Comments on Draft Environmental Assessment for Proposed Modification of the Bayonne Bridge Across the Kill Van Kull Between Bayonne, Hudson County, NJ and Staten Island, Richmond County, NY (Docket No. USCG-2012-1091)

Submitted February 13, 2013 by: Amy Goldsmith, Chair, Coalition for Healthy Ports (CHPs)

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My name is Amy Goldsmith, Chair of the Coalition for Healthy Ports (CHPs). We are a bi-state alliance of environmental activists, truck drivers, faith leaders, labor unions and community advocates fighting for environmental and economic justice at the ports of New York and New Jersey. The Coalition for Healthy Ports is the East Coast arm of the Coalition for Clean & Safe Ports. I am also the State Director of the New Jersey Federation, state chapter of national Clean Water Action – the largest environmental organization in the state with 150,000 individual members, 75,000 email alert subscribers and 100 member groups.

Families suffer from many illnesses including 1,535 times the USEPA "acceptable" diesel-related cancer risk. Diesel-related healthcare costs are significant - estimated at \$10.8 million for Essex County alone) with lost work days valued at \$1.5 million per year in the same county*. According to UMDNJ, Newark's hospitalization and death rates are double that of Essex County suburbs. This is an environmental, economic and health injustice that has not been address on a broad scale and certainly not relative to the impacts of the Bayonne Bridge raising and goods movement. *Source: Clean Air Task Force, NJEF report February 2005 based on USEPA methodology and then most recent 1999 data

At Port Newark, the workforce consists of only 8% of Newark residents. In contrast, local residents are 18% of the workforce at the Port of Los Angeles. With Newark's official unemployment rate at 15.6%, Newark experiences disproportionate and adverse impacts of the port with few economic benefits.

The annual revenue of Sealand Maersk is \$25 billion while the average household income of Newark families with children is \$27,000. A port driver does not do much better with an average annual wage of \$28,000. You cannot expect their wages to be sufficient to keep their families, communities and workplaces free of port diesel and other related pollution harms.

The Port Authority seems to have the money to commit to raise the Bayonne Bridge, an estimated at \$1 billion and \$28 million for a failed truck loan program. PNCT is now spending \$500 million to expand its terminal. Yet the will and money set aside to engage the community in a full and meaningful decision-making process as well as mitigate the impacts of port diesel and other port harms is virtually ZERO.

It is time for the US Coast Guard and Port Authority to stop running rough shod over the health and well being of port-adjacent communities where residents of low income, many languages and races live. The Coalition for Healthy Ports is actively considering litigation or suing the US Coast Guard based on the decision made regarding this permit. We will not make that decision until the permit is issued. Our goal is to get justice, clean air, healthy neighborhoods and good jobs for residents affected by port-related activities. Save taxpayers money and residents their health, by doing the right thing the first time and we will all have clean air, port that stays competitive, and Bayonne Bridge raised on a timely basis.