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Environmental Justice and Climate Resilience

Dear Commissioners:

Thank you for the opportunity to comment on the Puente Power Project. I would like to express my opposition to the project on the grounds of environmental justice and climate resilience.

For too long, Oxnard has borne a disproportionate share of environmental burdens. A working-class community that is more than three quarters people of color, Oxnard is home to more coastal power plants than its nearby communities. Oxnard is subject to pollution risks already from agriculture and industry, and is within or above the 90th percentile for asthma rates in the state. In addition, the city passed a moratorium on new coastal power plants, which is not in its Local Coastal Plan because its LCP is in the process of being updated. Oxnard is a clear case of distributive environmental injustice and, and it is also a case study in participatory environmental injustice, or the inequitable participation and representation of people in environmental decision-making. As a life-long Ventura resident and an environmental justice intern in 2015 for Mayor Pro Tempore Carmen RamÃ-rez, Esq., I was moved by hearing community members (particularly youth members of CAUSE) speak out against this power plant project. The reasons they cited were diverse and included the need for renewable energy, the injustice of continued environmental racism, and the importance of preserving sensitive coastal habitat. There has been massive community opposition to the project, which even involved an overnight bus trip to the Public Utility Commission headquarters. These voices should not be ignored or marginalized, for to do so is to perpetuate participatory environmental injustice.

In addition to environmental justice, the Puente Power Project represents a poor choice in the context of climate change. The McGrath State Beach and Mandalay Beach already are susceptible to flooding already, and the city $\hat{a} \in T^{M_S}$ recent report on sea level rise and other coastal climate change related issues reveals serious threats from coastal inundation and storms. Despite NRG $\hat{a} \in T^{M_S}$ implication at a previous Oxnard hearing in 2015, the site has flooded as a result of an El Ni $\tilde{A} \pm 0$ storm in the past; according to an Army Corps of Engineers report issued at the time, the plant was not operational for months after storms and flooding in 1969. Instead of exploring coastal resilience options, this projects commits Oxnard to a power plant unsuited to the current and future conditions of its site.

This site and this power plant project are not the right choice for $Oxnard\hat{a} \in \mathbb{T}Ms$ coast. Instead of continuing the status quo, the California Energy Commission should listen to the opposition of Oxnard community members. Now, more than ever, we must be proactive in planning for more just, equitable, and sustainable futures $\hat{a} \in \mathbb{T}Ms$ and the Puente Power Project is not that future.

Sincerely, Anna Guasco Former Environmental Justice Intern to Mayor Pro Tempore Carmen RamÃrez, Esq., 2015 Bachelor of Arts in American Studies, Carleton College, 2016 Master of Science in Environment, Culture and Society, University of Edinburgh, 2017 (anticipated)