



NEW JERSEY ENVIRONMENTAL JUSTICE ALLIANCE

September 19, 2024

**Chairman Tucci and Members of the Passaic Valley Sewerage Commissioners
Passaic Valley Sewerage Commission
600 Wilson Avenue
Newark, New Jersey 07105**

Re: Passaic Valley Sewerage Commission Power Plant Permit Application

Dear Chair Tucci and Members of the Passaic Valley Sewerage Commission,

On behalf of the environmental justice communities that we serve and support, the New Jersey Environmental Justice Alliance respectfully submits this letter to urge you to withdraw your permit application to build a fourth power plant in the Ironbound community in the City of Newark, and we call upon you as Commissioners to vote no on this proposal.

The New Jersey Environmental Justice Alliance (NJEJA) is a statewide organization mobilizing other environmental justice (EJ) organizations and individuals to improve the quality of life for EJ communities (low-income communities and communities Of Color), many of whom experience additional burdens resulting from histories of systemic racism. Our work covers a wide range of areas, but the principles and values of environmental justice practices are at the center of all we do, and we believe that the community's vision of improvement will always be the most effective and is an important part of strategic development.

As part of a community-centric vision, we have developed a long history of partnership and solidarity with the Ironbound Community Corporation (ICC). We have worked with ICC at the local, regional, state, and national levels including opposing the construction of additional power plants which would contribute to the degradation of the health and environment of EJ communities in Newark. As part of this collaboration, we successfully passed the N.J. Environmental Justice Law in 2020 which addresses the cumulative impacts that EJ communities must navigate. Furthermore, with our central office in Newark, many of our board members and staff members have lived, worked, and built up relationships with community members in Newark and the Ironbound Community.

We unequivocally stand with the Ironbound Community Corporation and other individuals and organizations across the state who have urged the commission to vote no on this harmful project.

The Ironbound Community is, by definition of the 2020 Environmental Justice Law, an environmental justice community and has been continuously sacrificed for the sake of industry, capital, and economic gains. A fourth power plant would exacerbate the risks that this community already faces on a daily basis. We cannot continue this centuries-old pattern of prioritizing profit over people.

For months, if not years, the residents of Newark have opposed the construction of an additional power plant in their city due to valid health concerns. High rates of asthma, cancers, cardiovascular diseases, and reproductive issues already plague the Ironbound community. Moving forward with this project would be a direct and disrespectful disregard for the health of the people who live, play, and work in this community. It would continue the harms of environmental racism and exacerbate the climate crisis.

Better solutions to fossil-burning power plants not only exist but are readily accessible for implementation. They have been highlighted by a number of organizations and individuals, including our partners at Earthjustice who submitted a joint letter with the Ironbound Community Corporation. In lieu of a power plant, which would extend our reliance on fossil fuels and delay our transition to renewable, cleaner energy, we urge you to consider:

- Implementation of on-site battery storage to serve as standby power in an emergency situation,
- Coordination with Newark Energy Center to draw additional power during an emergency,
- Developments in grid resiliency post-Hurricane Sandy, which have decreased potential risk in emergencies,
- Discrepancies between estimated megawatt usage versus existing megawatt data, which can affect emergency planning situations, and
- Inconsistencies between the permit application and the AO25 statement.

Furthermore, we encourage you to consider the role of cumulative impacts in your analysis. As we have written in previous letters, a formal definition of cumulative impacts can be considered the following: “The risks and impacts caused by multiple pollutants, both individually and when they interact with each other and any social vulnerabilities that exist in a community. The pollutants are usually emitted by multiple sources that are sited within a community.”

In this case, we know that running a fourth power plant - even for a short time - would exacerbate local air pollution issues and contribute to the emission of toxic greenhouse gas co-pollutants. The importance of addressing cumulative impacts was highlighted in the 2020

Environmental Justice Law. The relationship between this law and the proposed power plant cannot be overstated. The City of Newark, and more specifically the Ironbound community, see disproportionate impacts from multiple sources of air pollution (See *Fact Sheet for the Hess Energy Center [Program Interest Number 08857, Permit Activity Number BOP11000, New Jersey Department of Environmental Protection]*). The proposed fourth power plant would be another contributor to these impacts.

The New Jersey Environmental Justice Alliance stands in solidarity with the Ironbound community, elected officials, and community groups in their vocal opposition to a fourth power plant in the City of Newark. We urge you to reflect on their decision and what kind of legacy they want to leave behind. As public servants, it is incumbent upon you to prioritize the community, their health, and the local environment in your decision-making processes. The East Ward community has been clear: vote no on this project. It is clear that the Ironbound community deserves better.

To:

Liz Calabrese, Commissioner, PVSC
John Cosgrove, Commissioner, PVSC
Lawrence Crump, Commissioner, PVSC
Joseph Isola, Commissioner, PVSC
Hector Lora, Commissioner, PVSC
Brendan Murphy, Commissioner, PVSC
Luis Quintana, Commissioner, PVSC
Gregory Tramantozzi, Commissioner, PVSC
Thomas Tucci, Commissioner, PVSC

Signed:

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