

# Avery's statement of standing



## Avery McRae, 11, Eugene, Oregon

41. Avery's favorite activity is swimming in natural water bodies. Avery and her family enjoy boating, hiking, backpacking, camping, and watching salmon spawn throughout Oregon.

In recent years, Avery was forced to cut back these activities, because of record-setting summer heat, drought, low water levels, forest fires, and algal blooms. Avery also suffers from allergies, which will worsen with increased pollen count as the climate warms.

Avery enjoys taking vacations to Yellowstone with her family. She is saddened by burned, beetle-killed forests that she sees on these trips. Avery's first big backpacking trip with her family was postponed, because destruction of bears' forests caused an increase in hungry bears in the area.

42. Reduced snowpack from climate change threatens drinking water supplies for her and her family and their winter activities. Snowshoeing and sledding at Clear Lake were not possible from 2013–2015 due to lack of snow.

43. Avery enjoys eating seafood and going to the Oregon coast, where she wades in the water and explores tide pools. Her recreational experience is harmed by seeing coastal erosion and dead wildlife. Warmer water temperatures, sea level rise, and **ocean acidification** are caused by the Defendants' activities and will worsen and cause more harm in the future.

**ocean acidification:** occurs when carbon dioxide reacts with seawater to produce acid

### Personal values

### Harm claimed

DISCLAIMER: Statement was adapted from the complaint in *Juliana v. US*, and is not intended to be an exclusive description of the values and harms claimed by youth plaintiffs.



# Isacc's statement of standing



## Isaac Vergun, 13, Beaverton, Oregon

54. 2015 has been the hottest summer Isaac remembers, with temperatures at 100 degrees Fahrenheit in his hometown. The groundwater level in his backyard has dropped significantly, causing trees to die.

Isaac enjoys recreating along trails near Portland. He observed that the drought conditions have reduced most of the water in Johnson Creek. In parts of southern and eastern Oregon, wildfires are tearing through forests where Isaac enjoys recreating. Fires threaten the ecosystems that he relies upon for his personal enjoyment.

55. In winter, Isaac recreates in the Oregon snow and gains emotional, spiritual, and physical benefits. The record-low snowfall across the state harms Isaac, because it limits his opportunity for winter recreation.

The hotter weather, reduced snow and rainfall, and increased drought and wildfires are climate change impacts, caused by Defendants' actions.

56. Since he was very young, Isaac has had asthma. Isaac's asthma is worsening, and will continue to worsen, from air pollution due to increased pollen counts and smoke from wildfires.

Isaac enjoys athletic activities including hiking, soccer, and basketball. Increasing temperatures caused by Defendants' actions will worsen his asthma and make him less likely to play sports.

### Personal values

### Harm claimed

DISCLAIMER: Statement was adapted from the complaint in *Juliana v. US*, and is not intended to be an exclusive description of the values and harms claimed by youth plaintiffs.



# Jaime's statement of standing



## **Jaime Butler, 14, Flagstaff, Arizona**

65. Jaime is a member of the Navajo Nation. Since she was four years old, Jaime has been working to protect the Earth.

66. Jaime grew up on the Navajo Nation Reservation in Arizona. In 2011, Jaime and her Mother had to move Flagstaff, because the springs they once depended on year-round are drying up. They cannot afford to haul water for themselves and their animals.

Jaime is worried that her extended family on the Reservation will also be forced to move away from their land, because of climate change impacts caused by the acts of Defendants. This will erode her culture and way of life.

67. Jaime finds peace being outside in the forest surrounding her home, and she walks for 1–2 hours in the forest after school every day. Large parts of the forest have been destroyed by pine beetle infestations and forest fires, due to a warmer atmosphere. Jaime's walks are now limited.

In 2014, Jaime and her Mother were evacuated from their home for two days, because a canyon fire north of their property. Winds brought smoke and ash into their neighborhood. Jaime's severe allergies have become worse over the last several years. She takes over-the-counter medication to combat her symptoms.

