



c/o Delaware River Greenway Partnership  
PO Box 15  
Stockton, NJ 08559  
[www.lowerdelawarewildandscenic.org](http://www.lowerdelawarewildandscenic.org)

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**DATE:** June 15, 2021

**TO:** Melinda Montgomery, A.A.E., Airport Manager, Trenton-Mercer Airport  
Brian M. Hughes, County Executive, Mercer County, NJ  
Staff, McFarland Johnson

**RE:** Trenton-Mercer Airport Expansion & Draft Environment Impact Assessment

**FROM:** Richard Dodds, Chairman, Lower Delaware Wild & Scenic River Management Council  
[rdodds@kingwoodtownship.com](mailto:rdodds@kingwoodtownship.com)

**CC:** \* Sarah Bursky, Community Planner/Rivers Manager, National Park Service,  
[sarah\\_bursky@nps.gov](mailto:sarah_bursky@nps.gov)

\* Maryann Carroll, Executive Director, Delaware River Greenway Partnership,  
[maryann@delawarerivergp.org](mailto:maryann@delawarerivergp.org)

The Lower Delaware Wild and Scenic River Management Council submits these comments in response to the Trenton-Mercer Airport Terminal Area Improvements Draft Environmental Impact Assessment and the potential impacts to the Lower Delaware River system.

### **Wild and Scenic Rivers Background**

The Lower Delaware is the National Wild and Scenic River System segment established by Congress on November 1, 2000 as Public Law 106-418 and includes 38.9 miles of the Delaware River which forms the Pennsylvania and New Jersey border, plus named tributaries. The National Park Service (NPS) is responsible for the long term protection of the River and administering the Wild and Scenic Rivers Act. NPS works closely with the Wild and Scenic Management Council, which was created through the designation as an advisory and coordinating body. The Council is comprised of representatives from local, state and federal governments, as well as local nonprofits. The Lower Delaware River Management Plan (August 1997) was developed as a part of the Wild and Scenic River Study, and approved by all State and local parties, and referenced by Congress as the Plan by which the Wild and Scenic River would be managed; it identifies scenic resources, ecological resources, and water quality as key attributes of the River that must be “protected and enhanced.”

### **Issues of Concern**

While Ewing Township is not in the Wild and Scenic River designated corridor, the proposed airport terminal expansion is approximately one and a half miles east of the River and less than a mile from the

airport boundary. Flight paths and increased development, particularly takeoff and approaches to runways 06 and 24, will have an impact on the river system overall. The Management Council notes the following issues of concern:

- **Stormwater and Wastewater Planning:** The airport expansion was planned with current and future growth in mind. Increased flight patterns, greater fuel loads, and the removal of trees will have a combined impact of additional impervious coverage and greater pollution from stormwater runoff. In addition, increased contamination from jet fuel and firefighting foam into the River, and possible spread of PFOA chemicals from existing contaminated sites further into groundwater resources are possible. The Council has the following questions:
  - Will groundwater and surface water resources be monitored for a period of time? What protections will be in place?
  - Can permeable and green stormwater infrastructure be used to show a net improvement to the region in the face of climate change?
- **Scenic and Noise Impact:** Scenery is an outstanding resource value for which the Lower Delaware Wild and Scenic River was designated. Our River Management Plan names protecting and enhancing scenic resources as an objective to which all parties agreed upon designation (<https://www.lowerdelawarewildandscenic.org/resources/documents/lower-delaware-wild-and-scenic-management-plan>). The views associated with the Lower Delaware are iconic and planning for the visual impact of greatly increased flight patterns over the River, combined with removal of trees for development, requires careful planning and possible mitigation efforts.

While the environmental assessment addressed soundscapes and viewsheds directly around the terminal construction site, it did not provide an analysis of increases in noise or increase in traffic of flight paths over the River and further from the terminal. The Wild and Scenic River would count as a “noise sensitive location.” The Council requests that there be no impact to the visual resources of the River, nor any net increase in sound. The Council has the following questions:

1. Will flight paths increase over the Wild and Scenic River? Or are there options to pursue increasing flight paths over already developed areas or existing flight patterns that are not over the River?
  2. How would soundscapes be impacted two to three miles away?
  3. Will an increase in traffic and flight patterns change any dark skies over the River?
- **Environmental Analysis:** We understand that the expansion of the Trenton-Mercer Airport project has been long in the planning to meet the demands of a heavily travelled corridor and to support the economic growth of Mercer County. With that said, the airport is pursuing a series of separate projects which may have a cumulative effect. NPS and the Lower Delaware Wild and Scenic River Management Council request careful oversight as it pertains to water resources. We believe a comprehensive environmental and public health analysis should be conducted to examine the collective impact of the expansion projects. This includes the terminal expansion itself, the runway protective zone, and the anticipated increase of traffic. We feel a full environmental impact statement, in addition to the assessment, should be completed.

Thank you for your consideration.