



To: DRBC Commissioners
Re: "RESOLUTION providing that the Commission's review of the Port of Wilmington Edgemoor Expansion project for consistency with the Comprehensive Plan...".
Date: August 11, 2020

Regarding the "RESOLUTION providing that the Commission's review of the Port of Wilmington Edgemoor Expansion project for consistency with the Comprehensive Plan may be accomplished largely within the context of the coordinated permit processes led by the Delaware Department of Natural Resources and Environmental Control and the U.S. Army Corps of Engineers" the Delaware Riverkeeper Network would like to urge the Commissioners to vote no on this resolution and instead commit to undertaking its own independent review of this project.

This is a very controversial issue with members of congress in New Jersey and Pennsylvania already expressing concerns about the project benefitting from reduced oversight due to pending federal legislation. It is not wise to further reduce oversight of the project by limiting DRBC's independent participation in its review and thereby also limiting the opportunity for public engagement. Reducing DRBC's role in the process is also going to strain the ability of people in Pennsylvania and New Jersey, who will be impacted by this decision, from having a full and fair opportunity to be involved.

The proposed Port of Wilmington Edgemoor Expansion project will have significant and foreseeable coastal effects on New Jersey and Pennsylvania as well as Delaware. It could have significant water quality ramifications depending on the dredging operations and the final disposal of dredge spoils that will impact the estuary region. It will have serious implications for a variety of species including eels, shad, striped bass and sturgeon that are ecologically, and in some cases economically, important to our River and region. The proposed fans are not common technology for our River and when proposed for projects in the past have been soundly opposed by a variety of voices – it is important that this kind of new technology get the independent vetting by DRBC review.

DRBC's independent review is critical for ensuring an objective regional review and response. Simply providing input into the Army Corps and the State of Delaware reviews will not ensure that the regional watershed perspective is given independent consideration.

If DRBC stays committed to the path of simply giving input into the Delaware and corps process I would respectfully request that you do so in a way that helps inform the public and other government officials of your review, perspectives, findings and input – and that you prepare a full DRBC written comment that is released to the public prior to the close of any state or federal comment deadlines laying out your review and findings and how you expressed them to the Corps and the state of Delaware.

Respectfully requested,

A handwritten signature in blue ink that reads "Maya K. van Rossum".

Maya K. van Rossum
the Delaware Riverkeeper

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
dm@delawareriverkeeper.org
www.delawareriverkeeper.org