Acts of the Defendants have caused record-setting temperatures and a drought that has lasted several years. Jaime fears for her future and for the future of her family, their history, their traditions, and their way of life.

## **Personal values**

## **Harm claimed**

DISCLAIMER: Statement was adapted from the complaint in *Juliana v. US*, and is not intended to be an exclusive description of the values and harms claimed by youth plaintiffs.



# Jayden's statement of standing



## Jayden Foytlin, 12, Rayne, Louisiana

86. Since Jayden moved to Louisiana in 2005, she has lived through three hurricanes and many more tropical storms. Hurricanes with high **storm surges**, flooding, and high winds are becoming more frequent and more violent with climate change, due to activities of the Defendants.

Jayden is also directly harmed by Defendants' support of fossil fuel development in Louisiana, which causes air and water pollution.

87. Defendants' approval of the dredging of canals through marshes for oil and gas exploration and pipelines has destroyed coastal marshes that protect the land from storms. Land loss results from increased erosion and saltwater flooding. In 2008, during Hurricane Gustav, Jayden's family lost power and water for a week.

88. The air and water pollution from oil and gas development in southern Louisiana threatens the health of Jayden and her family. Jayden and her family used to enjoy visiting the beach frequently, swimming in the Gulf of Mexico, crabbing, and eating seafood. She has avoided these activities since the BP oil spill, because BP's oil still washes ashore with each big storm.

Jayden enjoys traveling and visiting family friends all along the Gulf Coast in every state from Texas to Florida. The increased coastal flooding, storm damage, and land loss from climate change caused by Defendants' activities is limiting her ability to travel in this region and visit friends.

**storm surge:** a temporary sea level rise due to low pressure and wind from a storm

## Personal values

## Harm claimed

DISCLAIMER: Statement was adapted from the complaint in Juliana v. US, and is not intended to be an exclusive description of the values and harms claimed by youth plaintiffs.



# Journey's statement of standing



## **Journey Zephier, 15, Hawai'i**

68. Journey is a member of the Yankton Sioux Tribe. In 2009, Journey and his family moved to Hawai'i. Journey adopted the Hawaiian culture as his own. He has deep cultural and spiritual connections with the Earth and all life – and a deep sense of responsibility to protect the Earth for his generation and future generations.

69. Journey enjoys cultural activities like working in taro fields and organic farming. He also enjoys swimming, snorkeling, fishing, canoeing, stand-up paddle boarding, and walking and biking along the beach.

70. Journey's food security and his enjoyment of coral reefs and sea life are harmed by climate change impacts such as ocean acidification, sea level rise, increased sea surface temperature, changes in ocean circulation, and increased storm intensity – all caused by the acts of Defendants.

Rising sea levels harm Journey's health, personal safety, cultural practices, and recreational interests. For example, intense storms increase coastal flooding and erosion that damage coastal ecosystems, farming, farm buildings, and roads. Saltwater flooding in the farms and taro patches where Journey works reduces the yield of crops.

Decreased rainfall and sea level rise have caused poor water quality, high bacteria levels, and more shark activities in coastal rivers. This threatens Journey's health and safety and prevents his use and enjoyment of rivers. Less freshwater threatens Journey's access to drinking water and ability to stay on the island.

**ocean acidification:** occurs when carbon dioxide reacts with seawater to produce acid

## **Personal values**

## **Harm claimed**

DISCLAIMER: Statement was adapted from the complaint in *Juliana v. US*, and is not intended to be an exclusive description of the values and harms claimed by youth plaintiffs.



# Levi's statement of standing



## Levi Draheim, 8, Indian River Lagoon, Florida

82. Levi lives on a barrier island between the Indian River Lagoon and the Atlantic Ocean. The barrier island is mostly sand.

83. The island's beaches are Levi's backyard. Levi has seen how climate change harms the local ecosystems. Levi has noticed an increase in seaweed because of warmer temperatures. When the seaweed dies, it covers the island's beaches. Levi has a hard time enjoying beach activities, because the rotting seaweed smells like sulfur.

