

TO: United States Coast Guard
ATTN: Donna Fisher

Re: PUBLIC NOTICE D01-209-2024 PROPOSED REPLACEMENT OF THE NEWARK BAY-HUDSON COUNTY EXTENSION BETWEEN INTERCHANGES 14 AND 14A (EXTENSION) INCLUDING THE VINCENT R. CASCIANO MEMORIAL, NEWARK BAY BRIDGE (NBB) ACROSS NEWARK BAY, MILE 3.8, BETWEEN NEWARK, ESSEX COUNTY AND BAYONNE, HUDSON COUNTY, NEW JERSEY

Dear Commander Fisher,

The Ironbound Community Corporation (ICC), the New Jersey Environmental Justice Alliance (NJEJA), and the South Ward Environmental Alliance (SWEA) submit comments regarding the proposal of the plans to replace and expand bridges by the New Jersey Turnpike Authority.

The Ironbound Community Corporation is an organization founded in 1969 that aims to empower and uplift an array of different people, families, and groups to create and sustain a thriving and just community. The ICC's Environmental Justice and Community Development Team works to push systemic change and environmental justice not only in our communities but for everyone. Since our founding, we've worked to provide nurturing spaces for educating both our children and community members in awareness of environmental issues and encouraging engagement in pursuit of instilling the right to clean air and green spaces where industrialization has considered people's backyards as dumping grounds.

The New Jersey Environmental Justice Alliance (NJEJA) is a statewide environmental justice (EJ) organization, training, mobilizing, and serving other EJ organizations, communities, and individuals to increase the quality of life and upward mobility opportunities for EJ communities (low-income communities and communities of Color). As the only statewide organization exclusively working on EJ issues, our board, staff, and membership is predominantly people of Color, and our work centers on the understanding that our membership and communities experience disproportionate environmental burdens as a result of a long history of systemic racism. Grounding of our work is the foundational belief that a community's vision and desire for the future should guide any political, infrastructural, or strategic development.

The South Ward Environmental Alliance (SWEA) foundation is based on the Jemez Principles for democratic organizing which include the following principles, Be Inclusive, Emphasis on Bottom-Up Organizing, Let People Speak for Themselves, Work Together in Solidarity and Mutuality, Build Just Relationships Among Ourselves and Commitment to Self-Transformation. SWEA is an alliance of residents and community-based organizations with a focus on environmental justice issues in the South Ward of Newark, New Jersey. SWEA was founded in

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2015 by Kim Gaddy, a mother of three asthmatic children with 20 years of experience as an Environmental Justice Organizer. SWEA's mission is to cultivate healthy and vibrant neighborhoods by ensuring residents' voices are heard, and they are active participants in decision-making policies that impact their neighborhoods.

NJEJA, SWEA, and the ICC have worked as a collective in the advocacy of environmental justice communities in New Jersey and nationally. We've engaged as stakeholders in coalitions such as the Coalition for Healthy Port and as members of the Environmental Justice Advisory Council (EJAC) for the Department of Environmental Protection (DEP). We've garnered decades of expertise through our work to ensure just and engaging community development.

We are writing as representatives of the environmental justice communities that the proposed replacement of the Newark Bay-Hudson County Extension will impact. We are deeply concerned about the potential negative and disproportionate impacts on overburdened communities in the area. The environmental assessment of this project provided to the Coast Guard by the NJ Turnpike Authority has not provided sufficient analysis in examining the potential risks to EJ communities that may arise. Furthermore, there has not been sufficient engagement with environmental justice communities in the area, who will have to bear this project's environmental and pollution burdens. For these reasons, we urge the US Coast Guard to reject this project and prioritize environmental justice in its decision-making process.

The purpose of this project is to demolish and create new bridges to fix the Newark Bay Bridge which is in a state of disrepair. It is evident that an influx of traffic has brought more pressure onto our bridges. Indeed, traffic and community safety has become a valid concern, one which we share. However, the clear lack of intentional and active community engagement for this plan to alleviate the deterioration of the bridge shows a deficiency in the Turnpike Authority's strategy for this project. In the sole meeting between community groups and the Turnpike Authority, we expressed our understanding of the urgency for improvements of the bridges but highlighted our concerns regarding the impacts of the proposed plans they set forth, particularly how the expansion of these bridges will lead to further congestion in the cities that these commuters and trucks will be driving through. These cities are disproportionately environmental justice communities that already face high levels of toxic air pollution and see a myriad of negative health outcomes as a result of these emissions.

