Public Cor

From: Sent: To: Cc: Subject: Martha Walden <mawalden53@yahoo.com> Sunday, January 12, 2025 4:21 PM Bushnell, Michelle; Bohn, Rex; Mike Wilson; Arroyo, Natalie; Madrone, Steve COB; dwchandl@gmail.com proposed letter to "GSNR

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Thank you for considering the proposed comment letter on the Golden State Natural Resources (GSNR) Forest Resiliency Demonstration Project. As the letter points out, the goal of reducing the damage of wildfires rings loudly for Californians. I agree that those goals would be much better served by a modified project. As it stands its goals are threatened by a mismatch between forest resiliency and the means GSNR has chosen to finance the work. The project should focus more on beneficial thinning of overcrowded forests and less on feeding wood pellet plants. The danger is that the carbon debt would worsen climate impacts, leading to more wildfires.

I definitely share the reservations about the sustainability of the feedstock for such a large operation over its indefinite lifespan. GSNR's treatment of the forest is supposed to last for 20 years but what about the future of the wood pellet plants after that?

Other excellent points are made in the letter about air quality impacts and underestimated greenhouse gas emissions. My suggestion concerns the Limited Alternatives Analysis. While eliminating the emissions of shipping wood pellets would be good, those emissions are dwarfed by those of burning the product. I realize of course that GSNR has no obligation to count those emissions in light of official carbon accounting rules that assume carbon resequestration within a certain period of time. The glaring question for us all is if we have that period of time before the climate irretrievably hits the skids. If that sounds overly dramatic, you're not listening to the Intergovernmental Panel on Climate Change or the five hundred climate scientists who signed an open letter of alarm to heads of states that don't count emissions from biomass electricity.

In light of that need to do everything we can do to reduce emissions instead of increase them within the next forty years, please suggest some biomass utilization technologies that don't involve incineration. Burning wood to make electricity can only displace other types of generation that emit less GHG.

Alternatives include wood products that sequester carbon instead of speeding it to the atmosphere. There are many options including insulation made from wood fiber and others made from cellulose. Also, producing hydrogen to serve as aviation fuel makes sense because aviation is hard to decarbonize. I'm not sure, but I don't think the hydrogen option would require the extra emissions of converting wood waste into pellets.

Thank you for considering these points.

Martha Walden

Public Comment - -

From:Daniel Chandler <dwchandl@gmail.com>Sent:Sunday, January 12, 2025 12:06 PMTo:Bushnell, Michelle; Madrone, Steve; Arroyo, Natalie; Wilson, Mike; Bohn, RexCc:COBSubject:Kudos for your letter regarding the GSNR pellet plant proposal

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Chair Bushnell and Supervisors Madrone, Wilson, Arroyo and Bohn.

Thank you very much for pointing out some of the weaknesses of the GSFA DEIR. It is already a strong letter, but here are a few points that might emphasize your concerns:

1.

The first point of your letter says "The DEIR emphasizes thinning and prescribed burns as key methods for wildfire mitigation." Unfortunately there is nothing about prescribed fire in the document. Prescribed fire and prescribed fire plus thining are much more effective than thinning alone, which is all the DEIR offers. [Try searching the DEIR for "prescribed".]

2. As the letter points out, half of the feedstock will come from commercial logging and salvage, but for most topics the DEIR only analyzes the effects of the GNRA thinning only project. How can the lead agency evaluate the whole and cumulative impacts of the proposal, especially on forest health and wildfire severity, if the effects harvesting and burning half of the feedstock are unanalyzed in the DEIR?

3. The letter points out correctly that the greenhouse gas analysis underestimates the impact of forest thinning. You could consider adding: The GHG impact during the project's life should be analyzed, not after an arbitrary 60 years.

4. On the same point, Greenhouse gas impacts are also understimated because no account is given of the methane to be released by huge piles of wood chips waiting to be processed, especially in winter months when forest activity is curtailed.

5. Your letter points out an incomplete analysis of alternatives. Alternative not analyzed include a) other wood products like fencing or wood wool, and b) biofuels, especially hydrogen.

