

Ronald A. Shems (*pro hac vice*)
SHEMS DUNKIEL KASSEL & SAUNDERS PLLC
91 College Street
Burlington, VT 05401
802 860 1003 (voice)
802 860 1208 (facsimile)

Richard Roos-Collins (Cal. Bar no. 127231)
NATURAL HERITAGE INSTITUTE
2140 Shattuck Avenue, 5th floor
Berkeley, CA 94704
(510) 644-2900
(510) 644-4428 (fax)

Attorneys for Plaintiffs
Friends of the Earth, Inc., Greenpeace, Inc.
City of Boulder, CO, City of Oakland, CA
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.,)	
)	
Plaintiffs,)	Civ. No. C 02-4106 JSW
v.)	
)	Date: February 11, 2005
PETER WATSON, et al.,)	Time: 9 A.M.
)	Courtroom 2, 17 th Floor
Defendants.)	

DECLARATION OF JESSE WILLIFORD

I, JESSE WILLIFORD, declare as follows:

1. My name is Jesse Williford. I live in Raleigh, North Carolina.
My wife is Pam Williford. I am retired from a career with IBM and now
teach math at Wake Technical Community College. My wife works at home.
My wife and I are members of Greenpeace and Friends of the Earth.

1 2. My wife and I bought a building lot on Emerald Isle on North
2 Carolina's outer banks approximately twenty-five years ago. We hope to
3 build a home and retire there within the next couple of years. The lot is
4 located in the middle of the western side of the island approximately 1,000
5 feet from the ocean side of the island. The lot has an approximate elevation
6 of five to eleven feet.

7 3. My wife and I are concerned about the rising ocean levels,
8 increased storm surge, the increased frequency and severity of storms, and
9 increased erosion resulting from climate change. We may not have bought
10 the lot if, twenty-five years ago, we had known the dangers of climate change.
11 If we decide to build, we will have to design and build our home at
12 substantial additional cost to account for rising ocean levels, the resulting
13 erosion, increased storm frequency and severity, and storm surge caused by
14 climate change.

15 4. Although we have not yet built a home, my wife and I still visit
16 Emerald Isle regularly – at least twice a year – and we enjoy the aesthetic
17 value of the island's vegetation and its associated wildlife. We plan to return
18 to Emerald Isle in 2005. However, my wife and I are concerned about
19 Emerald Isle's vegetation. The increased frequency and severity in storms
20 and storm surge caused by climate change will adversely affect the trees and
21 vegetation and will damage the island's aesthetic value. This damage will
22 diminish our enjoyment of the island.

1 5. Additionally, we are concerned that the increased frequency and
2 severity in storms and storm surge caused by climate change will affect
3 Emerald Isle's water supply and sewage systems. I did not think that in our
4 lifetime or our kids' lifetime that a house in the middle of Emerald Isle would
5 be so affected, but now I know otherwise.

6 6. I believe that OPIC's and ExIm's actions increase the risk that
7 my interests and my wife's interests are and will continue to be harmed by
8 climate change.

9
10 I swear under the penalty of perjury that the foregoing is true and
11 correct to the best of my knowledge.

12
13 December 30, 2004

14 

15 Jesse Williford