

## Extend the public comment period for the port expansion permits

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To: HearingComments, DNREC (MailBox Resources) <DNRECHearingComments@delaware.gov>

Dear Public Hearing Officer,

At a recent press conference in front of the old courthouse in historic New Castle, two champions of the fight against environmental injustice spoke about the environmental contamination along the route 9 corridor which includes predominately African American neighborhoods such as Dunleith, Simonds Gardens, Hamilton Park, Eden Park, Rosegate and Rosehill down into Southbridge, the Eastside, Riverside up to the extended Wilmington Port also known as DuPont Edgemoor site. In 2018 Governor John Carney entered into a 50 year lease agreement with a United Arab Emirates owned company called Gulftainer included in this agreement was a requirement that their would be a community benefits agreement and this agreement would address the environmental liability along the port and on the port including DuPont Edgemoor site. No official discussion has occurred as of yet.

I agree with the Delaware Community Benefit Agreement Coalition and have significant concerns about the planned expansion of the Port of Wilmington as it was outlined in three technical presentations at a public hearing held by the Delaware Department of Natural Resources and Environmental Control (DNREC) on September 29, 2020. (Docket#2020-P-Multi-0024)

? The planned dredging process to make the port accessible to larger cargo ships will release sediments from the river containing, PCBs, Dioxin, Arsenic, Thallium, ?at concentrations above human screening levels,? according to the Wilmington Harbor Expansion Environmental Assessment Technical Document (revised June 2020).

? Substantive participation by community residents has not occurred in the planning and review process. The health of Environmental Justice communities, which are largely African-American, People of Color and low-income are already severely impacted by the disproportionate placement of polluting facilities near and around their communities. These siting issues have not been adequately considered.

? All of the communities that ring the port, and are near it, will be impacted by an exponential increase in truck traffic, diesel pollution and the off-port development that will likely occur as businesses locate to be close to the port. The Community Economic Development implications of this growth has not been considered through a thorough and transparent process with community residents.

? Because there has been so little community access to the decisions and planning process for the port expansion, community concerns and ideas for how the expansion might be accomplished through a coordinated and cooperative process that benefits communities have been excluded. This is unacceptable and, in our analysis, not in accordance with required public participation guidelines.

I would like to state that I am not against development. I am extremely interested in development, as long as it does not cause harm to the health and wellbeing of the citizens or environment, is conducted in a transparent manner and deeply engages local residents as partners in the development/planning process.

The promise of jobs has been used over and over again as a hammer to get mostly Black, Brown and poor communities to accept developments that promise everything but historically under deliver with little accountability while compounding the decline in community health and life quality. These long-term consequences have exploded in Delaware during this Covid-19 pandemic and have revealed the lethal impact of a racialized development siting and permit approval apparatus.

I am requesting an extension of the Public Comment period by at least 60 days.

The current deadline of November 1, 2020 does not give residents adequate time to review detailed technical documents that the September 29 presenters had many, many months to craft with deep levels of participation by State government, before giving communities, essentially 30 days to make decisions on a port development that will impact their lives, families and potentially their health for decades. The process must be extended by at least 60 days for any level of fairness or real public participation to be claimed.

Sincerely,

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This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at [core.help@sierraclub.org](mailto:core.help@sierraclub.org) or (415) 977-5500.