Thank you very much for writing a strong letter addressing DEIR weaknesses.

Dan Chandler

Daniel Chandler <u>dwchandl@gmail.com</u> Phone: 707 677 3359 Mobile: 707 601 6127

From: Sent: To: Subject: Sue Parsons <sparsons4@gmail.com> Monday, January 13, 2025 9:20 PM COB Please send letter opposing wood pellet project

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Board of Supervisors:

Please know that I support you in opposing the wood pellet project and urge you to send the letter that explains its flaws.

Would you please include these two revisions to the letter?

1) Remove the suggestion to use forest thinnings for biomass energy in CA instead of overseas. (See our <u>Better Than</u> <u>Burning</u>webpage for examples of cleaner commercialized uses.)

2) Add a recommendation that the EIR clearly state the distances to the nearest sensitive people in project communities and list every county where health costs exceed one million dollars a year.

Thank you very much,

Susan Parsons, Bayside

"A book, too, can be a star, explosive material capable of stirring up fresh life endlessly, a living fire to brighten the darkness, leading out into the expanding universe." - Madeleine L'Engle

From: Sent: To: Subject: Jerry Tobe <tagchai@gmail.com> Monday, January 13, 2025 10:04 PM COB Comments on the Draft Environmental Impact Report for the GSNR Forest Resiliency Demonstration Project

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Board of Supervisors,

Thank you for the letter addressed to Mr. Patrick Blacklock regarding the Draft Environmental Impact Report for the GSNR Forest Resiliency

Demonstration Project.

Please consider revising the example in

1. Limited Alternatives Analysis

The DEIR does not adequately evaluate alternatives that could reduce environmental and community impacts. Please consider using one or more of the following examples to have less adverse impact on public health and the environment than the example given

- Burning biomass, such as herbaceous or woody crop residues, non-salvageable timber and slash, in low-oxygen conditions creates biochar. Biochar may also be used as a soil amendment for two purposes – to improve plant health and to store carbon. It is predicted that at least 50% of the carbon in any piece of waste turned into biochar becomes stable, locking away that carbon for a period of several to hundreds of years, offsetting its contribution as a greenhouse gas in the form of carbon dioxide.

- Trex Company, Inc. makes wood-alternative composite decking, railing, and other outdoor items from 50% wood waste and 45% recycled plastic.

- Daikawood is a new all-natural material composed of wood waste, giving industry a sustainable digital adaptation to current wood fabrication processes.

- Compost, which when applied to crop and range land, increases productivity and water retention. Socks made of composted wood chips absorb dioxin and PFAS from soil runoff.

- Hydromulching with wood waste and native plant seed stabilizes slopes after wildfires, preventing soil erosion and contamination of surface water.

You highlight the impact on Stockton in pointing out the NOx and PM 2.5 emissions exceeding regional level. Please consider recommending the EIR clearly state the distances to the nearest sensitive people in project communities and list every county where health costs exceed one million dollars a year.

Thank you for reading my email

Best Regards, Jerry Tobe

From: Sent: To: Subject: Walter Paniak <wpaniak@gmail.com> Monday, January 13, 2025 10:45 PM COB Agenda item 25-124

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

I do not support wood pellet manufacturing on an industrial scale. I urge you to consider the no project alternative. Quoting Carl Sagan "extraordinary claims require extraordinary proof." Biomass power is conceptually renewable but on a time scale that we cannot afford. In 2017 a group of 68 climate scientists sponsored by Woods Hole Institute wrote the EPA arguing against biomass as renewable energy. In 2018 800 scientists did the same for the European Union parliament. None of these scientists had a dog in the hunt.

People who are for biomass power have political and economic reasons. However, we have generational responsibilities. Both the EPA and CARB state that California Forrests are already a carbon **source**; this project will only add massively to that total both locally and remotely.

Quoting author Upton Sinclair " It is difficult to get a man to understand something when his salary depends upon his not understanding it".

Short term profit should not rule. My view is that there will be private profit and public liabilities in dollars, bad health outcomes, and public subsidies. I suspect there will be more efficient and less costly power alternatives in the future. Investment dollars should not go up in smoke.

