DOCKETED	
Docket Number:	23-MISC-01
Project Title:	Offshore Wind Waterfront Facilities Improvement Program
TN #:	253456
Document Title:	Sakereh Carter (Sierra Club CA) Comments - CEJA, CAUSE, CBE, CCAEJ, & Sierra Club CA response to Offshore Wind Waterfront Facility Improvement Program & Grant Program
Description:	N/A
Filer:	System
Organization:	Sakereh Carter (Sierra Club CA)
Submitter Role:	Public
Submission Date:	12/1/2023 3:46:37 PM
Docketed Date:	12/1/2023

Comment Received From: Sakereh Carter (Sierra Club CA)
Submitted On: 12/1/2023
Docket Number: 23-MISC-01

CEJA, CAUSE, CBE, CCAEJ, & Sierra Club CA response to Offshore Wind Waterfront Facility Improvement Program & Grant Program

Additional submitted attachment is included below.

December 1, 2023

Eli Harland
California Energy Commission

RE: CEJA, CAUSE, CBE, CCAEJ, & Sierra Club CA response to Offshore Wind Waterfront Facility Improvement Program & Grant Program Design

Dear Mr. Harland,

The Regenerate California Coalition, a partnership between the California Environmental Justice Alliance and Sierra Club, represents communities disproportionately burdened by industrial pollution and fighting for equitable access to clean energy sources and healthy community-serving spaces. We are writing to you concerning the AB 209 Offshore Wind Waterfront Facilities Improvement Program. It is our hope and expectation that this program will improve life expectancy in communities living on the frontlines of industrial operations. Offshore wind projects, including associated port expansion, must bring benefits to communities and not result in additional burdens such as increased air pollution.

Although we commend the Energy Commission (CEC) for facilitating this initial AB 209 Workshop, we are deeply concerned by the lack of community voices and little to no representation of organized labor during this initial workshop. This lack of representation is entirely at odds with CEC's obligation to ensure meaningful community engagement and develop a framework to center equity and environmental justice in its work. In the comments detailed below we call on CEC to ensure port-adjacent communities' health and safety is prioritized. In addition, we urge CEC to invest in programs to strengthen community outreach by openly sharing information with impacted residents, especially those living in port-adjacent communities. CEC must also meaningfully integrate the community feedback that it gathers into the AB 209 Offshore Wind Waterfront Facilities Improvement Program, including feedback from impacted residents, Tribal Nations, and organized labor.

I: INTRODUCTION

The American Lung Association's 2023 State of the Air Report confirmed that Los Angeles and Long Beach are still in the top ten most polluted cities by daily particulate matter, the top five most polluted cities by annual particulate matter and are the number one most polluted by ozone.[1] The main culprit is diesel exhaust and the people most affected are Black and Brown people.[2] According to CalEnviroScreen, a mapping tool tracking cumulative impacts of pollution throughout the state, communities living near the Ports experience the highest pollution burden possible. Children and families living in Los Angeles and Long Beach neighborhoods are forced to breathe extreme levels of pollution while suffering from higher asthma rates and nearly a decade lower life expectancy compared to other residents in LA County. The Wilmington, Carson, and West Long Beach communities live in close proximity to major sources of pollution such as refineries, ports, neighborhood truck traffic, oil drilling/production, and busy rail yards nearby homes, schools, churches, and even hospitals.[3]

In response to AB 617, the California Air Resources Board established the Community Air Protections Program and developed a Community Emissions Reduction Plan for Wilmington, West Long Beach, and Carson, but air quality concerns remain, along with the negative health effects that come with pollution. The public has a personal stake in port development decisions that not only shape the design of our communities but also determine residents' life expectancy.

II. GRANT CRITERIA SELECTION

(a) Grant Criteria Development

Per Public Resource Section 25666 (a), the CEC is tasked with devising a program that supports waterfront infrastructure improvements to promote the buildout of OSW technology. We support the CEC's decision to implement this program using a grant-based model and emphasize that the grant selection process should apply more weight to projects that reduce cumulative impacts in port-adjacent communities. These include projects with decarbonization objectives, air quality monitoring protocols, community outreach and engagement plans, workforce planning strategies, and marine ecosystem mitigation measures.

