

## **DELAWARE COMMUNITY BENEFITS AGREEMENT COALITION PUBLIC COMMENTS ON PORT EXPANSION IN WILMINGTON, DE**

The Delaware Community Benefits Agreement Coalition (DCBAC) is comprised of members and allies representing a diverse cross-section of the Delaware community. Current members include local residents, activists, civil rights organizations, environmental organizations and other allies. DCBAC is seeking community participation in the planning and assessment of the port expansion in Wilmington. DCBAC wants transparency, more public hearings, and a binding Community Benefits Agreement developed with DCBAC its member organizations and impacted community residents. We want safeguards from potential environmental, health and displacement dangers that could result from a project that is seeking permits/approvals without addressing community concerns.

DCBAC supports development. We simply believe that development should not be done in a vacuum and that the voice, lives and health of impacted communities and the environment must be given at least the same level of importance as industry and commercial interests.

We have concerns about the planned expansion of the port in Wilmington by Diamond State Port Corporation (DSPC), as it was outlined in a Department of Natural Resources and Environmental Control (DNREC) Public Comment hearing held on September 29, 2020 (#Docket #2020-P-Multi-0024). Three detailed plans were presented, with communities given only one month to respond to very technical information. DCBAC and other groups voiced their concerns and the comment period was extended for 30 days to December 1, 2020. We are requesting a written response from DNREC on each of the requests listed below:

- 1. Establishment of an inclusive development/planning process**
- 2. A binding Community Benefits Agreement developed with DCBAC and its impacted community residents**
- 3. Protections from potential health and environmental dangers as well as safeguards against existing resident displacement due to port-related land use issues, in advance of permit approvals**
- 4. Additional Public Hearings on the port expansion**

We are not against development. Many members of the communities near and around the port have experienced years of under and disinvestment. We are therefore interested in development, as long as it does not cause harm to the health and wellbeing of citizens or environment, is conducted in a transparent manner and deeply engages local residents as partners in the port expansion.

The disproportionate and unchecked siting of polluting facilities in and near people of color and low-income communities is well-documented. Black communities near the port already suffer from high rates of cancer, and respiratory ailments. These pre-existing conditions have resulted in higher death rates during this Coronavirus Pandemic. The result of this environmental racism is that Black communities have often been used as Sacrifice Zones.

Toxic compounds like Dioxin and Arsenic will be released during the dredging process to deepen the Delaware River for the port expansion. Communities have not been included in essential discussions about the potential impact of increased diesel emissions from trucks or possible neighborhood disruptions from off-port development. This is not right.

Again, we see development as important and practical when it fully considers the needs of communities and is conducted in a collaborative manner that addresses community concerns about short and long-impacts to health, the environment, potential displacement issues and has clearly spelled out mitigation guidelines detailed in a binding Community Benefits Agreement. Several areas in the nation have approached port expansion with communities as partners. The DCBAC is seeking the same kind of inclusion here in Delaware. The DCBAC is communicating with the Environmental Protection Agency (EPA) and the EPA is supportive of collaborative port planning models. We look forward to your written response to our requests.

Executive Committee Members  
Jeffrey Richardson, Chairperson  
Marie Reed, Vice Chair  
Jeanette Swain, Treasurer  
Mujahid Nyahuma, Treasurer  
[info@delbac.org](mailto:info@delbac.org)

Submitted 12/1/2020