Thank you for your thoughtful consideration.

Walt Paniak Arcata resident

From: Sent: To: Subject: Naomi Silvertree <naomisilvertree@gmail.com> Monday, January 13, 2025 10:51 PM COB bio fuels

Follow Up Flag: Flag Status: Follow up Flagged

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Please people. Our remaining forests have been severely impacted by decades of logging. They need to be left alone. You must understand the whole issue of global warming in not fake or a joke. The forests need to stand. Wind power severely impacts our bird populations. Please go solar! If wood pellets are to be part of our energy picture they should be waste wood only and manufacturing and burning of wood pellets must have adequate safeguards against release of particulate matter into the atmosphere. Thank you.

Naomi Silvertree

From: Sent: To: Cc: Subject: diane ryerson <adryerson7@gmail.com> Monday, January 13, 2025 11:22 PM COB diane ryerson Agenda item 25-124

Follow Up Flag: Flag Status: Follow up Flagged

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January 13, 2025

Agenda Item: 25-124

Dear Supervisor Michelle Bushnell, Chair and Humboldt County Supervisors,

As a Humboldt County resident, I thank you and your staff for writing well analyzed comments on the DEIR for the proposed wood pellet project. I strongly agree that the DEIR overstates the forest resiliency benefits and understates the GHG impacts. We know the conditions that greatly increase wildfire risk: higher air temperature, strong winds (50+ mph), low fuel moisture content and low humidity exacerbated by drought. The Los Angeles area is a good example – strong Santa Ana winds, higher than average January temperatures, less than a quarter inch of rain since July, 2024. These conditions are more likely to occur now and with greater frequency because global GHG emissions have increased 60% since 1990. With strong winds and ember rain, forest thinning and brush removal can't stop the rapid fire spreading. This wood pellet project needlessly adds significant amounts of GHGs to the atmosphere, decreases carbon sequestration within the time frame that we have to reduce emissions and increase sequestration (in 2024, hottest year on record, average global temperature was 1.5 degrees Celsius above the 1850 temperature) and pushes us faster toward temperatures we can't survive. I urge you to support the No Project Alternative.

The US Forest Service dropped the plan to save older, mature trees, and the states will now have to provide protection for the old growth trees that survive fires best and sequester more carbon. The wood pellet project DEIR refers to "round wood" and includes in this category trees up to 40 cm dbh. In Humboldt County, I thought we called these "logs". The USFS memorandum opens all of the national forests in California to potential wood pellet production. Consider the incoming federal administration led by a felon convicted for 34 counts of fraud who is expressing his desire to withhold disaster aid and satisfy his revenge desire against California. I urge you to support the No Project Alternative.

Better solutions exist. Test drilling for deep geothermal energy is scheduled for 2026. This technology can scale up rapidly, provide base load energy, utilize the 85,000 coal plants in existence globally, and provide electricity for 1 cent per kilowatt hour. Check this out: <u>https://www.quaise.energy/</u>

Thank you for seriously considering my comments.

Diane Ryerson, Arcata resident

From: Sent: To: Subject: Sue Y. Lee <syl1@humboldt.edu> Tuesday, January 14, 2025 2:01 AM COB support for letter to RCRC and request for modification

Follow Up Flag: Flag Status: Follow up Flagged

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Board of Supervisors,

I am writing to state my strong support for your proposed letter to Patrick Blacklock on the Draft Environmental Impact Report for the GSNR Forest Resiliency Demonstration Project. Thank you for criticizing the proposed million ton wood pellet project's flawed environmental impact report.

Thank you for this letter.

However, I wish to request the following 2 revisions:

1) Remove the suggestion to use forest thinnings for biomass energy in CA instead of overseas. (See our <u>Better Than Burning</u> webpage for examples of cleaner commercialized uses.)

2) Add a recommendation that the EIR clearly state the distances to the nearest sensitive people in project communities and list every county where health costs exceed one million dollars a year.

