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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; et al.,

Defendants.

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

**DECLARATION OF NATHANIEL B. in
Support of Plaintiffs' Opposition to
Defendants' Motion for a Stay Pending a
Petition for a Writ of Mandamus**

**DECLARATION OF NATHANIEL B. in Support of Plaintiffs' Opposition to
Defendants' Motion for a Stay Pending a Petition for a Writ of Mandamus**

I, Nathaniel B., hereby declare and if called upon would testify as follows:

1. I am a plaintiff in the above-entitled action. I make this Declaration in support of Plaintiffs' Opposition to Defendants' Motion for a Stay Pending a Petition for a Writ of Mandamus. I have personal knowledge of the facts stated herein, and if called to testify, I would and could testify competently thereto.
2. I was 15 when this case was filed in August 2015. I am now 24. Since October 2018, I have experienced the worsening impacts of climate change caused by Defendants and have been harmed by the increasing severity of such impacts. This is not an exhaustive list of my experiences in the past six years, but a few to illustrate how my climate injuries worsen with more delay.
3. In December of 2021, my home state of Alaska experienced what our Department of Transportation referred to as "Icemageddon." Warm air brought an unseasonable rainstorm that dropped unprecedented amounts of rain and when temperatures quickly dropped again, the water converted into an inch of ice sandwiched between the snow. Icemageddon was predicted to increase wildlife mortality in Alaska, which our state saw the coming spring, with higher-than-normal mortality rates for a variety of animals including moose calves. During this storm, I was home from college on winter break and couldn't safely leave my house as my hometown of Fairbanks was trying to dig itself out of the effects of the storm and the roads were horrible. We lost power during the storm but thankfully it was not for very long



December 2021 Facebook Post.

and many other Alaskan residents had to suffer without power for much longer. These types of extreme and unpredictable weather events continue to worsen and make living in Alaska more difficult.

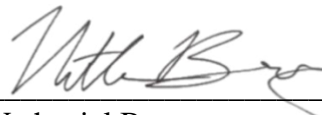
4. While I offer this declaration in my individual capacity and unaffiliated with my employment or the views of my organization, my job working for a Tribal non-profit corporation has exposed me even more to the frontlines of climate change in Alaska. The climate crisis has caused changes in caribou migration routes due to the changing weather patterns, growing parasitism, and contributed to the decimation of fishing on the Yukon River and other tributaries—which are the lifeblood of villages across that region. Reindeer herding, as a livestock production method and cultural way-of-life for over 130 years in Alaska native communities, is being harmed. I've been fielding calls from Tribal presidents who have been telling me their villages are urgently in need of reindeer because the caribou and salmon are no longer coming as they used to. I do not speak for the communities I work with who have been affected by climate change and have not personally experienced the loss of food systems in the way they have, but my work shows me every day the frontline impacts of climate change. It is emotionally hard to watch these traditional subsistence practices, which I am working to strengthen, so threatened.
5. I believe that the actions of Defendants continue to harm my state's future economic vitality, as Alaska, an Arctic state, experiences some of the most dramatic effects from climate change, but is also being incentivized to invest itself deeper into a uniquely fossil fuel-based economy by Defendants' unwavering commitment to promoting a national energy policy at odds with our nation, and Alaska's, future posterity. My state is one of the states that has borne the brunt of providing the nation's energy supply at the behest of

Defendant's energy policy. The longer this pattern continues, the worse off my state, and my opportunities for a livelihood will be.

6. 2020 was one of my darkest time periods. Our case was issued a divided opinion by the Ninth Circuit in January, COVID began in March, and then we were all stuck in our homes. During that period, I was in a dark place and felt hopeless about my future. I've been in therapy and currently attend therapy. Climate change is regularly a topic I bring to therapy. It's been so painfully clear that if a powerful interest doesn't want something to proceed, they have a litany of ways to stop it. In this case, we are up against our own Department of Justice and the executive branch of our federal government trying to keep us out of court, targeting us specifically with arguments they don't make anywhere else. I've wanted to practice law since eighth grade, but have found it increasingly untenable to watch Defendants throw up every unprecedented legal hurdle to prevent me and my co-plaintiffs from accessing our court, putting forward our evidence and seeking justice. I believe it is beneath the justice system I have faith in. While I am doing what I can, I need help from the courts to make sure that my fundamental rights are protected.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 1, 2024.

Respectfully submitted,



Nathaniel B.