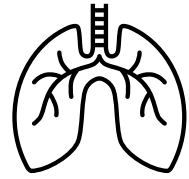


Residents for a Healthy Port of Stockton



Via mrodriguez@stocktonport.com

5.4.2025

Dear Port of Stockton Commissioners and Port Staff,

The undersigned residents of Stockton and nearby communities oppose Golden State Natural Resources' project (GSNR) because:

- We are a disadvantaged community under AB 617 in a nonattainment air quality zone. The Port of Stockton and its tenants are major pollution concerns for our community.
- This GSNR wood pellet export project will increase air pollution during a time when we are doing everything we can to reduce air emissions, and
- This GSNR wood export project will increase our risks to fires and explosions with only already strained City of Stockton fire resources available to respond.

This wood export project involves the production of one million metric tons of wood pellets in Lassen and Tuolumne Counties to be transported by various ways to the Port of Stockton. GSNR has already signed an MOU with DRAX which includes the potential to transfer operational control to DRAX. DRAX is a multinational energy supplier with a very bad environmental record who was recently denied an expansion permit in Gloster Mississippi and has been issued construction violations at the Port of Longview in Washington as their entry on the west coast of the United States of America.

1. We ask the Port of Stockton not to enter into agreement with GSNR.

The Port of Stockton and lessees, with other nearby freight operations, generate substantial truck trips and railroad trips to and from Stockton. Central Stockton is bisected by a network of truck routes and is bounded by three interstate highways as well as railyards and rail lines going through South Stockton and East Stockton. This intense mix of polluting land uses has created a disproportionate air pollution burden for our local community.

According to the Draft Environmental Impact Report, the Golden State Natural Resources proposed wood pellet export project is expected to result in significant and unavoidable air quality impacts. The residents of Stockton already experience significant air pollutant exposures due to existing projects that continue to be allowed with unmitigated air pollution emissions.

One more project, with the scope of risks that this GSNR wood export project poses, is too much and conflicts with the goal to improve the health of our community.

Stockton residents and those impacted by unmitigated pollutants in neighboring counties are primarily disadvantaged and deserve better, as all Stocktonians do.

2. We ask the Port of Stockton to partner with residents to develop a sustainable strategic plan that will not further harm resident's health while allowing for economic growth.

The strategic plan should include provisions that all projects approved by the Port of Stockton implement mitigation measures to reduce and fully mitigate air pollutant emissions. These mitigation measures should be included in any lease the Port of Stockton may consider. The following are mitigation measures that are needed to reduce impacts that decrease air quality, increase greenhouse gas emissions, and increase health risks which should be required as a minimum:

1. All tugboats in use have Tier 4 engines, the cleanest diesel engines available are needed to address the proposed project's impact on air quality and public health (voluntary by the Port of Oakland).
2. Zero-emission switchers and line-haul locomotives including on-site infrastructure to support those zero-emission locomotives within the project area are needed to address the proposed project's impact on air quality and public health.
3. Zero emission trucks and infrastructure to support zero-emission trucks are needed to address the proposed project's impact on air quality and public health.
4. Zero emission cargo handling equipment and infrastructure to support zero emission cargo handling equipment are needed in addition to any non-sparking electric automatic conveyor system that may be proposed.

We request additional public meetings, in Stockton and online, to learn about how the Golden State Financing Authority and consultants respond to DEIR comments related to air quality impacts, habitat destruction, and potential for fire and explosion at the pellet production facilities and at the pellet storage facility planned for the Port of Stockton.

We ask for these meetings in advance of any public hearing when CEQA certification is to be considered. We request additional meetings with the Port of Stockton to discuss mitigations that may be considered in leases that may be made with GSNR, the "official" project proponent in advance of any possible CEQA certification by GSFA. The Port of Stockton, the California Air Resources Control Board, and the Humboldt Board of Supervisors along with many environmental organizations, local and national, have all requested GSNR/GSFA hold additional Stockton public meetings.

The proposed project's environmental risks negate years of work and trust by undermining one of the State's fifteen AB 617 study areas and jeopardizing the State Implementation Plan's approval by the US Environmental Protection Agency. Stockton does not need these wood pellets stored at the Port -- indeed, they are all for export markets. The project DEIR states that 8 jobs in Stockton will be created at the proposed storage wood pellet facility. Protect our public health and public safety: **JUST Say NO to GSNR!**

Please contact melizabeth.sierra@gmail.com to arrange for a meeting time to discuss our concerns and suggestions.