Thank you for your consideration for the health of marginalized communities,

Sue Y. Lee Mossman, chair of Climate Action Campaign at the Humboldt UU Fellowship and CAC Member of Humboldt Clean Energy Coalition

Public Comment J.2

From: Sent: To: Subject: Julie Doerner <julsart@gmail.com> Tuesday, January 14, 2025 7:18 AM COB GSNR Draft Environmental Impact Report

Follow Up Flag: Flag Status: Follow up Flagged

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Humboldt County Board of Supervisors,

I support the letter regarding the draft environmental impact report stating reasons for further study of the GSNR wood pellet production project. It outlines many problems with the project. An additional concern is the air quality issues that would occur far beyond south Stockton. Please consider revising the letter to include communities beyond the immediate area of South Stockton that would also be impacted by an increase in air pollution.

Sincerely,

Julie Doerner, McKinleyville

From:Kate McClain <katemcclain1@gmail.com>Sent:Tuesday, January 14, 2025 7:26 AMTo:Madrone, SteveCc:COBSubject:No on Wood Pellet manufacturing

Follow Up Flag: Flag Status: Follow up Flagged

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Steve,

Thank you for criticizing this terrible project to manufacture wood pellets from forest thinning and shipping them overseas. Such a great waste of energy and huge pollution issue! You have my support in opposing any or all of this proposal.

One of my biggest concerns is that these projects not only take "waste" thinning, they are known to cut healthy trees. I am also concerned that the forest floor needs to be able to decompose "waste", to regenerate the soil for its own future health. This form of extraction is dangerous for the future of the forests.

As you know, there are many more creative and environmentally helpful uses for wood chips. These industries could be much more beneficial to communities than buying overseas.

Hope you get a chance to see the Better Than Burning webpage for examples of cleaner commercialized uses.

Thank you for your thoughtful leadership in taking care of our environment, people, the whole community.

Kate McClain

McKinleyville

1) Remove the suggestion to use forest thinnings for biomass energy in CA instead of overseas. (See our <u>Better</u> <u>Than Burning</u> webpage for examples of cleaner commercialized uses.)

2) Add a recommendation that the EIR clearly state the distances to the nearest sensitive people in project communities and list every county where health costs exceed one million dollars a year.

Tomorrow the Board of Supervisors will vote on a letter criticizing the proposed million ton wood pellet project's flawed environmental impact report. Supes need to know we're behind them in opposing this terrible project. This will come early on the agenda tomorrow am. If you can, please attend and indicate strong support either

From:	Vaughan Frost, Rita <rfrost@nrdc.org></rfrost@nrdc.org>
Sent:	Tuesday, January 14, 2025 8:20 AM
То:	COB
Subject:	Public Comment re: agenda item J2 from Rita Vaughan Frost 1/14/2025
Follow Up Flag:	Follow up
Flag Status:	Flagged

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Subject: Public comment concerning agenda item J.2. regarding the Golden State Natural Resources Wood Pellet Project at 1/14/2025 Humboldt Board of Supervisors meeting

To: Humboldt Board of Supervisors

From: Rita Vaughan Frost, Forest Advocate, Natural Resources Defense Council (NRDC)

To the Humboldt Board of Supervisors and whom it may concern, I'm submitting this public comment on behalf of Natural Resources Defense Council regarding agenda item J2.

We strongly support the Board of Supervisors' signing and sending the letter commenting on the draft environmental impact report for the Golden State Natural Resources (GSNR) "Forest Resiliency" Demonstration project.

Industrial scale wood pellet production has never had a foothold in California. We strongly urge you to heed the experiences of communities in the Southeast U.S. and British Columbia, who have lived with the industry for a decade or more in some cases. Communities have experienced years of their precious forests being cut down, dried, shredded, and toxically manufactured into wood pellets—all for overseas energy markets. These same communities complain about the constant hammering noise from the facilities, the trucks congesting their roads, and the wood dust that falls on their homes. Their cries have been uplifted by organizations ranging from the NAACP to the American Lung Association who stand firmly against industrial-scale wood pellet manufacturing. As California considers the first proposal for industrial-scale wood pellet manufacturing from Golden State Natural Resources, we must heed their warning as a clarion call.

