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City of Arcata, CA, Santa Monica, CA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FRIENDS OF THE EARTH, INC., et al.,)	
)	Civ. No. C 02 4106 JSW
Plaintiffs,)	
v.)	Date: February 11, 2005
)	Time: 9 A.M.
PETER WATSON, et al.,)	Courtroom 2, 17 th Floor
)	
Defendants.)	

DECLARATION OF NORMAN L. DEAN

I, Norman L. Dean, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, declare the following:

1. I am the Executive Director of Friends of the Earth (FoE). Friends of the Earth is incorporated and headquartered in the District of Columbia. Friends of the Earth also has other offices, including an office in San Francisco, California.

1 2. Friends of the Earth, Inc. ("FoE") is a tax exempt, nonprofit
2 environmental advocacy organization founded in 1969 and incorporated in the
3 District of Columbia. FoE has approximately 30,000 members across the nation.
4 FoE's mission is to defend the environment and champion a healthy and just world.
5 One of FoE's programs is to encourage better stewardship of natural resources,
6 including reducing greenhouse gas emissions and controlling climate change.

7 3. Friends of the Earth, in collaboration with the member groups of
8 Friends of the Earth International in 70 countries internationally, promotes policies
9 and actions to control climate change, especially by addressing the use of fossil fuels
10 that produce greenhouse gases. One approach taken by FoE is to focus the
11 attention of the public, our members, and government decision makers on the
12 government financing and subsidies provided to fossil fuel use and combustion.
13 These subsidies are often funded with the use of taxpayer funds, including those of
14 our members. In doing this work, FoE has highlighted the impacts of international
15 financial institutions and export credit agencies in promoting climate change
16 through the subsidization of fossil fuel projects. FoE has also worked to address the
17 current imbalances in U.S. government tax and subsidy policies that provide
18 greater incentives for fossil fuel use as compared to the production of renewable
19 energy and other alternative energy sources that generate less greenhouse gas
20 emissions. In addition, FoE has highlighted the positive role that companies can
21 play in reducing the risk of climate change by pressing for corporate disclosure to
22 investors, including our members, of individual companies' potential contributions

1 to climate change. Among other actions taken by FoE to reduce the risk of climate
2 change are: promoting the use of more fuel efficient cars and others forms of
3 transportation; promoting the development, testing and installation of solar, wind
4 and other forms of less polluting energy; and by pressing businesses to use less
5 energy and build more efficient products.

6 4. Friends of the Earth publishes reports and articles on climate change.
7 These appear in separate publications, in our quarterly newsmagazine, and on our
8 web site at www.foe.org. One of the reasons we are seeking to compel the U.S.
9 Overseas Private Investment Corporation (OPIC) and the U.S Export-Import Bank
10 (Ex-Im) to comply with NEPA is to provide information that FoE can make
11 available to the public, our members, and decision makers in our various
12 publications.

13 5. Being a Plaintiff in this lawsuit is squarely within FoE's purpose as an
14 organization. As detailed by declarations filed with this Court, numerous FoE
15 members are adversely affected by climate change. In filing this case, FoE is acting
16 on behalf of itself as well as its members and their interests. The declarations filed
17 with this Court detail impacts to only a few of the many adversely affected FoE
18 members.

1 I declare under penalty of perjury that the foregoing is true and correct.

2
3 Date: 1/3/2005

4 71 2 9 J.
Norman L. Dean, Jr.