CEC should prioritize projects that plan to use 100% zero-emission trucks and port equipment during project construction, operation, and maintenance. The buildout of OSW infrastructure across the state's waterfront facilities may unnecessarily exacerbate harmful toxicants, particularly in communities overburdened by pre-existing industrial operations. The Port of Long Beach and Los Angeles are significant emitters of harmful air toxicants, including diesel particulate matter, sulfur oxides, and nitrogen oxide, linked to carcinogenic outcomes and reproductive dysfunction in humans,

---

[1] American Lung Association State of the Air, https://www.lung.org/research/sota (2023).
[2] Gillingham, K. and Huang, P. (2021). Racial Disparities in the Health Effects from Air Pollution: Evidence from Ports. [online] Air Pollution: Evidence from Ports. NBER Working Paper No. w29108. Available at: https://ssrn.com/ abstract=3897544 (finding that one additional vessel in port leads to an additional 3.1 hospital visits per thousand Black residents within 25 miles of a port and 1.1 hospital visits for white residents).
[3] Mall, Amy and Bergen, Sujatha, Life Alongside Oil Infrastructure in Wilmington, CA, Life Alongside Oil Infrastructure in Wilmington, CA (nrdc.org) (October 25, 2021).

vegetation-harming acid rain, and potent global warming potential.[4,5,6,7] Research has shown that portside communities in Long Beach exhibit a near-decade reduction in life expectancy.[8] Notably, electrifying our ports can significantly reduce port-related pollution, and it makes logical sense to electrify port terminals as we connect more OSW energy to the electrical grid.[9] Therefore, the CEC must prioritize projects that utilize 100% zero-emission equipment and trucks to protect communities and the environment from polluting entities and maximize the benefits of OSW technology.

CEC should prioritize projects that expand clean energy port infrastructure. The CEC should leverage all clean energy infrastructure to protect portside communities from air toxicants, provide energy to underserved coastal communities, improve local climate resiliency, and divest from inefficient, polluting fossil fuel infrastructure. The Humboldt Bay Harbor District plans to construct ground-mounted solar, enhance green port initiatives, develop and implement microgrid projects, and devise a Green Terminal Plan.[10] However, other ports did not mention these strategies during the AB 209 Waterfront Improvement Facilities workshop. The CEC must prioritize port projects investing in distributed and community-scale solar and storage, batteries, and other energy upgrades for impacted communities to achieve port sustainability, community-centric energy empowerment, and health-protective benefits.

The CEC should select projects that plan to monitor air quality for all classifications (S/I, M/F, and O/M) of offshore wind-related waterfront operations. The CEC should prioritize projects instituting air quality monitoring systems to track port-related pollution, as retrofitting our waterfront facilities may release additional air toxicants. Air quality monitoring during the OSW buildout is paramount for detecting increases in air emissions, identifying pollutants of concern, and adjusting emissions-intensive port activities when necessary. The CEC should prioritize applicants utilizing the best available air quality monitoring technologies and backup systems for monitoring methods. Further, California has the infrastructure to use pre-existing waterfront facilities to deploy 25 GW of energy by 2045. Thus, the CEC should prioritize proposals that do not require the construction of new waterfront facilities, as these projects will inevitably increase air quality emissions. Ultimately, the CEC must prioritize applications that contain air quality monitoring plans and leverage current waterfront facilities to prevent superfluous toxic emissions in communities with multiple environmental stressors.

---

[4] US EPA, Ports primer: 7.2 air emissions (December 1, 2023).
[5] Weitekamp, Chelsea A., Lukas B. Kerr, Laura Dishaw, Jennifer Nichols, McKayla Lein, and Michael J. Stewart. "A Systematic Review of the Health Effects Associated with the Inhalation of Particle-Filtered and Whole Diesel Exhaust." *Inhalation Toxicology* 32, no. 1 (2020): 1–13. https://doi.org/10.1080/08958378.2020.1725187.
[6] US EPA, What is acid rain? (December 1, 2023).
[7] Tian, Hanqin, Rongting Xu, Josep G. Canadell, Rona L. Thompson, Wilfried Winiwarter, Parvadha Suntharalingam, Eric A. Davidson, et al. "A Comprehensive Quantification of Global Nitrous Oxide Sources and Sinks." *Nature* 586, no. 7828 (2020): 248–56. https://doi.org/10.1038/s41586-020-2780-0.
[8] Long Beach Department of Health and Human Services, City of Long Beach Department of Health and Human Services (2019).
[9] "Electrifying Ports to Reduce Diesel Pollution from Ships and Trucks and Benefit Public Health: Case Studies of the Port of Seattle and the Port of New York and New Jersey." International Council on Clean Transportation, (November 15, 2023).
[10] California Energy Commission, Staff Workshop on AB 209 Offshore Wind Waterfront Facilities Improvement Program (November 3, 2023).