Addressing the risk wildfires pose to California communities is a compelling need, but GSNR's DEIR fails to demonstrate their Project would actually accomplish that end. The DEIR simultaneously admits that cutting forests and producing wood pellets for international export and combustion will worsen the biodiversity and climate crises, all while admitting there will be significant air pollution and other impacts on communities across California that already experience unacceptable levels of pollution. Tellingly, the DEIR's alternatives analysis is inadequate, inaccurate, and misleading. The DEIR reveals a project driven by profit, not responsible forest management.

GSNR's project is just another biomass boom and bust for overseas markets—the last thing California needs.

Thank you for Humboldt County's consideration of submitting a letter on this project. We strongly support your action.

Respectfully,

Rita Vaughan Frost

Rita Vaughan Frost Forest Advocate Nature Program

NATURAL RESOURCES DEFENSE COUNCIL

111 SUTTER ST., 20TH FLOOR SAN FRANCISCO, CA 94104 M (512)423-0620 rfrost@NRDC.ORG

NRDC.ORG

From: Sent: To: Subject: Wendy Ring <wring123@gmail.com> Tuesday, January 14, 2025 8:30 AM COB Comment for today's Supervisors Meeting Item J2

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Comment on Agenda Item J2.

Thank you for considering a letter criticizing GSNR's flawed DEIR. I strongly encourage you to send this letter but suggest some modifications.

I have extensively reviewed the DEIR's air quality analysis. You are right. It is bad. But even in its flawed state, it shows significant health impacts in many environmental justice communities, not just Stockton. State law and the California Environmental Justice Alliance include low income communities as well as communities of color in their definitions of EJ communities. Lassen and Tuolumne County, low rural areas where NOx and particulate levels will double or triple, certainly qualify. So do communities in distant but more densely populated urban areas where those particulates and ozone subsequently travel, since the number of people affected is heavily weighted by the size of the exposed population.

An analysis using the DEIR's estimates of criteria pollutant emissions and the same EPA modeling tool used in the DEIR analysis revealed multimillion dollar health impacts as far away as Los Angeles, with the highest death rates taking place across the state line in Reno, NV. An EJ analysis must be broad enough to include rural areas where most people are poor but economically heterogeneous census tracts don't score high in CalEnviroScreen and cumulative impacts in urban EJ communities already suffering from high burdens of pollution.

It could either be a writing error or an extremely serious actual omission that the list of air toxics in Appendix B4 Health Risk Assessments, which describes the modeling used to determine air toxic health impacts, only includes toxic emissions from transportation and not air toxics emitted by the pellet plants themselves.

Finally, emissions from fire in pellet storage silos must be included. These fires are Very common, hard to extinguish, and can burn On for weeks or months. An analysis in 2018 found that over half of the 15 largest and newest plants producing pellets for export had serious fires in the preceding four years. Given these odds it is highly probable that there will be fires in pellet storage areas over the 20 year project life and their emissions should be included in the analysis.

Given that climate driven disasters are here now, near term warming is a matter of life and death, and the longterm future of forests is uncertain, your recommendations on GHG analysis should include setting a temporal boundary.

Finally the letter's suggested alternatives include more local biomass energy generation plants. Biomass energy emits more carbon and pollution than coal and displaces the production of cheaper cleaner energy sources. Expanding biomass energy is not an acceptable alternative when there are other climate beneficial commercially viable uses for

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wood fiber: composite wood construction products (like Trex and Anderson windows), wood wool insulation (produced for decades in the EU and now also in Maine), high grade cellulose, and biochemical replacements for petrochemicals (see Origin's new plant in Ontario) that could be implemented if the project was scaled down from what would feed a massive industrial export scheme to what might actually help limit wildfire damage.

Please consider including the following recommendations in the letter:

The time span for greenhouse gas analysis should be the project lifetime.

The EIR should clearly state distances from emissions sources to nearest sensitive receptors.

The EIR should disclose air quality impacts in every county (in CA and beyond) where modeled health costs exceed one million dollars.

The EIR should list all of the air toxics and their sources used in modeling air toxics health impacts.

