



c/o Delaware River Greenway Partnership
PO Box 15, Stockton, NJ 08559
www.lowerdelawarewildandscenic.org

DATE: February 11, 2020

TO: Melinda Montgomery, A.A.E., Airport Manager, Trenton-Mercer Airport
Brian M. Hughes, County Executive, Mercer County, NJ
Kelvin Ganges, Chief of Staff, Mercer County, NJ
Bert H. Steinmann, Mayor, Township of Ewing, NJ
Jim McManion, Business Administrator, Township of Ewing, NJ
Charles Latini, Executive Director, Redevelopment Agency, Township of Ewing, NJ
Maxwell Dolphin, Land Use Regulation, Bureau of Inland Regulation, NJDEP
Patrick Ryan, Land Use Regulation, Bureau of Inland Regulation, NJDEP

RE: Trenton-Mercer Airport Expansion Comments

The Lower Delaware Wild and Scenic River Management Council submits these comments in response to the anticipated Trenton-Mercer Airport Expansion project 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 expansion is approximately three miles east of the River, and flight paths and increased development 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. Increased flight traffic and associated noise could disrupt River corridor wildlife.
- **Scenic 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.
- **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 ask that a comprehensive environmental and public health analysis 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 look forward to further communication on these issues. Please contact me at richard.dodds@accesspointsolutions.com with any questions.

Sincerely,

Richard Dodds, Chair

cc: Sarah Bursky, Community Planner/Rivers Manager, National Park Service,
sarah_bursky@nps.gov

Maryann Carroll, Executive Director, Delaware River Greenway Partnership,
maryann@delawarerivergpp.org