The CEC should prioritize applications that include Community Engagement Plans, Community Benefit Agreements and Workforce Equity strategies. The Port of Humboldt has done its due diligence in making sure communities are at the forefront of OSW planning and implementation by taking the following steps:

(a) Approving a Project Labor Agreement
(b) Working closely with the County of Humboldt Economic Development Department, Cal Poly Humboldt, and College of Redwoods on a Workforce Development Strategy
(c) Actively engaging with seven different tribal governments in Humboldt every week
(d) Adopting a Community Engagement Strategy that establishes a Community Advisory Committee and Community Benefit Program[11]

Community Engagement

The CEC should include strong requirements for clear and robust Community Engagement Plans (CEPs) in all applications. CEPs should include documentation to illustrate history of engagement with local community members within a proposed port redevelopment or expansion. CEPs should demonstrate that applicants are not simply informing the public on what is being done but rather exemplify clear activities that will be taken to ensure in-depth, long-term, and meaningful engagement with impacted communities. Moreover, CEPs should require a minimum number of specific activities to be carried out and/or require that applicants quantify the number of community engagement activities that will be accomplished through their CEP. Providing baseline requirements for implementing certain community engagement activities (e.g., all funded plans must complete X number of Activity A) would allow applicants to demonstrate more high level community engagement. For instance, holding one or two public meetings or a few focus groups with ten people would be insufficient to demonstrate robust community engagement.

Workforce Equity

The offshore wind industry has the potential to financially empower historically disinvested communities by providing underserved populations with access to secure, high-paying, environmentally conscious occupations. Research has demonstrated that clean energy professions have higher wage-earning potential and are less contingent on educational attainment.[12] Further, a higher proportion of White individuals are employed in clean energy positions.[13] The offshore wind industry is vital for underserved communities that have been historically impacted by low-wage jobs, community disinvestment, racial discrimination in the workplace, and barriers to 'good' occupations.[14] To achieve workforce equity, the CEC should prioritize applicants that include the following workforce program elements:

(a) Prioritizes local, targeted hiring practices in underserved communities, living wage benefit requirements, and accessible job training opportunities
(b) Meaningfully engages with the local workforce by ensuring that underserved workers are involved in local decision-making with an emphasis on understanding historical inequities and workforce-driven solutions

---

[11] Ind [10].
[12] Advancing inclusion through Clean Energy Jobs - Brookings (December 1, 2023)
[13] Green Jobs Report - we act for environmental justice (December 1, 2023)
[14] Race and the Work of the Future: Advancing Workforce Equity in the United States, National Fund for Workforce Solutions (November 20, 2020).

(c) Provides services to laborers with limited English proficiency (LEP)
(d) Establishes partnerships with organizations that provide reentry services to formerly incarcerated individuals
(e) Supports the development of training services that accommodate full-time workers participating in training certifications, provides financial assistance to trainees, and contributes to transportation expenses
(f) Partners with local community-based organizations (CBOs) to maximize opportunities for underserved populations to access offshore wind occupations due to CBOs strong relationships with local communities[15]

The CEC should prioritize applicants who plan to use cutting-edge technologies to mitigate marine ecosystem harm. Echoing our marine conservation and indigenous allies, offshore wind activities should strive to avoid, minimize, mitigate, and monitor impacts on marine ecosystems.[16, 17] CEC must honor the concerns and demands of indigenous communities who have been stewards of coastal waters and its marine ecosystems for more than 10,000 years and continue to rely on it for sustenance. Floating offshore wind is a nascent technology that must be deployed carefully to ensure marine species aren't needlessly harmed, as the Pacific Outer Continental Shelf (OCS) is unique and biologically diverse. The CEC should prioritize waterfront facility projects that minimize port and vessel-related noise, avoid unnecessary lighting, and prevent discharge of OSW-related contaminants to marine waters.

(b) Environmental studies and review required for Category 1 AND 2 grants

PRC Section 25666 allows for four allowable uses of the funding for OSW waterfront improvements, including Category 1 and 2 grant funding for environmental studies and review. The CEC must prioritize environmental studies with minimal research to date, including studies investigating OSW-related waste, legacy pollution in formerly industry-heavy ports, and OSW-specific impacts on indigenous cultural resources.