The EIR should include fire emissions from project sites where pellets are stored based on the fire occurrence rates at existing plants of comparable size producing pellets for export.

The EIR should include and model pollution and greenhouse gas emissions, including biogenic carbon, for smaller scale projects limiting feedstock to necessary fuel reduction producing commercially proven alternative products including wood wool, biochemicals (a process which also produces biochar), and modern composite construction materials.

And PLEASE remove mention of new biomass power plants as a solution.

Sincerely,

Wendy Ring MD, MPH

Public comment J.2

From: Sent: To: Subject: Gail Coonen <gailmail580@gmail.com> Tuesday, January 14, 2025 10:09 AM COB Pellet Plant letter

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Board,

I am a resident of Arcata who is concerned about the proposed GSNR pellet plant in neighboring counties. Thank you for the critiques you have given to their ERI.

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These kinds of critiques are critical at this time of the climate crisis and continued health impacts of pellet plants, shipping ports and forest over cutting.

Thank you, Gail Coonen

From: Sent: To: Subject: Lynda McDevitt <lyndamcneedle@gmail.com> Tuesday, January 14, 2025 9:24 AM COB Pellet Plant letter

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To Supv.Michelle Bushnell, Rex Bohn, Steve Madrone, Mike Wilson and

I strongly encourage the Board to send their letter of disapproval of the proposed pellet factories in Tuolumne and Lassen Counties. However there are 2 very important revisions:

1. The proposed suggestion that more though smaller biomass plants in California is an avoidance of the fact of the pollution and CO2 production created by these facilities. There are other ways to deal with bio-waste without increasing the rate of climate change and pollution.

2. Add a recommendation that the EIR report the nearest sensitive communities that will be affected by the pollution created by this pellet factory.

Thank you for your consideration, Lynda McDevitt, Trinidad resident

Public Comment J.2

From: Sent: To: Subject: Lynda McDevitt <lyndamcneedle@gmail.com> Tuesday, January 14, 2025 10:38 AM COB 25-124 Letter to GSNR

Follow Up Flag: Flag Status: Flag for follow up Completed

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Dear Board of Supervisors,

I strongly recommend that you send your letter of non-support for the development of pellet factories in Tuolumne and Lassen Counties. The Forest Resilancy Project is a mis-nomer as it will decrease forests and produce pollution and CO2 emissions.

However there are two revisions that are important.

1. Remove the recommendation to use biomass in California rather than exporting to Europe. Biomass as energy source can be from a clean systems rather than from burning. This is not an acceptable energy source during this period where we need to reduce CO2 emissions.

2. Recommend that EIR plainly state the distances to the nearest sensitive communities and list counties where health costs exceed one million dollars per year.

Thank you for your attention to this important matter.

Lynda McDevitt

PS. I had sent a previous email but had not titled it correctly.

Public comment J.Z.

From: Sent: To: Subject: Lee Dedini <dedinilee@gmail.com> Tuesday, January 14, 2025 12:33 PM COB Subject: Comments on the Draft Environmental Impact Report for the GSNR Forest Resiliency Demonstration Project

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

To all Humboldt County Supervisors,

I support your sending of the letter opposing the proposed million ton wood pellet project, flawed EIR.

I urge all supervisors to remove the use of forest thinnings for biomass energy, instead of sending overseas. There are much better environmental means of dealing with thinnings, by seeing "Better than Burning" website. Also please add a recommendation that the EIR states distance to nearest people in project areas and list counties

where health costs exceed \$1 Mil. a year.

Thank you, Lee Dedini, Bayside, Ca.

From: Sent: To: Subject: Pat Kanzler <rivndell7@gmail.com> Tuesday, January 14, 2025 2:27 PM COB pellet project

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

With the fires in LA, you would think to cancel the project entirely.....we are causing our own problems: Nestle taking water from us and selling it back for profit; slashing firefighter's budgets; more carbon and methane from burning; allowing convicts more compensation while fighting fires!!!!!!! Fossil fuel extraction allowed.....

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Please, "NO" Pat Kanzler Eureka