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The League of Women Voters of New Jersey (LWV NJ) encourages active and informed participation in government. Although we are not primarily an environmental organization, we are a public policy organization, we study and weigh issues as it affects New Jersey and neighboring states.

The League of Women Voters of New Jersey opposes the application by for the PVSC for a Title V Air Permit Modification for your proposed Standby Power Generating Facility in the Ironbound neighborhood of Newark. Even though your latest presentation stated this facility will operate only 12 days each year, there is no need for this facility. PSE&G is strengthening their grid to withstand another "superstorm" and PVSC can do the same by constructing a micro-grid on the property. Your plans call for the use of natural gas which will be provided by hydraulic fracturing which uses a toxic mix of chemicals. The residents of Ironbound already have some of the worst health outcomes in the State, if not the nation. They do not need more chemicals.

The League supports the NJ Energy Master Plan (EMP), which requires rapid reduction in the use of fossil fuels. However, this PVSC plan increases the use of fossil fuels, making the objective of the EMP harder to achieve.

We also support the Environmental Justice Law, which limits the addition of new facilities in neighborhoods already overburdened by industrial pollution. The Ironbound is one such neighborhood, with several power plants nearby, Newark Airport immediately to the South, Port Newark to the East, and many converging highways with heavy truck traffic.

This month, over 130 doctors, medical professionals, and others sent a letter to Governor Murphy opposing the plant and citing serious health inequities that include a staggering high rate of childhood asthma. The constant assault on the health and welfare of Newark's residents from trucks, planes, power plants, and more is unacceptable.

Additional PVSC facilities, which are labeled as "Resilience" must not be built near this neighborhood or anywhere else in our state. There must be a guarantee that no fossil fuels be used for this facility, and also that no additional pollution or emissions will occur. Burning gas from hydraulic fracturing only adds to the very real problem of climate change. There are renewable options that have not been fully explored.

We thank the Passaic Valley Sewerage Commission for using some solar power to reduce the environmental impact of the PVSC operation. However, we question whether the use of "green advanced renewable fuels" is truly an advance, since they still require burning hydrocarbons. We are

also pleased to see at the hiring consultants to help evaluate ways to reduce fossil fuel usage in PVSC facilities. We hope to see actual reductions in the near future, and not just evaluations and plans.

In addition, it is vitally important to realize that climate change is an existential threat to New Jersey's shore, which is precious to most New Jerseyans and an important driver of our economy. Climate change is also a threat to our ports and our port cities, again an essential part of the economy, and we must reduce our reliance on fossil fuels.

The health of New Jersey's residents should be paramount in decision-making about development, and it is scientifically proven that emissions from fossil fuel plants create a variety of health challenges. It may appear that this is just one power plant and you consider it a small contribution to the totality of global warming, but what you do will have impacts beyond the plant itself. PSVC can show the rest of the state and the nation how to manage future development while using renewable energy sources for resilience in a way that protects our health, our environment, and our economy instead of threatening it.

We urge you to conduct an environmental impact study to assess the impact of this application on the health and welfare of the children and adults of the nearby communities.

Eleanor Gruber, Co-chair, League of Women Voters of New Jersey Natural Resources Committee