The CEC should prioritize environmental studies that plan to investigate legacy pollution in ports with former industrial activity. The proposed OSW development site in the Port of Humboldt Bay, named the 'Humboldt Bay Heavy Lift Terminal,' is located on land that formerly housed a variety of lumber mills, plywood mills, and a cogeneration plant.[18] Humboldt Bay is also on the 303(d) list of contaminants for

---

[15] National Community Reinvestment Coalition, Workforce Development is a Solution to Climate Change and Income Inequality: NCRC's Comment on The EPA's Environmental and Climate Justice Grant Program, (April 10 2023).
[16] National Resource Defense Council et al. Comments of Outer Continental Shelf Offshore Morro Bay, California Wind Energy Area, Environmental Assessment [Docket No. BOEM-2021-0044-0061], available at https://www.morrocoastaudubon.org/p/conservation-corner.html
[17] Natural Resources Defense Council et al. Environmental Organizations' Joint Scoping Comments for the Humboldt Wind Energy Area Environmental Assessment (2021).
[18] Kalt, Jennifer, Dioxins In and Around Humboldt Bay: Slow but Steady Progress, the Northcoast Environmental Center (2020).

dioxins and polychlorinated biphenyls (PCBs).[19,20,21,22] Working on these sites can create ground disturbance and expose laborers to persistent, toxic compounds. Many OSW-proposed sites in Humboldt Bay have never been fully assessed for dioxins, metals, and other legacy pollutants. Therefore, the CEC should prioritize environmental studies to investigate the prevalence, extent, and remediation necessary to ensure workforce safety on these sites, as these locations must be appropriately remediated before commencing OSW activities.

The CEC should prioritize proposals investigating OSW-related waste and opportunities to reuse unrecyclable OSW components. The CEC should prioritize environmental studies that analyze the frequency of floating-OSW infrastructure oil leaks and novel reuse strategies for unrecyclable OSW components. For example, although 90% of OSW turbine components are recyclable, the blades, composed of fiber composites, are unrecyclable and contribute significantly to landfill waste at the end of the 25-year blade lifespan.[23] With an average rotor diameter of 430 ft and multiple turbines per farm, it's infeasible to landfill all of California's OSW blades.[24,25] Recent research has touted the opportunity for pyrolysis to recycle blades, but pyrolysis, another form of incineration, is a misleading solution for recycling OSW components.[26,27] Further, landfills and incinerators are disproportionately sited in predominantly Black neighborhoods.[28] Notably, Denmark has repurposed OSW turbines as protective bike shelters.[29] The CEC should prioritize environmental studies that investigate novel strategies for repurposing OSW components. Research has also demonstrated that OSW turbines and electrical service platforms can release significant amounts of oil from improper maintenance or malfunctions, posing a risk to the environment and populations that rely on marine ecosystems.[30,31] The CEC should track OSW-related waste as the state develops and deploys OSW infrastructure to prevent waste diversion to environmental justice communities. Prioritizing environmental studies investigating waste and OSW-component repurposing will place the CA at the forefront of the OSW industry, from construction and operation to decommissioning.

The CEC should prioritize environmental studies focusing on potential OSW impacts on marine ecosystems and indigenous cultural resources led by indigenous organizations. Federally and

---

[19] Humboldt Waterkeeper, Toxics Initiative (2023).
[20] California Coastal Commission, Humboldt Bay Critical Coastal Area (2019).
[21] County of Humboldt, Draft Environmental Impact Report, n.d.
[22] State Water Resources Control Board, 2020-2022 California Integrated Report (September 1, 2023).
[23] Office of Energy Efficiency and Renewable Energy, Wind Turbine Sustainability (n.d.).
[24] Office of Energy Efficiency and Renewable Energy, Wind Turbines: the Bigger, the Better (August 24, 2023).
[25] Bloomberg, Wind Turbine Blades Can't Be Recycled, So They're Piling Up in Landfills (February 5, 2020).
[26] International Pollutants Elimination Network, Chemical Recycling: A Dangerous Deception (October 2023).
[27] The Intercept, Unproven 'Advanced Recycling' Facilities Have Received Millions in Public Subsidies (October 31, 2023).
[28] Funes, Yessenia, The Father of Environmental Justice Exposes the Geography of Inequity, Nature 7979, S25-S29 (2023). https://doi.org/10.1038/d41586-023-02613-6
[29] Katsikopoulou, Myrto, Denmark is repurposing discarded wind turbine blades as bike shelters, Designboom (2021).
[30] Bureau of Energy Management, Environmental Risks, Fate, and Effects of Chemicals Associated with Wind Turbines on the Atlantic Outer Continental Shelf (2013).
[31] Gunter, Tim. *Potential Impacts from a Worst Case Discharge from a United States Offshore Wind Farm.* International Oil Spill Conference Proceedings 2014(1): 869-877 (2014). https://doi.org/10.7901/2169-3358-2014.1.869

