

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

Susan Mack (MSM1620@aol.com) Sent You a Personal Message <automail@knowwho.com>

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

Dear Public Hearing Officer,

I attended the public hearing on September 29th and agree that the community needs more time to digest the port expansion plans presented at the hearing and that more meaningful engagement needs to occur before permits are issued by the State. This is an enormous project that will affect the surrounding communities for decades into the future. Consolidating all three permits into one hearing and the seeming rush to get them approved does a disservice to the many Delaware residents who will be impacted by the project. I am not against a container port at the location, but it is very important that any permits include specific and meaningful provisions to protect the health, safety, and environment and ensure that the residents most affected will also benefit from the port expansion plans. A more informative and interactive workshop(s) need to be held to detail the plans for local residents before DNREC and the governor move forward with consideration of these permit applications.

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,

Susan Mack  
2309 Macdonough Rd  
Wilmington, DE 19805  
MSM1620@aol.com  
(302) 528-5139

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