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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

KELSEY CASCADIA ROSE JULIANA;
XIUHTEZCATL TONATIUH M., through
his Guardian Tamara Roske-Martinez; et al.

Plaintiffs,

v.

The UNITED STATES OF AMERICA;
DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Federal Defendants.

Case No.: 6:15-cv-01517-TC

DECLARATION OF JULIA A. OLSON in
Support of Plaintiffs' Response to Intervenor
Defendant AMERICAN FUEL &
PETROCHEMICAL MANUFACTURERS'
MOTION's Motion to Withdraw

I, Julia, A. Olson, hereby declare and if called upon would testify as follows:

1. I am an attorney of record in the above-entitled action and I have personal knowledge of the statements made herein.
2. On February 15, 2017, Plaintiffs served counsel for Intervenor Defendants with a draft Rule 11 motion, which included relevant evidence of knowledge of each trade association, and their members, on the factual allegations of climate change, in an effort to compel Intervenor Defendants to specifically admit or deny the allegations. Said draft Rule 11 motion is attached as an exhibit to Declaration of Julia Olson Supporting Plaintiffs' Response to NAM's Motion to Withdraw, ECF 170-1, and is a true and correct PDF copy of that draft Rule 11 motion.
3. Attached as Exhibit 1 to this declaration is a list of AFPM members, pulled from: American Fuel & Petrochemical Manufacturers, Membership Directory, <https://www.afpm.org/membership-directory> (last visited June 2, 2017).
4. Incorporated by reference to this declaration and attached as Exhibit 2 to the Declaration of Julia Olson Supporting Plaintiff's Response to API's Motion to Withdraw is a true and correct PDF copy of the following article: Chelsea Harvey, *These Fossil-Fuel Groups Joined a Historic Climate Lawsuit. Now, They Want to Get Out of It.*, Wash. Post (May 26, 2017), <https://www.washingtonpost.com/news/energy-environment/wp/2017/05/26/three-fossil-fuel-groups-joined-a-historic-climate-lawsuit-now-they-want-to-get-out-of-it>. In this article, Donna Cronan, spokesperson of AFPM, is quoted as writing: "AFPM has decided to withdraw from this case, as we are confident that the U.S. Department of Justice will rigorously defend its position and that the court

president.”

5. Incorporated by reference to this declaration and attached as Exhibit 3 to the Declaration of Julia Olson Supporting Plaintiff’s Response to API’s Motion to Withdraw is a true and correct PDF copy of Shell Oil Company, a member of AFPM, internal document: A Better Life with a Healthy Planet: Pathways to Net-Zero Emissions, goo.gl/FCsZtQ, in which Shell says: “The rising level of CO₂ not only puts pressure on the climate, but also warms and acidifies the oceans, raises sea levels, threatens land-based ecosystems and affects patterns of food production. There is broad scientific consensus that the quality of life for hundreds of millions of people stands to suffer from this second challenge.” Page 9. “Even if annual global CO₂ emissions remain steady at their current level, the cumulative emissions consistent with a rise of 1.5°C could be reached as early as 2028.” Page 19.
6. Incorporated by reference to this declaration and attached as Exhibit 5 to the Declaration of Julia Olson Supporting Plaintiff’s Response to API’s Motion to Withdraw is a true and correct PDF copy of the following: D. J. Devlin, Exxon Biomedical Sciences, *Purported Impact of Climate Change o[n] Human Health* (Sept. 19, 1986). This document details potential negative impacts on human health and wellness that climate change could cause, discussing malaria outbreaks, rodent-borne hantavirus in the US, and dengue fever. It concludes that lack of scientific certainty should not justify postponement of preventative action but also encourages promoting the concept of relative risk: that there are other disease factors than climate change alone.
7. Incorporated by reference to this declaration and attached as Exhibit 6 to the Declaration

correct PDF copy of the following: ExxonMobil, *Global Climate Change: A Better Path Forward* (2000). This document acknowledges a “slight warming” and acknowledges that climate change “may pose a legitimate long-term risk, and that more needs to be learned about it.”

8. Incorporated by reference to this declaration and attached as Exhibit 8 to the Declaration of Julia Olson Supporting Plaintiff’s Response to API’s Motion to Withdraw is a true and correct PDF copy of the following: Letter from Kenneth P. Cohen, Vice President of Public Affairs for ExxonMobil to Lord Rees of Ludlow Kt PRS, President, The Royal Society (Sept. 25, 2006). This document acknowledges the major role of fossil fuels in carbon dioxide emissions and the linkage of economic development, energy supply, and climate change. This document recognizes the need for action to mitigate “serious impacts” of fossil fuel use on climate change.
9. Attached as Exhibit 2 to this declaration is a true and correct PDF copy of the following article: Juliet Eilperin, *Anatomy of a Washington dinner: Who funds the Competitive Enterprise Institute?*, Wash. Post (June 20, 2013), <https://www.washingtonpost.com/news/the-fix/wp/2013/06/20/anatomy-of-a-washington-dinner-who-funds-the-competitive-enterprise-institute>.
10. Attached as Exhibit 3 to this declaration is a true and correct PDF copy of a slideshow presentation presented by Bjorn Lomborg at AFPM’s (then NPRA’s) March 25–27, 2007 International Petrochemical Conference, arguing that cost of mitigating climate change is not justified because the “benefit” comes “*much* later.”
11. Attached as Exhibit 4 to this declaration is a true and correct PDF copy of: American

Low Carbon Fuel Standard. Professional Services Close-Up (May 16, 2012).

12. Attached as Exhibit 5 to this declaration is a true and correct PDF copy of: Oil Daily; Washington, *Refiners Doubt CO2 Climate Role* (Mar 26, 2007).

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 8th day of June, 2017, at Eugene, Oregon.

Respectfully submitted,

/s/ Julia A. Olson