non-federally recognized tribes are ecological experts and critical stewards of the environment that can identify, mitigate, and rectify disturbances in migratory routes, population density, and foraging behavior within our precious marine ecosystems. Research has shown that indigenous-managed land accounts for 80% of the remaining global biological diversity, demonstrating the importance of indigenous knowledge in conserving our natural resources.[32] The CEC should prioritize applicants that honor indigenous knowledge, provide resources to indigenous-led organizations to conduct environmental monitoring studies and provide optional compensation for tribes performing environmental monitoring tasks.

III: MAXIMIZE COMMUNITY BENEFITS ASSOCIATED WITH OFFSHORE WIND

Generally, community benefits are measures that are voluntarily incorporated into a development project and exceed requirements that municipalities can impose to mitigate project impacts or comply with regulations.[33] Although offshore wind projects have the capacity to produce clean, renewable energy, we are concerned that the activities that need to be undertaken to create wind turbines will be powered by fossil fuels which would only increase cumulative impacts in communities living near ports. Preparing for offshore wind staging and integration facilities may force portside communities to breathe more air pollution. Without strong mitigation measures, disadvantaged populations as defined by SB 535, in particular, will bear significant impacts, and more so than at the other potential port sites. In fact, the AB 525 Port Readiness Plan environmental evaluation and site ranking found that staging and integration and manufacturing/fabrication activities at the Port of Long Beach would have the greatest impact on disadvantaged populations compared to activities at other potential port sites.[34] Though not the "rigorous analysis that typically would be conducted for an environmental review document (NEPA and some CEQA documents)," the Demographic Index serves as a proxy for detailed analysis of potential project effects related to disadvantaged populations.[35] The potential impacts to disadvantaged populations, particularly those surrounding the POLB, raises concerns.[36] For this reason, it is vital that CEC require use of 100 percent ZE vehicles, equipment, and adequate charging infrastructure for offshore wind energy project construction, operation, and maintenance. Zero Emission mandates for offshore wind energy projects will help accelerate the much-needed transition to zero-emission port operations, and help the Port of LA and Port of Long Beach meet its Clean Air Action Plan goals.

We also urge the CEC to invest in a consistent environmental monitoring program and share that data with impacted residents in a way that is easily digestible. CEC must monitor air, soil, and toxic runoff to track pollution levels before and during offshore staging and integration, and manufacturing/fabrication facility operations. CEC should also ensure back-up systems for air quality monitoring and upgrade AQ monitors to the best available equipment every 5-10 years.

---

[32] Australia State of the Environment. National and international frameworks (2021).
[33] Hom, Khan, and Taecker. California Planning Roundtable, Best Practices for Implementing a Community Benefits Program (2017), https://cproundtable.org/infill/best-practices-for-implementing-a-community-benefits-program/.
[34] Cal. State Lands Comm'n, AB 525 Port Readiness Plan Final Report, at 89-90 (2023) (see Table 7.3, 7.5).
[35] Id. at 83.
[36] Port Master Plan Revised Draft Update at 90-91 (see Figure 5.9-1. Senate Bill 535 Disadvantaged Communities within the Port Vicinity; Figure 5.9-2 Assembly Bill 617 Wilmington, Carson, and West Long Beach Disadvantaged Community Boundary).

We also urge CEC to develop mechanisms to hold industry accountable to community commitments. CEC should work in coordination with local governments to monitor progress and compliance of project agreements in partnership with community-based organizations and local impacted residents. The priority should be to make sure members are included from start to finish and always have the power to independently enforce community benefits agreements. This should include careful planning for workforce equity training and hiring programs. CEC must prioritize local hiring, fair chance hiring practices, living wage benefits requirements, and equitable apprenticeship programs for impacted communities. Hiring practices should target historically marginalized and underserved portside communities. Supportive programs may include mentorship and training programs to prepare workers for offshore wind-related job opportunities, and supporting the development of human operated non-automated equipment/technologies.

