-term public health studies that rarely occur. However, trends become observable when viewing data types from various governmental vetted sources and these CalEnviroScreen data are critical for uplifting the concerns of communities living with high pollutant burdens as many Stockton residents experience.

On 10/22/2024, Golden State Natural Resources (GSRN) released their draft environmental impact report (DEIR) with a 60-day comment period. Upon receiving letters and testimony requesting an extended comment period and more public meetings from our coalition including local, national and international organizations and individuals, along with a letter from the Humboldt Board of Supervisors, the GSFA extended the comment period to 90 days so DEIR comments are now due 1/20/2025.

The DEIR is very long, over 1300 pages with 38 appendices and includes an impact disclosure for three communities, Bieber in Lassen County, Jamestown in Tuolumne County and Stockton in San Joaquin County. Shortly after the release of the DEIR, within 2 weeks, public comment meetings were scheduled. These early DEIR comment meetings were not in accordance with the timing put forth in their communication plan, obtained through California Public Record Act requests.² When attending an earlier “outreach meeting” hosted by Reinvent South Stockton Coalition 7.29.2024, we requested technical meetings to understand the modeling assumptions and were expecting some technical

¹ [2023-24 RCRC Policy Principles Adopted 2023-12-06.pdf](#)

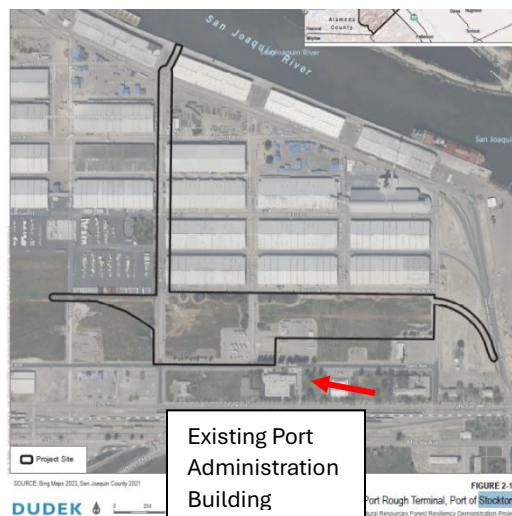
² [10.3.2024 GSRN Outreach Plan](#) and [11.1.2024 email response](#)

workshop be scheduled, especially for a DEIR making findings of overriding significance, but none have been scheduled.

We have been informed that GSNR does not plan on operating the facility and may choose to select DRAX, a multinational energy company with a very negative environmental compliance record.

What public meetings that were scheduled were meetings with a brief overview of the document and opportunities for the public to provide comments on the DEIR. Comments were accepted in Stockton by video conference or in person on 10.30.2024, a mere eight days after the release. The last announced meeting was held in Jamestown, CA on 11.4.2024 and did not include a video component that would have allowed those not able to attend the 10.30.2024 meeting to make comments. A comment that we consistently make involves the recording of meetings and release to the public with website posting, as the Port of Stockton now does, which is good governance. Some improvements have been made regarding GSNR Board meetings which we appreciate but more is needed.

I have included a map from the GSNR DEIR showing the area of the Port that GSNR intends to occupy.



We request that the Port of Stockton host an informational session regarding the contents of the DEIR especially air quality analyses, involving the California Air Resources Board and San Joaquin Valley Air Pollution Control District staff and what cumulative impacts might have been reported if GSNR considered existing facilities, those proposed and those under CEQA review within the Port of Stockton and adjacent to the Port. Additional information meetings regarding transportation impacts may be needed.

No additional meetings have been announced to receive public comments.

We request the Port of Stockton Board of Commissioners direct staff to request in writing that additional public meetings be scheduled by GSFA, the lead CEQA agency in support of environmental justice considerations for proper notice, consultation, and feedback, so that more members of our community can provide their comments regarding the environmental analyses and mitigation measures put forth in the DEIR.

We have shared with Port Commissioners and staff several times issues relating to hazards associated with wood pellets, along with other environmental justice and public health advocates from all over the state. These concerns relating to proposed Port of Stockton operations include failure to comply with environmental regulations (DRAX), fugitive wood dust pollution, fires and explosions at storage and export facilities similar to the Port of Stockton, noise, transportation, and air quality.

We request that the Port of Stockton agendaize the GSNR project so that scientists may brief the Commissioners in advance of finalizing comments by the Port of Stockton as a responsible agency to be submitted to GSFA.

We appreciate the outreach that the Port of Stockton staff is conducting with residents and tenants (outreach committee) and we are interested in learning of the Port of Stockton's analyses and draft comments in advance of finalizing comments on the GSNR wood export DEIR. Thank you for your consideration of our requests. You may contact me at melizabeth.sierra@gmail.com to discuss these requests.