He has seen fewer sea turtles, and he can no longer swim in the Indian River Lagoon, because of more flesh-eating bacteria and dead fish. Levi and his family can smell the dead fish in their community. He is also limited by where he can swim in the Atlantic Ocean, due to more flesh-eating bacteria.

84. In July 2010, the City of Satellite Beach found a need to plan for sea level rise. The island's property and home prices are declining. Levi's family knows the property they own could be lost completely, due to sea level rise.

85. Experiencing nature and wilderness in healthy conditions is important for Levi's emotional wellbeing. Recently, Levi's severe allergies have made it harder for him to spend time outdoors. His fears for the future of the beaches and springs in Florida and the wildlife are causing mental and emotional harm to Levi.

**barrier island:** a long, sandy island lying parallel to shore that is built by action of wind, waves, and currents

### Personal values

### Harm claimed

DISCLAIMER: Statement was adapted from the complaint in Juliana v. US, and is not intended to be an exclusive description of the values and harms claimed by youth plaintiffs.



# Nick's statement of standing



## **Nick Venner, 14, Lakewood, Colorado**

89. Nick sees climate change caused by Defendants as a threat to human civilization. As a Catholic, he sees the connection between his church and environmental **stewardship**.

90. Nick and his family grow fruit trees, have a garden, and buy food from local farmers. More frequent and more intense hail, rainstorms, and drought and more pests, due to climate change impacts, have ruined their garden several years over the last decade. The unusual weather has changed Nick's diet from locally grown foods to less healthy food from distant sources.

Spread of pine beetles and more frequent wildfires from climate change, caused by activities of Defendants, have destroyed forests in Colorado. This has forced Nick to stop visiting some of his favorite places, where he used to go hiking, fishing, and camping.

Nick enjoys fishing, especially in Boulder Creek, but wildfires and irregular water flows from more frequent droughts and floods, due to climate change, has harmed fish and other river life. He has not been able to go fishing for the past three years.

Rising summer temperatures make it harder for Nick to enjoy outdoor activities, including hiking, biking, and tennis. Warmer winters mean Nick gets to ski less and, when he does go skiing, his favorite parts of the mountain frequently are closed.

**stewardship:** the work of taking care of something or someone

## **Personal values**

## **Harm claimed**

DISCLAIMER: Statement was adapted from the complaint in *Juliana v. US*, and is not intended to be an exclusive description of the values and harms claimed by youth plaintiffs.





# Zealand's statement of standing



## Zealand Bell, 11, Eugene, Oregon

36. Oregon's rivers are especially important to Zealand. While rafting, Zealand enjoys the solitude of the wilderness and seeing plants and animals in their natural habitat. Rafting trips with his family have been canceled or shortened due to climate change impacts from increased temperatures, drought, reduced water levels, and large forest fires.

37. Record-setting summer heat makes bike-riding, and playing soccer and basketball difficult. Zealand suffers from allergies, which have worsened recently.

He has been forced to spend less time outside. Heat waves and increasing pollen counts will worsen with further climate change and further harm Zealand's health and recreational interests.

38. Due to warmer winters and decreased snowpack levels in Oregon, Zealand was unable to ski and his mother was unable to work at the ski resort. Decreased snowpack levels will also limit drinking water for Zealand's family and community, as Eugene's only water source, the McKenzie River, is fed by melting snowpack.

39. At the Oregon coast, Zealand enjoys playing in the dunes, camping, surfing, boogie boarding, and taking pictures of the ocean and beaches. Warmer water temperatures, rising sea levels, and **ocean acidification** will harm Zealand's future ability to enjoy the areas that he loves and to eat the local seafood, which is an important part of his diet.

**ocean acidification:** occurs when carbon dioxide reacts with seawater to produce acid

### Personal values

### Harm claimed

DISCLAIMER: Statement was adapted from the complaint in *Juliana v. US*, and is not intended to be an exclusive description of the values and harms claimed by youth plaintiffs.