Additionally, CEC should not only focus on expanding clean energy infrastructure, but also supporting the development of community choice aggregations to ensure historically marginalized communities are provided access to stable and clean energy sources. CEC should follow the lead of impacted residents and invest in community-serving projects like rooftop solar, battery storage, and grid upgrades when necessary.

IV: STRENGTHENED COMMUNITY OUTREACH & ENGAGEMENT

The Coastal Act provides the public "a right to fully participate in decisions affecting coastal planning, conservation, and development," and calls for coastal development planning processes to include "the widest opportunity for public participation." Although we thank CEC for conducting initial outreach with community-based organizations (CBOs) and environmental justice advocates, throughout CEC's offshore wind development process, many community concerns have not been addressed, and our suggestions for improved public process have largely been ignored.

In particular, we are disappointed in CEC's lack of communication and transparency on the release of the AB 525 Offshore Wind Strategic Plan which was slated to be available for public comment in July 2023 but has been consistently postponed without clear updates provided to CBOs who participated in meetings with CEC staff to discuss offshore wind. We strongly urge CEC to provide updates on the release of the Offshore Wind Strategic Plan, especially to the CBOs it has engaged with regarding offshore wind, and ensure there is adequate time provided for public comment.

Moving forward, CEC must ensure community members have consistent access to offshore wind project information including the scale of proposed projects, the size of the wind turbines being produced, the amount of acreage dedicated for wet storage, the scale of port expansion required to accommodate wind turbine staging and integration, and local air quality impacts such as expected increase in vehicle miles traveled by diesel-powered freight. In addition to providing access to project information, we urge the CEC to ensure consistent access to hybrid meetings, interpretation resources, and staggered meeting times to accommodate community members' busy schedules and work hours. Furthermore we thank CEC for recording the AB 209 Workshop and urge CEC to ensure all future meetings are recorded and made available for community members who are not able to attend virtual or in-person meetings.

For future in-person meetings, we encourage CEC to provide food,water, language interpretation services, and childcare to community members. These CEC meetings/listening sessions should also be prioritized for portside environmental justice communities and located close to community centers with adequate translation on meeting materials such as slides, notices, and flyers. In addition, these meeting resources must be in everyday language to ensure community members understand what is being communicated. We also urge the CEC to consider organizing evening town halls to share updates about offshore wind energy development, notices posted in community centers, and advanced warning for community meetings.

The CEC should consider partnering with CBOs that provide direct service, advocacy, and/or education to potentially impacted communities to lead community outreach and engagement. In order to achieve authentic community participation, the CEC should partner with local CBOs who already have established trust with the communities they serve. Low-income communities and communities of color are often excluded from policy and programmatic policies on clean energy development, lack information on major projects and developments, and have difficulty trusting programs that do not have community input from inception to evaluation. This is why the involvement of community leadership in outreach and engagement, and the expertise these groups provide, is critical for equitable offshore wind development.

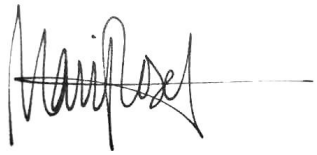
However, many of the ideal CBOs are under-resourced, under-staffed, and already managing many priorities. The CEC should partner with CBOs early and often and acknowledge that it may require months or years of work to establish trust and align intentions for outreach on offshore wind development. The CEC should provide CBOs with long-term, sustained funding, flexible scoping and timing arrangements, and consult CBOs in developing metrics to gauge success.

IV: CONCLUSION

In summary, we request a commitment to work with community stakeholders on sharing the CEC's AB 209 Wind Waterfront Facilities Improvement Program and designing meaningful public engagement processes in this and all future port land use decisions. We look forward to your response.

Sincerely,

Sakereh Carter
Senior Policy Strategist
Sierra Club CA



Mari Rose Taruc
Energy Director
California Environmental Justice Alliance (CEJA)

Lucia Marquez
Associate Policy Director
Central Coast Alliance United for a Sustainable Economy (CAUSE)

Ana Gonzalez
Executive Director
Center for Community Action and Environmental Justice (CCAEJ)

Shana Lazerow
Legal Director
Communities for a Better Environment (CBE)