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November 25, 2017

New Jersey Department of Environmental Protection
Division of Land Use Regulation
P.O. Box 420, Mail Code 501-02A
501 East State Street
Trenton, NJ 08625

RE: NJDEP Waterfront Development Permit Application by Port Imperial Ferry Corp. d/b/a NY Waterway for Block 259, Lot 1; 901 Sinatra Drive, City of Hoboken, Hudson County

Attn: Hudson County Section Chief

There are three very good reasons not to cluster diesel exhaust emitting ferries in a densely populated, urban environment: air pollution, air pollution and air pollution.

The Union Dry Dock Yard is a short distance from a large condominium complex, and older, residential neighborhoods. It is only yards from a heavily used, five-acre park, and adjacent to a busy skateboard park. Abutting its west perimeter are a busy sidewalk, jogging path, and bicycle lane. It is also just down the hill from a school, Stevens Institute of Technology. The pollution will adversely affect hundreds daily.

The attached article downloaded from Union of Concerned Scientists' website tells the story. DEP needs to do its job of protecting the health of the citizens of Hoboken. For these and other reasons I respectfully request this application be denied.

Sincerely,

attachment

Diesel Engines and Public Health

With mounting evidence that diesel exhaust poses major health hazards, reducing diesel pollution has become a public priority.

Health Impacts of Diesel Pollution

Diesel-powered vehicles and equipment account for nearly half of all nitrogen oxides (NO_x) and more than two-thirds of all particulate matter (PM) emissions from US transportation sources.

Particulate matter or soot is created during the incomplete combustion of diesel fuel. Its composition often includes hundreds of chemical elements, including sulfates, ammonium, nitrates, elemental carbon, condensed organic compounds, and even carcinogenic compounds and heavy metals such as arsenic, selenium, cadmium and zinc.¹ Though just a fraction of the width of a human hair, particulate matter varies in size from coarse particulates (less than 10 microns in diameter) to fine particulates (less than 2.5 microns) to ultrafine particulates (less than 0.1 microns). Ultrafine particulates, which are small enough to penetrate the cells of the lungs, make up 80-95% of diesel soot pollution.

Particulate matter irritates the eyes, nose, throat, and lungs, contributing to respiratory and cardiovascular illnesses and even premature death. Although everyone is susceptible to diesel soot pollution, children, the elderly, and individuals with preexisting respiratory conditions are the most vulnerable. Researchers estimate that, nationwide, tens of thousands of people die prematurely each year as a result of particulate pollution. Diesel engines contribute to the problem by releasing particulates directly into the air and by emitting nitrogen oxides and sulfur oxides, which transform into "secondary" particulates in the atmosphere.

Diesel emissions of nitrogen oxides contribute to the formation of ground level ozone, which irritates the respiratory system, causing coughing, choking, and reduced lung capacity. Ground level ozone pollution, formed when nitrogen oxides and hydrocarbon emissions combine in the presence of sunlight, presents a hazard for both healthy adults and individuals suffering from respiratory problems. Urban ozone pollution has been linked to increased hospital admissions for respiratory problems such as asthma, even at levels below the federal standards for ozone.

Diesel exhaust has been classified a potential human carcinogen by the U.S. Environmental Protection Agency (EPA) and the International Agency for Research on Cancer. Exposure to high levels of diesel exhaust has been shown to cause lung tumors in rats, and studies of humans routinely exposed to diesel fumes indicate a greater risk of lung cancer. For example, occupational health studies of railroad, dock, trucking, and bus garage workers exposed to high levels of diesel exhaust over many years consistently demonstrate a 20 to 50 percent increase in the risk of lung cancer or mortality. ²

¹ Particulate Matter (TSP and PM-10) in Minnesota. Minnesota Pollution Control Agency. December 1997.

² Health Assessment Document for Diesel Engine Exhaust. National Center for Environmental Assessment, Office of Research and Development, US EPA. Washington D.C. May 2002. page 9-11. EPA/600/8-90/057F.