The Ironbound and the South Ward have seen these impacts firsthand, as our communities lay in the midst of multiple highways, three fossil fueled power plants ([with the proposal of a fourth](#)), and New Jersey's largest incinerator. Our community members all agree: turnpike expansion is not the solution. Our local municipalities have expressed similar sentiments. Both mayors in the cities of [Newark](#) and [Jersey City](#) have vocally opposed this plan, acknowledging its inevitable increase in traffic, pollution, and continued overburdening of environmental justice communities. The demolition and expansion of the Newark Bay Bridge (NBB) does not address the highway

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widening and insidious congestion near the entrance to the Holland Tunnel where eastbound lanes merge down to just two. This congestion is a result of our distrust and low reliance on mass transit. In a time where increased demand for efficient modes of transportation is apparent, investing in the improvement of our public transportation should be paramount.

Furthermore, there are additional factors that have not been considered, in both the strategy of this proposal and in the environmental assessment. The New Jersey Turnpike Authority has not considered the environmental impacts that come with the first phase of their project: demolishing the NBB, then rebuilding and expanding it. This project has demonstrated no consideration for Newark Bay [which has historically been a dumping ground for toxic industry and facilities nearby](#). Although the NJTPA has claimed that its proposed project will benefit surrounding communities, they have failed to take into consideration how environmental stressors on the Bay will lead to increased burdens for environmental justice communities. With the demolition of the Newark Bay Bridge, environmental justice communities will succumb to increased levels of pollutants including but not limited to fine particulate matter and carbon monoxide. The construction of a new bridge without proper mitigation measures could further exacerbate existing issues in health and quality of life for the surrounding areas. We have seen examples of this throughout the country such as [Los Angeles](#), where their canceled expansion of Route 710 was discovered to be in violation of the Clean Air Act by the Environmental Protection Agency. This cancellation came after Los Angeles already endured the repercussions of expansion to appease demand with their project to widen Interstate 405, only to be back with the same issues of traffic.

With the demolition and rebuilding of the bridge being a high concern of this project, it's important to address considerations to quality of life, including the further deterioration of air quality, noise pollution, and the continued congestion of vehicles as a result. The neighborhoods surrounding these bridges are frontline communities that have dealt with the ramifications of continuous industrialization and construction to alleviate truck and vehicular traffic at the expense of their health. This is a contributing factor to the high rates of respiratory issues that have been seen in Newark, where twenty-five percent of Newark's children have asthma, which is three times the state average. This project leaves a disproportionate burden on the communities they're encroaching on.

Some of the pollutants of high concern include greenhouse gasses, fine particulate matter (PM) 2.5, PM 10, and carbon monoxide. [These pollutants have been projected in studies to emit more than double in their heaviest construction years](#). It is critical to note that there is no lower threshold for health benefits when it comes to fine particulate matter. Furthermore, exposure to PM has been shown to lead to numerous negative health outcomes including cardiovascular disease, lung cancer, pulmonary disease, and premature death. We implore the US Coast Guard to recognize that this project's impacts must be measured in combination with the additional burdens that EJ communities already face, including high respiratory illness rates, higher levels

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of pollutants such as greenhouse gas emissions, and further subjugation of overburdened communities.

We urge the U.S. Coast Guard to reject the bridge permit application as well as the environmental assessment of the proposed replacement of the Newark Bay-Hudson County Extension, emphasizing the importance of mitigating negative impacts on overburdened communities. The project has not sufficiently demonstrated its ability to minimize risk or recognized the cumulative impacts and disproportionate environmental burden that EJ communities already face. It's imperative to acknowledge the importance of prioritizing environmental justice in infrastructure projects like this. For these reasons, in addition to the vocal opposition to this project by community leaders, organizations, and elected officials, this project should not move forward. We urge the U.S. Coast Guard to honor the voices of those most vulnerable to environmental harm, who have voiced their firm opposition to this project and demand a say in shaping policies that affect their lives. The U.S. Coast Guard must consider the cumulative impacts of this project on vulnerable communities and ensure that adequate safeguards are put in place to protect their health and well-being.

Ironbound Community Corporation
New Jersey Environmental Alliance
South Ward Environmental Alliance