List of Draft Environmental Assessment (DEA) objections (prepared by Coalition for Healthy Ports)

The U.S. Coast Guard (CG) must conduct a more comprehensive Environmental Impact Statement (EIS) because the Draft Environmental Assessment (DEA) fails to take a hard look at the direct and indirect impacts of raising the Bayonne Bridge 63 feet above its current height.

Environmental Justice Impacts
1. A robust analysis of the environmental and Environmental Justice (EJ) impacts is needed. The Coast Guard’s EJ analysis is very narrowly limited to the very few census tracts immediately adjacent the bridge and does not include any of the EJ communities impacted within the larger vicinity of the bridge as well as the port adjacent communities that will bear the brunt of the increased cargo from the new bridge.
2. The EJ analysis even in its most narrow format does not conform to the standards outlined in the NEPA guidelines for preparing an EJ analysis. There is no analysis of the existing environmental and health conditions in the communities close to the bridge or impacted by the cargo volume increases. There is no analysis of how the existing vulnerabilities may be exacerbated by congestion, construction and other activities associated with raising the bridge.
3. The direct and indirect impacts of raising this bridge will be born disproportionally by minority, low-income communities and businesses near Port Newark and Elizabeth and the Bayonne Bridge. Yet the Coast Guard has not taken any steps to ensure that EJ communities are adequately notified, included or participating in the review process.

Public Process & transparency
The public participation process has been a dismal failure.
1. Minority, low-income communities and businesses have not been given enough time or resources to review and comment on the Project.
2. The needs of non-English speakers have been ignored. The Draft EA documents have not been translated into any other languages and public notices have not been made available to the public in other languages, particularly Spanish which is prevalent in all the EJ communities in Bayonne, Staten Island, and Newark.
3. Public documents have not been provided to the public. There are outstanding requests to the Coast Guard for critical documents that will help elucidate the concerns around the bridge construction – but the Coast Guard has refused to release these documents for public review prior to the comment period.
4. Residents in Newark had to press publicly for an extension and a public hearing in Newark and even then only a 15 day extension was granted rather than the 45 days we requested to allow for a thorough review of the draft EA. Residents and communities do not have the resources and the expertise available to the Port Authority and the Coast Guard – the applicant had months to prepare the draft EA and communities will only have 60 days.

Indirect Impacts & Growth Analysis
Against all logic, the DEA concludes that there will be no increase in cargo volume over “background” growth.
1. The DEA incorrectly concludes that there will be no significant change in total cargo or cargo distribution and thus no air quality impacts from the diesel trucks despite:
2. PANYNJ is spending approximately $1B on the project and justified the Project at the outset by stating that cargo volume will be diverted without the Project.
3. The US Army Corps agrees that cargo will be diverted from the Port if the project is not completed.
4. PANYNJ conceded, when it conceived the project, that an EIS would be needed.
5. EPA believes an increase of cargo and environmental impacts can be expected, and the proper analysis has not been done. EPA has documented their objections to the Port Authority’s growth analysis assertions – these comments are not reflected in the draft EA.
6. We have extensive evidence that the bridge project will significantly increase cargo volume and truck traffic through the ports and port adjacent communities and we can show the already existing cumulative impacts of pollution and health impacts in these EJ communities near the ports.

Other localized and quality of life impacts
1. Air Quality, noise and hazardous materials impacts have not been adequately addressed due to construction and increased port traffic from the Project.
2. Small and minority businesses need help to mitigate the impact of the construction and long-term impacts.
3. The DEA ignores the current health conditions of the vulnerable communities that will suffer from the environmental health impacts due to increased diesel truck traffic and the construction.