Sincerely,

Mary Elizabeth, Delta-Sierra Group Conservation Chair
Margo Praus, Delta-Sierra Group Chair

From: [Margo Praus](#)
To: [Rodriguez, Melanie](#)
Subject: non-agenda comments for the 11.19.202
Date: Monday, November 18, 2024 1:27:52 PM

CAUTION: This email originated from outside the Port. Please exercise caution.

My name is Margo Praus, a long-time resident of Stockton. I sit on the AB617 Steering committee and I live within the AB617 boundaries and about a mile from the Port of Stockton.

Stockton is already facing some of the highest pollution levels in California. Stockton is designated as a disadvantaged community and was promised additional protection under AB 617. Stockton deserves sustainable economic development that will not place a further burden on Stockton's air quality. Development at the Port of Stockton should not conflict with the Community Emission Reduction Plans established by the CA Air Resources Board.

This project will increase truck and rail traffic between the proposed pellet facilities in rural areas and the port, which could exacerbate air pollution (including dangerous diesel particulates), health and safety, and noise impacts as trucks pass near or through the residential community close to the port.

As you learn more about this project, I urge the Commissioners to oppose this particular project in recognition of the harm it presents to our community—now and in the future.

From: [Esther Mburu](#)
To: [Rodriguez, Melanie](#)
Cc: [Davis Harper](#)
Subject: Port Meeting Comments 11/1/2024
Date: Monday, November 18, 2024 3:10:06 PM
Attachments: [Port of Stockton Comments.pdf](#)

CAUTION: This email originated from outside the Port. Please exercise caution.

Hi Melanie,

Please see attached comments on behalf of Restore the Delta for today's meeting.
Kind regards,

Esther Mburu
[Carbon Policy Analyst](#)
Restore the Delta

Mailing Address:
2616 Pacific Ave #4296
Stockton, CA 95204

pronouns: *She/Her*



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Restore the Delta
2616 Pacific Ave #4296, Stockton, CA 95204
209-479-2559
www.restorethedelta.org



Sent via email

11th November, 2024

RE: Comments on Port Meeting Agenda Items

Dear Port Commissioners,

Restore the Delta would like to comment on the Port Agenda Items C, D& G. The Port's RPS procurement targets for Compliance Periods 4, 5, 6, and subsequent years proposes a scale up in RPS-eligible resource procurement from 44% in 2024 to 60% by 2030. We have the following questions: How does the Port plan to meet these procurement targets, when it has failed two reporting periods in a row to comply, and when the total energy demand of port operations is likely to increase significantly with new electrification investments?

The Port recently received \$110 million from the EPA Clean Ports grant program to facilitate acquisition of electric cargo handling equipment; charging infrastructure, solar generation, and a battery energy storage system; and vessel shore power. Does the Port's failure to comply with the RPS jeopardize these investments? Will the replacement vehicles on the police fleet be EVs?(Item G) Does the port have a plan to reduce reliance on unspecified energy sources which take up more than 60% of the energy mix?

Will the Port be subject to increased fines for failing to meet RPS requirements again? The July 2021 settlement agreement with CARB states: "The Port agrees to comply with all regulatory requirements and acknowledges that repeat violations could result in increased penalties in the future."

The Port should clarify in greater detail the "renewable energy accounting changes" at the CEC that have caused the Port to default on its RPS commitments, as referenced in the Port's Power Source Disclosure, Power Content Label, and Power Content Label Customer Letter (Consent Item C).

The Port cites "renewable energy accounting changes" at the CEC in its Power Source Disclosure (Consent Item C) as causing RPS default, yet simultaneously invokes "Delay of Timely Compliance Rules" in its RPS Procurement Plan (Consent Item D) citing transmission constraints, permitting issues, and transportation electrification. These seemingly contradictory explanations require clarification.

As a major economic driver in the Delta region, the Port's environmental commitments significantly impact community health. We urge development of a transparent, detailed plan for achieving renewable energy obligations, including clear strategies for reducing unspecified energy reliance and concrete steps to overcome compliance barriers.

Sincerely,

Davis Harper
Carbon and Energy Program Manager
davis@restorethedelta.org

Esther Mburu
Carbon Policy Analyst
esther@restorethedelta.org

Concerns Regarding Levee Breach on Victoria Island

A handwritten signature in dark ink, appearing to read 'Barbara Barrigan-Parrilla', written in a cursive style.

Barbara Barrigan-Parrilla
Executive Director
barbara@restorethedelta.org