Sincerely,

Stockton California Residents

Alan Cook	Gilbert Mendez	Margo Praus
Alberto Valencia	Gloria Alonso	Maria Vielma
Alima Zarif	Jackie Ibus	Marika Wolfe
Angela Golde	Jeff Gamboni	Mary Bullard
Anne Baird	Jim Marsh	Mary Elizabeth M.S., R.E.H.S.
Antonia Hernandez	Joann Meays	Mike Wurtz
Ashad Castellano	Johnny Palacios	Monse Alvarez
Brett DeBoer	Judy Craig	Nadia Monroy
Brianna Buntun	Judy Yucht	Niki Smith
Charlene Daly	Julie Devincenzi	O.H.
Danela Rios	Julie Dunning	Pandora Crowder
Daniel Richardson	Kathleen Moody	Paul Von Elsner
Daniela Ramirez	Kathy Her	Paula Pantoja
Destiny Rivas	Kathy Ikeda	Rachel Peluso
Diane Lopez	Katya Evanhoe	Shannon Lyons
Donna Marciano	Kazimir Ustach	Stephanie Bravo
Ellie Perez	Kenna Strosnider	Steve Ikeda
Eric Johnson	Kimberley Tablit	Susan von Sosten
Eric Parfrey	Kristine Williams	Tanisha Raj
Erica Heyne	Lorie Espejo	Venicia Johnson
Frank Camargo	Louis Maldonado	

Lodi California Residents

Alicia Valenzuela
Carolyn Dougherty
Kathryn Hieb
Patricia Richards
Ector Olivares

Lathrop California Resident Yolanda Mitchell

Manteca California Resident Mary Jo Woodmansee

Woodbridge California Resident Constance Starnier

Galt California Resident Elizabeth Wost

Riverbank California Resident Ralph Baker

Applegate California Resident Russell Rubio

Valley Springs California Resident Bruce Giudici

Port of Stockton Commission
315 Fyffe Avenue in Stockton
Via mrodriguez@stocktonport.com

5.5.2025

Re: GSNR April 2025 Port of Stockton Statement

We appreciate that the Port of Stockton provided the public with [statement in April 2025](#) about the GSNR wood export project. However, waiting for the project to complete a review of comments before having a meeting to allow for the public and residents to provide information to the Commission is unnecessary.

We and many other organizations including the Natural Resources Defense Council have regularly requested that the Commission hear and learn more about the project from scientists who have studied the project and produced extensive technical comments of approximately 175 pages. The Richmond City Council which is related to the Port of Richmond, said **no to GSNR** at the Notice of Preparation stage.

The Port of Stockton's April 2025 statement included information about possible locations that staff has provided to GSNR: "To date, we have only provided general location options and publicly available tariff information to assist GSNR in conducting their global analysis." Please disclose these location options to residents of Stockton.

We disagree with the statement below that GSFA is an "unrelated" CEQA public agency as both the parent organization RCRC, the CEQA public agency GSFA, and the project proponent GSNR are led by the same individual. The Stockton Environmental Justice Education and Advocacy DEIR comment letter was addressed to all three.¹

"The Port of Stockton has not engaged in negotiations with GSNR, nor have any commercial terms been discussed. In fact, GSNR has clearly stated it does not plan to address commercial terms or submit a formal proposal until an unrelated public agency completes the California Environmental Quality Act (CEQA) process. This process includes reviewing and addressing public comments submitted thus far, making any necessary modifications, and finalizing an environmental assessment. After this critical process is complete then GSNR may submit a formal proposal to the Port."

We disagree with waiting for GSNR to complete the CEQA process before presenting information to the Port Commission. We request that rather than having 2-3 minutes to respond to a GSNR presentation that a residents/scientist workshop be held that allows for longer public presentations that GSNR will be able to have 2-3 minutes to respond. The harms of the project to the residents of Stockton, California, and globally must be fully understood and described.

"To that end, once GSNR's CEQA process is completed and GSN(R) is prepared to submit a formal proposal, the Port of Stockton will provide a forum for GSNR to make an informational presentation about their project to the Port Commission. This forum will offer both Commissioners and the public an opportunity to hear more about the project, and provides the public an additional opportunity to present input before any decisions are made."

Sincerely,

Mary Elizabeth M.S., R.E.H.S.
Delta-Sierra Group Conservation Chair, Sierra Club
Melizabeth.sierra@gmail.com

Ector Olivares
Environmental Justice Program Manager
Catholic Charities of the Diocese of Stockton

¹ [GSFA DEIR Comments 1.20.2025 ME.pdf](#)